

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information



Review

Selected Account: Verano AL, LLC

Your application has been filed with the Alabama Medical Cannabis Commission.

i If you do not receive email notifications, please check your spam folder.
You must print or save this page as a PDF as part of your redacted filing.

Request for Business Application Information

✓ Request Number: 0230

General Applicant Information

✓ Applicant Name: Verano Alabama, L
LC

✓ Applying as: Business Entity

✓ Trade Name (DBAs) : Zen Leaf

✓ Identification Number Type : FEIN

✓ Federal Tax Identification Number

✓ Business Entity Name : VERANO ALABAMA
LLC

✓ Business Entity Type : Limited Liability Co
mpany

✓ Secretary of State Entity ID Number

✓ Federal Business Code No : 111998

✓ Date of Qualification, Organization or Incorporation: 06/07/202
2

Applicant Street Address

✓ Street: 641 S LAWRENCE S
T

Unit No / Apt No:

✓ City: MONTGOMERY

✓ County: 51-Montgomery

✓ State: Alabama

✓ Zip Code: 36104

✓ Address Verified?: Yes

Applicant Mailing Address

✓ Street: 415 N DEARBORN
ST

✓ Unit No / Apt No: FL 4

✓ City: CHICAGO

✓ State: Illinois

✓ Zip Code: 60654

✓ **Address Verified?:**

✓ **Applicant Website** : <https://al.zenleafdispensaries.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?** :No

Primary Contact Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Address Verified?:** Yes

License Information

✓ **License Type:** Integrated Facility

Facility Information

Facility Information

✓ **Facility Type:** Cultivation Facility

Physical Address

✓ **Street:** **Unit No / Apt No** : ✓ **City:** LUYERNE

✓ **County:** 21-Crenshaw ✓ **State:** Alabama ✓ **Zip Code:** 36049

✓ **Address Verified?:** Yes

Facility Information Questions



- ✓ Is this facility under construction? : No
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will commence operations at this facility : 50
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will reach full capacity at this facility : 365
- ✓ Does the applicant verify that this proposed facility will be in a permissible location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances? : Yes

✓ Facility Type: Processing Facility

Physical Address

- ✓ Street: Unit No / Apt : No ✓ City: LUVERNE
- ✓ County: 21-Crenshaw ✓ State: Alabama ✓ Zip Code: 36049
- ✓ Address Verified? : Yes

Facility Information Questions

- ✓ Is this facility under construction? : No
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will commence operations at this facility : 50
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will reach full capacity at this facility : 180
- ✓ Does the applicant verify that this proposed facility will be in a permissible location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances? : Yes

✓ Facility Type: Dispensing Site (Retail Facility) ✓ Dispensing : Stand Alone Building Site Premises

Physical Address

- ✓ **Street:** **Unit No / Apt** : **City:** MONTGOMERY
No
- ✓ **County:** 51-Montgomery ✓ **State:** Alabama ✓ **Zip Code:** 36110
- ✓ **Address** : Yes
Verified?

Facility Information Questions

- ✓ **Applicant's interest in** :
property where proposed
facility is located
- ✓ **Is this facility under** : No
construction?
- ✓ **The number of days, if awarded a license, within which the Applicant** : 180
reasonably projects it will commence operations at this facility
- ✓ **The number of days, if awarded a license, within which the Applicant** : 180
reasonably projects it will reach full capacity at this facility
- ✓ **Does the applicant verify that this proposed facility will be in a permissible** : Yes
location, if applicable, and will maintain compliance with all State and local
laws, resolutions and ordinances?

-
- ✓ **Facility Type:** Dispensing Site (Retail Facility)
 - ✓ **Dispensing** : Stand Alone Building
Site Premises

Physical Address

- ✓ **Street:** **Unit No / Apt** : **City:** BIRMINGHAM
No
- ✓ **County:** 37-Jefferson ✓ **State:** Alabama ✓ **Zip Code:** 35212
- ✓ **Address** : Yes
Verified?

Facility Information Questions

- ✓ **Is this facility under** : No
construction?
- ✓ **The number of days, if awarded a license, within which the Applicant** : 180
reasonably projects it will commence operations at this facility

- ✓ The number of days, if awarded a license, within which the Applicant : 180 reasonably projects it will reach full capacity at this facility
- ✓ Does the applicant verify that this proposed facility will be in a permissible : Yes location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances?

- ✓ Facility Type: Dispensing Site (Retail Facility)
- ✓ Dispensing Site Premises : Stand Alone Building

Physical Address

- ✓ Street: Unit No / Apt : No
- ✓ City: DOTHAN
- ✓ County: 35-Houston
- ✓ State: Alabama
- ✓ Zip Code: 36301
- ✓ Address Verified? : Yes

Facility Information Questions

- ✓ Is this facility under construction? : No
- ✓ The number of days, if awarded a license, within which the Applicant : 180 reasonably projects it will commence operations at this facility
- ✓ The number of days, if awarded a license, within which the Applicant : 180 reasonably projects it will reach full capacity at this facility
- ✓ Does the applicant verify that this proposed facility will be in a permissible : Yes location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances?

- ✓ Facility Type: Dispensing Site (Retail Facility)
- ✓ Dispensing Site Premises : Stand Alone Building

Physical Address

- ✓ Street: Unit No / Apt : No
- ✓ City: TUSCALOOSA
- ✓ County: 63-Tuscaloosa
- ✓ State: Alabama
- ✓ Zip Code: 35404
- ✓ Address Verified? : Yes

Facility Information Questions

- ✓ Is this facility under construction? : No
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will commence operations at this facility : 180
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will reach full capacity at this facility : 180
- ✓ Does the applicant verify that this proposed facility will be in a permissible location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances? : Yes

-
- ✓ Facility Type: Dispensing Site (Retail Facility)
 - ✓ Dispensing Site Premises : Stand Alone Building

Physical Address

- ✓ Street: Unit No / Apt No : City: DECATUR
- ✓ County: 52-Morgan ✓ State: Alabama ✓ Zip Code: 35603
- ✓ Address Verified? : Yes

Facility Information Questions

- ✓ Is this facility under construction? : No
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will commence operations at this facility : 180
- ✓ The number of days, if awarded a license, within which the Applicant reasonably projects it will reach full capacity at this facility : 180
- ✓ Does the applicant verify that this proposed facility will be in a permissible location, if applicable, and will maintain compliance with all State and local laws, resolutions and ordinances? : Yes

Ownership of Applicant

- ✓ Select type of record: Entity
- ✓ Does this entity have ownership interest in the applicant? : Yes

Entity

✓ **Entity Name:** LANIER LONG PROPERTIES, LLC

✓ **Entity Type:** Limited Liability Company

✓ **Are there individuals with direct or indirect ownership interest in this entity?** : Yes

✓ **FEIN:**

✓ **Ownership Percentage of the Applicant** : 51

Physical Address

✓ **Street:**

Unit No / Apt No :

✓ **City:**

✓ **State:** Alabama

✓ **Zip Code:**

✓ **Address Verified?** : Yes

Primary Contact/ Responsible Person

✓ **First Name:** Mary Margaret

✓ **Last Name:** Lanier Long

✓ **Title:** Member

✓

✓ **Address Verified?** : Yes

✓ **Select type of record:** Entity

✓ **Does this entity have ownership interest in the applicant?** : Yes

Entity

✓ **Entity Name:** Verano Holdings Corporation

✓ **Entity Type:** Publicly Held Corporation

✓ **Are there individuals with direct or indirect ownership interest in this entity?** : Yes

✓ **Ownership Percentage of the Applicant** : 49

Physical Address

✓ **Street:** 415 N DEARBORN ST

Unit No / Apt No :

✓ **City:** CHICAGO

✓ **State:** Illinois

✓ **Zip Code:** 60654

✓ Address : Yes
Verified?

Primary Contact/ Responsible Person

✓ First Name: Darren

✓ Last Name: Weis

✓ Title: Chief Operating Office
r

✓

✓ Address : Yes
Verified?

Cannabis Industry Entities

✓ Is any individual or entity below connected to any entity that is directly or indirectly involved in the cannabis industry, including, :Yes
but not limited to, the cultivation, processing, packaging, labeling, testing, transporting, or sale of cannabis or medical
cannabis, either in Alabama or any other jurisdiction?
(1) an individual with an ownership interest in the applicant;
(2) the spouse, parent, or child of an individual with an ownership interest in the applicant; or
(3) an entity with an ownership interest in the applicant.

✓ Select : Entity
Individual or
Entity:

Entity

✓ Ownership : Verano Holdings Cor
Entity Name p.

✓ Cannabis : Fort Consulting, LLC
Entity Name

✓ Connection to : Cannabis entity is a s
Cannabis subsidiary, affiliate, co
Entity conglomerate, parent, or
other entity that share
s common ownershi
p, directly or indirectl
y, with the ownership
entity.

✓

Cannabis Entity's Physical Address

✓ Street: 12620 N CAVE CREEK
RD

✓ Unit No / Apt : STE 1
No

✓ City: PHOENIX

✓ State: Arizona

✓ Zip Code: 85022

✓ Address : Yes
Verified?

Cannabis Entity's Primary Contact/Responsible Person

✓ First Name: James

✓ Last Name: Leventis

✓ Title: Executive Vice Presid
ent

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Perpetual Healthcare, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 4244 W DUNLAP AVE
STE 1

✓ **Unit No / Apt No** :

✓ **City:** PHOENIX

✓ **State:** Arizona

✓ **Zip Code:** 85051

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corporation.

✓ **Cannabis Entity Name** : Patient Alternative Relief Center, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 4201 E UNIVERSITY DR

✓ **Unit No / Apt No** :

✓ **City:** PHOENIX

✓ **State:** Arizona

✓ **Zip Code:** 85034

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corporation.

✓ **Cannabis Entity Name** : AZGM3, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓ **FEIN:**

Cannabis Entity's Physical Address

✓ **Street:** 7200 W CHANDLER BLVD STE 7

✓ **Unit No / Apt No** :

✓ **City:** CHANDLER

✓ **State:** Arizona

✓ **Zip Code:** 85226

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** The Medicine Room, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

Cannabis Entity's Physical Address

✓ **Street:** 550 W MCKELLIPS ROAD BLDG 1

Unit No / Apt No :

✓ **City:** MESA

✓ **State:** Arizona

✓ **Zip Code:** 85201

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Vending Logistics, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 5409 S POWER RD

Unit No / Apt No:

✓ **City:** MESA

✓ **State:** Arizona

✓ **Zip Code:** 85212

✓ **Address Verified?:** Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?:** Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** NatureX, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 9120 W POST RD STE
103

✓ **Unit No / Apt :**
No

✓ **City:** LAS VEGAS

✓ **State:** Nevada

✓ **Zip Code:** 89148

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** James

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Lone Mountain Partners, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 2900 E LONE MOUNTAIN RD

✓ **Unit No / Apt :**
No

✓ **City:** N LAS VEGAS

✓ **State:** Nevada

✓ **Zip Code:** 89081

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : WSCC, Inc.

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 3493 ARROWHEAD DR

✓ **Unit No / Apt No** :

✓ **City:** CARSON CITY

✓ **State:** Nevada

✓ **Zip Code:** 89706

✓ **Address Verified?** :

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Ataraxia, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 884 INDUSTRIAL ST

Unit No / Apt No :

✓ **City:** ALBION

✓ **State:** Illinois

✓ **Zip Code:** 62806

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Healthway Services of West Illinois, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 3691 E MAIN ST

Unit No / Apt No :

✓ **City:** ST CHARLES

✓ **State:** Illinois

✓ **Zip Code:** 60174

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Elevele, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 2030 SKOKIE VALLEY RD

✓ **Unit No / Apt :** No

✓ **City:** HIGHLAND PARK

✓ **State:** Illinois

✓ **Zip Code:** 60035

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : MME Evanston Retail, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 1804 MAPLE AVE

Unit No / Apt :
No

✓ **City:** EVANSTON

✓ **State:** Illinois

✓ **Zip Code:** 60201

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : MME Aurora Retail, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 740 N ROUTE 59

Unit No / Apt :
No

✓ **City:** AURORA

✓ **State:** Illinois

✓ **Zip Code:** 60504

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** The Herbal Care Center, Inc.

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 1301 S WESTERN AVE

Unit No / Apt No :

✓ **City:** CHICAGO

✓ **State:** Illinois

✓ **Zip Code:** 60608

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** 420 Capital Management, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 783 E BUTTERFIELD RD

Unit No / Apt No:

✓ **City:** LOMBARD

✓ **State:** Illinois

✓ **Zip Code:** 60148

✓ **Address Verified?:** Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?:** Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Mother Grows Best, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 1851 STEINWAY BLV
D SE

✓ **Unit No / Apt :**
No

✓ **City:** CANTON

✓ **State:** Ohio

✓ **Zip Code:** 44707

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name :** Verano Holdings Corp.

✓ **Cannabis Entity Name :** Mother Knows Best, LLC

✓ **Connection to Cannabis Entity :** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 3224 CLEVELAND AV
E NW

✓ **Unit No / Apt :**
No

✓ **City:** CANTON

✓ **State:** Ohio

✓ **Zip Code:** 44709

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Ohio Natural Treatment Solutions, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 1250 N 21ST ST

✓ **Unit No / Apt No** :

✓ **City:** NEWARK

✓ **State:** Ohio

✓ **Zip Code:** 43055

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : GreenRx, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ Street: 8410 VINE ST

Unit No / Apt :
No

✓ City: CINCINNATI

✓ State: Ohio

✓ Zip Code: 45216

✓ Address Verified? : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ First Name: James

✓ Last Name: Leventis

✓ Title: Executive Vice President



✓ Address Verified? : Yes

✓ Select Individual or Entity: Entity

Entity

✓ Ownership Entity Name : Verano Holdings Corp.

✓ Cannabis Entity Name : Glass City Alternative s, LLC

✓ Connection to Cannabis Entity : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ Street: 1155 N MAIN ST

Unit No / Apt :
No

✓ City: BOWLING GREEN

✓ State: Ohio

✓ Zip Code: 43402

✓ Address Verified? : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ First Name: James

✓ Last Name: Leventis

✓ Title: Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Mad River Remedies, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 5604 AIRWAY RD

✓ **Unit No / Apt :** No

✓ **City:** RIVERSIDE

✓ **State:** Ohio

✓ **Zip Code:** 45431

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Verano WV, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 205 VENTURE DR

Unit No / Apt :
No

✓ **City:** MORGANTOWN

✓ **State:** West Virginia

✓ **Zip Code:** 26508

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Agri-Kind, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 102 BROOMALL ST

Unit No / Apt :
No

✓ **City:** CHESTER

✓ **State:** Pennsylvania

✓ **Zip Code:** 19013

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Agronomed Biologics, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 8th & Hinkson Street

Unit No / Apt No :

✓ **City:** Chester

✓ **State:** Pennsylvania

✓ **Zip Code:** 19013

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Local Dispensaries, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 137 S 17TH ST

Unit No / Apt No:

✓ **City:** HARRISBURG

✓ **State:** Pennsylvania

✓ **Zip Code:** 17104

✓ **Address Verified?:** Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?:** Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** NSE Pennsylvania, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 2504 WELSH RD

Unit No / Apt :
No

✓ **City:** PHILADELPHIA

✓ **State:** Pennsylvania

✓ **Zip Code:** 19152

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** TerraVida Holistic Centers, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 64 N MAIN ST

Unit No / Apt :
No

✓ **City:** SELLERSVILLE

✓ **State:** Pennsylvania

✓ **Zip Code:** 18960

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** : Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corporation.

✓ **Cannabis Entity Name** : The Healing Center, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 270 EXECUTIVE DR

Unit No / Apt No :

✓ **City:** CRANBERRY TWP

✓ **State:** Pennsylvania

✓ **Zip Code:** 16066

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** : Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corporation.

✓ **Cannabis Entity Name** : Freestate Wellness, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 7221 MONTEVIDEO R
D

✓ **Unit No / Apt :**
No

✓ **City:** JESSUP

✓ **State:** Maryland

✓ **Zip Code:** 20794

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name :** Verano Holdings Corp.

✓ **Cannabis Entity Name :** FGM Processing, LLC

✓ **Connection to Cannabis Entity :** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 4781 CRAIN HWY ST
E B

✓ **Unit No / Apt :**
No

✓ **City:** WHITE PLAINS

✓ **State:** Maryland

✓ **Zip Code:** 20695

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corporation

✓ **Cannabis Entity Name** : AGG Wellness, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓ **FEIN:** 474925083

Cannabis Entity's Physical Address

✓ **Street:** 101 E CHESAPEAKE AVE

Unit No / Apt : No

✓ **City:** TOWSON

✓ **State:** Maryland

✓ **Zip Code:** 21286

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Mikran, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

Cannabis Entity's Physical Address

✓ **Street:** 13007 WISTERIA DR

Unit No / Apt :
No

✓ **City:** GERMANTOWN

✓ **State:** Maryland

✓ **Zip Code:** 20874

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Maryland Natural Treatment Solutions, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 16 MAGOTHY BEACH RD

Unit No / Apt :
No

✓ **City:** PASADENA

✓ **State:** Maryland

✓ **Zip Code:** 21122

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name:** Verano Holdings Corp.

✓ **Cannabis Entity Name:** Verano NJ, LLC

✓ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 3576 US-22

Unit No / Apt No :

✓ **City:** Branchburg

✓ **State:** New Jersey

✓ **Zip Code:** 08876

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✔ **Select Individual or Entity:** Entity

Entity

✔ **Ownership Entity Name:** Verano Holdings Corp.

✔ **Cannabis Entity Name:** Connecticut Pharmaceutical Solutions, LLC

✔ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✔

Cannabis Entity's Physical Address

✔ **Street:** 47 MAIN ST

Unit No / Apt No:

✔ **City:** PORTLAND

✔ **State:** Connecticut

✔ **Zip Code:** 06480

✔ **Address Verified?:** Yes

Cannabis Entity's Primary Contact/Responsible Person

✔ **First Name:** James

✔ **Last Name:** Leventis

✔ **Title:** Executive Vice President

✔

✔ **Address Verified?:** Yes

✔ **Select Individual or Entity:** Entity

Entity

✔ **Ownership Entity Name:** Verano Holdings Corp.

✔ **Cannabis Entity Name:** Willow Brook Wellness, LLC

✔ **Connection to Cannabis Entity:** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✔

Cannabis Entity's Physical Address

✓ **Street:** 1371 E MAIN ST

✓ **Unit No / Apt :**
No

✓ **City:** MERIDEN

✓ **State:** Connecticut

✓ **Zip Code:** 06450

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name :** Verano Holdings Corp.

✓ **Cannabis Entity Name :** Caring Nature, LLC

✓ **Connection to Cannabis Entity :** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 237 E AURORA ST ST E 6

✓ **Unit No / Apt :**
No

✓ **City:** WATERBURY

✓ **State:** Connecticut

✓ **Zip Code:** 06708

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Four Daughters Compassionate Care, Inc.

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 1200 GENERAL EDWARDS HWY

✓ **Unit No / Apt No** :

✓ **City:** SHARON

✓ **State:** Massachusetts

✓ **Zip Code:** 02067

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Plants of Ruskin, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 5909 N US HIGHWAY
41

✓ **Unit No / Apt :**
No

✓ **City:** APOLLO BEACH

✓ **State:** Florida

✓ **Zip Code:** 33572

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** Entity

Entity

✓ **Ownership Entity Name :** Verano Holdings Corp.

✓ **Cannabis Entity Name :** Noahs Ark, LLC

✓ **Connection to Cannabis Entity :** Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

Cannabis Entity's Physical Address

✓ **Street:** 3213 N WEST AVE

✓ **Unit No / Apt :**
No

✓ **City:** EL DORADO

✓ **State:** Arkansas

✓ **Zip Code:** 71730

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** : Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings Corp.

✓ **Cannabis Entity Name** : Buchanan Development, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.



Cannabis Entity's Physical Address

✓ **Street:** 259 E FRONT ST

Unit No / Apt :
No

✓ **City:** BUCHANAN

✓ **State:** Michigan

✓ **Zip Code:** 49107

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President



✓ **Address Verified?** : Yes

✓ **Select Individual or Entity:** : Entity

Entity

✓ **Ownership Entity Name** : Verano Holdings, Corp.

✓ **Cannabis Entity Name** : VMO Retail, LLC

✓ **Connection to Cannabis Entity** : Cannabis entity is a subsidiary, affiliate, conglomerate, parent, or other entity that shares common ownership, directly or indirectly, with the ownership entity.

✓

Cannabis Entity's Physical Address

✓ **Street:** 10420 BLUE RIDGE BLVD

✓ **Unit No / Apt No** :

✓ **City:** KANSAS CITY

✓ **State:** Missouri

✓ **Zip Code:** 64134

✓ **Address Verified?** : Yes

Cannabis Entity's Primary Contact/Responsible Person

✓ **First Name:** James

✓ **Last Name:** Leventis

✓ **Title:** Executive Vice President

✓

✓ **Address Verified?** : Yes

Questions and Attestations

✓ **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?** NO

✓ **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

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Fort Consulting, LLC

✓ **License Type:** Medical Marijuana Dispensary

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued Date**: 10/06/2021

✓ **License Expiration Date** : 10/06/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Perpetual Healthcare, LLC ✔ **License Type:** Marijuana Establishment License

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 08/07/2022 ✔ **License Expiration Date:** 08/07/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Patient Alternative Relief Center, LLC ✔ **License Type:** Marijuana Establishment License

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 08/07/2022 ✔ **License Expiration Date:** 08/07/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** AZGM3, LLC ✔ **License Type:** Medical Marijuana Dispensary

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 09/10/2021 ✔ **License Expiration Date:** 10/06/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** The Medicine Room, LLC ✔ **License Type:** Medical Marijuana Dispensary

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 08/07/2022 ✔ **License Expiration Date:** 08/07/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Vending Logistics, LLC ✔ **License Type:** Medical Marijuana Dispensary

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 10/06/2021 ✔ **License Expiration Date:** 10/06/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** NatureX, LLC ✔ **License Type:** Adult Use Retail Store License

✔ **Licensing Board or Commission:** Nevada Cannabis Compliance Board ✔ **License Issued Date:** 06/29/2022 ✔ **License Expiration Date:** 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Lone Mountain Partners, LLC ✔ **License Type:** Medical Cultivation License

✔ **Licensing Board or Commission:** Nevada Cannabis Compliance Board ✔ **License Issued Date:** 05/25/2022 ✔ **License Expiration Date:** 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** WSCC, Inc. ✔ **License Type:** Medical Cultivation License (2 Licenses)

✔ **Licensing Board or Commission:** Nevada Cannabis Compliance Board ✔ **License Issued Date:** 05/17/2022 ✔ **License Expiration Date:** 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Ataraxia, LLC ✔ **License Type:** Medical Cannabis Cultivation Permit

✓ **Licensing Board or Commission** : Illinois DOA Division of Cannabis Regulation

✓ **License Issued: Date** : 03/09/2022

✓ **License Expiration Date** : 03/09/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** Adult Use Cannabis Dispensing Organization

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 03/31/2022

✓ **License Expiration Date** : 03/31/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** Medical Cannabis Dispensing Organization

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 12/23/2015

✓ **License Expiration Date** : 12/23/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Elevele, LLC

✓ **License Type:** Adult Use Cannabis Dispensing Organization (2 Licenses)

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 05/10/2022

✓ **License Expiration Date** : 03/31/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** MME Evanston Retail, LLC

✓ **License Type:** MEDICAL CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 11/09/2015

✓ **License Expiration Date** : 11/09/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** MME Evanston Retail, LLC

✓ **License Type:** ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 03/29/2022

✓ **License Expiration Date** : 03/31/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** MME Aurora Retail, LLC

✓ **License Type:** ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 03/29/2022

✓ **License Expiration Date** : 03/31/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** The Herbal Care Center, Inc.

✓ **License Type:** ADULT USE CANNABIS DISPENSING ORGANIZATION (2 Licenses)

✓ **Licensing Board or Commission** : Illinois DFPR Division of Cannabis Regulation

✓ **License Issued: Date** : 04/18/2022

✓ **License Expiration Date** : 03/31/2024

✔ **Select One:** Related Cannabis Entity
✔ **Name:** 420 Capital Management, LLC
✔ **License Type:** ADULT USE CANNABIS DISPENSING ORGANIZATION

✔ **Licensing Board or Commission:** Illinois DFPR Division of Cannabis Regulation
✔ **License Issued Date:** 02/23/2022
✔ **License Expiration Date:** 03/31/2024

✔ **Select One:** Ownership Entity
✔ **Name:** 420 Capital Management, LLC
✔ **License Type:** ADULT USE CANNABIS DISPENSING ORGANIZATION

✔ **Licensing Board or Commission:** Illinois DFPR Division of Cannabis Regulation
✔ **License Issued Date:** 02/28/2022
✔ **License Expiration Date:** 03/31/2024

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Mother Grows Best, LLC
✔ **License Type:** Cultivator License Level 2

✔ **Licensing Board or Commission:** Ohio Medical Marijuana Control Program
✔ **License Issued Date:** 11/25/2019
✔ **License Expiration Date:** 11/24/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Mother Grows Best, LLC
✔ **License Type:** Processor License

✔ **Licensing Board or Commission:** Ohio Medical Marijuana Control Program
✔ **License Issued Date:** 11/25/2019
✔ **License Expiration Date:** 11/24/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Mother Knows Best, LLC
✔ **License Type:** Medical Marijuana Dispensary License

✔ **Licensing Board or Commission:** Ohio Board of Pharmacy
✔ **License Issued Date:** 07/01/2022
✔ **License Expiration Date:** 07/01/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Ohio Natural Treatment Solutions, LLC
✔ **License Type:** Medical Marijuana Dispensary License

✔ **Licensing Board or Commission:** Ohio Board of Pharmacy
✔ **License Issued Date:** 07/01/2022
✔ **License Expiration Date:** 07/01/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** GreenRx, LLC
✔ **License Type:** Medical Marijuana Dispensary License

✔ **Licensing Board or Commission:** Ohio Board of Pharmacy
✔ **License Issued Date:** 07/01/2022
✔ **License Expiration Date:** 07/01/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Glass City Alternatives, LLC
✔ **License Type:** Medical Marijuana Dispensary License

✔ **Licensing Board or Commission:** Ohio Board of Pharmacy
✔ **License Issued Date:** 07/01/2022
✔ **License Expiration Date:** 07/01/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Mad River Remedies, LLC
✔ **License Type:** Medical Marijuana Dispensary License

✔ **Licensing Board or Commission:** Ohio Board of Pharmacy
✔ **License Issued Date:** 07/01/2022
✔ **License Expiration Date:** 07/01/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Verano WV, LLC
✔ **License Type:** Medical Cannabis Dispensary Permit (7 Permits)

✔ **Licensing Board or Commission:** West Virginia Office of Medical Cannabis
✔ **License Issued Date:** 01/29/2022
✔ **License Expiration Date:** 01/28/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Verano WV, LLC
✔ **License Type:** Medical Cannabis Processor Permit

✔ **Licensing Board or Commission:** West Virginia Office of Medical Cannabis
✔ **License Issued Date:** 11/13/2022
✔ **License Expiration Date:** 11/12/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Verano WV, LLC
✔ **License Type:** Medical Cannabis Grower Permit

✔ **Licensing Board or Commission:** West Virginia Office of Medical Cannabis
✔ **License Issued Date:** 10/01/2022
✔ **License Expiration Date:** 09/30/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Agri-Kind, LLC
✔ **License Type:** Grower - Processor License

✔ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✔ **License Issued Date:** 07/31/2022
✔ **License Expiration Date:** 07/31/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Agronomed Biologics, LLC
✔ **License Type:** Grower - Processor License

✔ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✔ **License Issued Date:** 06/19/2022
✔ **License Expiration Date:** 06/19/2023

✔ **Select One:** Related Cannabis Entity
✔ **Name:** Local Dispensaries, LLC
✔ **License Type:** Medical Marijuana Dispensary Permit (3 Permits)

✔ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✔ **License Issued Date:** 12/16/2022
✔ **License Expiration Date:** 12/18/2022

✔ **Select One:** Related Cannabis Entity
✔ **Name:** NSE Pennsylvania, LLC
✔ **License Type:** Medical Marijuana Dispensary Permit (3 Permits)

✔ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✔ **License Issued Date:** 12/16/2022
✔ **License Expiration Date:** 12/18/2023

✓ **Select One:** Related Cannabis Entity
✓ **Name:** TerraVida Holistic Centers, LLC
✓ **License Type:** Medical Marijuana Dispensary Permit (3 Permits)
✓ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✓ **License Issued:** 06/29/2022
✓ **License Expiration Date:** 06/29/2023

✓ **Select One:** Related Cannabis Entity
✓ **Name:** The Healing Center, LLC
✓ **License Type:** Medical Marijuana Dispensary Permit (3 Permits)
✓ **Licensing Board or Commission:** Pennsylvania Office of Medical Marijuana
✓ **License Issued:** 06/29/2022
✓ **License Expiration Date:** 06/29/2023

✓ **Select One:** Related Cannabis Entity
✓ **Name:** Freestate Wellness, LLC
✓ **License Type:** Medical Cannabis Establishment
✓ **Licensing Board or Commission:** Maryland Medical Cannabis Commission
✓ **License Issued:** 08/14/2017
✓ **License Expiration Date:** 08/14/2023

✓ **Select One:** Related Cannabis Entity
✓ **Name:** FGM Processing, LLC
✓ **License Type:** Medical Cannabis Establishment
✓ **Licensing Board or Commission:** Maryland Medical Cannabis Commission
✓ **License Issued:** 05/24/2018
✓ **License Expiration Date:** 05/24/2023

✓ **Select One:** Related Cannabis Entity
✓ **Name:** AGG Wellness, LLC
✓ **License Type:** Medical Cannabis Establishment
✓ **Licensing Board or Commission:** Maryland Medical Cannabis Commission
✓ **License Issued:** 05/24/2018
✓ **License Expiration Date:** 05/24/2024

✓ **Select One:** Related Cannabis Entity
✓ **Name:** Mikran, LLC
✓ **License Type:** Medical Cannabis Establishment
✓ **Licensing Board or Commission:** Maryland Medical Cannabis Commission
✓ **License Issued:** 06/27/2019
✓ **License Expiration Date:** 06/27/2025

✓ **Select One:** Related Cannabis Entity
✓ **Name:** Maryland Natural Treatment Solutions, LLC
✓ **License Type:** Medical Cannabis Establishment
✓ **Licensing Board or Commission:** Maryland Medical Cannabis Commission
✓ **License Issued:** 02/20/2020
✓ **License Expiration Date:** 02/20/2026

✓ **Select One:** Related Cannabis Entity
✓ **Name:** Four Daughters Compassionate Care, Inc.
✓ **License Type:** Medical Marijuana Treatment Center
✓ **Licensing Board or Commission:** Massachusetts Cannabis Control Commission
✓ **License Issued:** 04/04/2018
✓ **License Expiration Date:** 09/17/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Buchanan Development, LLC ✔ **License Type:** Provisioning Center Facility License

✔ **Licensing Board or Commission:** Michigan Marijuana Regulatory Agency ✔ **License Issued Date:** 04/25/2019 ✔ **License Expiration Date:** 04/25/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** VMO Retail, LLC ✔ **License Type:** Medical Marijuana Certificate

✔ **Licensing Board or Commission:** Missouri Division of Regulation and Licensure ✔ **License Issued Date:** 01/23/2022 ✔ **License Expiration Date:** 01/23/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Verano NJ, LLC ✔ **License Type:** Alternate Treatment Center Permit (4 Permits)

✔ **Licensing Board or Commission:** New Jersey Cannabis Regulatory Commission ✔ **License Issued Date:** 12/19/2022 ✔ **License Expiration Date:** 12/31/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Connecticut Pharmaceutical Solutions, LLC ✔ **License Type:** Medical Marijuana Producer

✔ **Licensing Board or Commission:** Connecticut Department of Consumer Protection ✔ **License Issued Date:** 02/11/2022 ✔ **License Expiration Date:** 02/10/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Willow Brook Wellness, LLC ✔ **License Type:** Medical Cannabis Dispensary

✔ **Licensing Board or Commission:** Connecticut Department of Consumer Protection ✔ **License Issued Date:** 12/18/2022 ✔ **License Expiration Date:** 12/17/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Caring Nature, LLC ✔ **License Type:** Medical Cannabis Dispensary

✔ **Licensing Board or Commission:** Connecticut Department of Consumer Protection ✔ **License Issued Date:** 01/27/2022 ✔ **License Expiration Date:** 01/26/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Plants of Ruskin, LLC ✔ **License Type:** Medical Marijuana License

✔ **Licensing Board or Commission:** Florida Department of Health ✔ **License Issued Date:** 10/03/2022 ✔ **License Expiration Date:** 06/22/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Fort Consulting, LLC ✔ **License Type:** Marijuana Establishment License

✔ **Licensing Board or Commission:** Arizona Department of Health Services ✔ **License Issued Date:** 02/16/2021 ✔ **License Expiration Date:** 01/21/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Perpetual Healthcare, LLC ✔ **License Type:** Medical Marijuana Dispensary

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued: 08/07/2022 Date**

✓ **License Expiration Date** : 08/07/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Patient Alternative Relief Center

✓ **License Type:** Medical Marijuana Dispensary

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued: 08/07/2022 Date**

✓ **License Expiration Date** : 08/07/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Azgm 3, LLC

✓ **License Type:** Marijuana Establishment License

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued: 01/22/2021 Date**

✓ **License Expiration Date** : 01/21/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** The Medicine Room, LLC

✓ **License Type:** Marijuana Establishment License

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued: 08/07/2022 Date**

✓ **License Expiration Date** : 08/07/2024

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Vending Logistics, LLC

✓ **License Type:** Marijuana Establishment License

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **License Issued: 01/22/2021 Date**

✓ **License Expiration Date** : 01/21/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Noahs Ark, LLC

✓ **License Type:** Medical Marijuana Permit

✓ **Licensing Board or Commission** : Arkansas Alcoholic Beverage Control Division

✓ **License Issued: 07/01/2022 Date**

✓ **License Expiration Date** : 06/30/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Ataraxia, LLC

✓ **License Type:** Adult Use Cultivation Center License

✓ **Licensing Board or Commission** : Illinois DOA, Division of Cannabis Regulation

✓ **License Issued: 03/31/2022 Date**

✓ **License Expiration Date** : 03/31/2023

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Ataraxia, LLC

✓ **License Type:** Registered Industrial Hemp Processor

✓ **Licensing Board or Commission** : Illinois DOA, Bureau of Medicinal Plants Regulation

✓ **License Issued: 01/01/2020 Date**

✓ **License Expiration Date** : 12/31/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Ataraxia, LLC

✓ **License Type:** Transporter License

✓ **Licensing Board or Commission** : Illinois DOA, Division of Cannabis Regulation

✓ **License Issued: 07/15/2022 Date**

✓ **License Expiration Date** : 07/14/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** GreenGate Chicago ✔ **License Type:** Medical Cannabis Dispensing Organization

✔ **Licensing Board or Commission:** Illinois Division of Professional Regulation ✔ **License Issued Date:** 03/23/2018 ✔ **License Expiration Date:** 04/03/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Healthway Services of West IL, LLC ✔ **License Type:** Adult Use Cannabis Dispensing Organization

✔ **Licensing Board or Commission:** Illinois Division of Professional Regulation ✔ **License Issued Date:** 05/19/2022 ✔ **License Expiration Date:** 03/31/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Elevele, LLC ✔ **License Type:** Medical Cannabis Dispensing Organization

✔ **Licensing Board or Commission:** Illinois Division of Professional Regulation ✔ **License Issued Date:** 03/18/2016 ✔ **License Expiration Date:** 03/18/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** The Herbal Care Center, Inc. ✔ **License Type:** Medical Cannabis Dispensing Organization

✔ **Licensing Board or Commission:** Illinois Division of Professional Regulation ✔ **License Issued Date:** 01/31/2017 ✔ **License Expiration Date:** 01/13/2024

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Freestate Wellness, LLC ✔ **License Type:** Medical Cannabis Establishment

✔ **Licensing Board or Commission:** Maryland Medical Cannabis Commission ✔ **License Issued Date:** 12/14/2017 ✔ **License Expiration Date:** 12/14/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Four Daughters Compassionate Care, Inc. ✔ **License Type:** Marijuana Cultivator

✔ **Licensing Board or Commission:** Massachusetts Cannabis Control Commission ✔ **License Issued Date:** 12/08/2022 ✔ **License Expiration Date:** 12/09/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Four Daughters Compassionate Care, Inc. ✔ **License Type:** Marijuana Product Manufacturer

✔ **Licensing Board or Commission:** Massachusetts Cannabis Control Commission ✔ **License Issued Date:** 12/08/2022 ✔ **License Expiration Date:** 12/09/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Four Daughters Compassionate Care, Inc. ✔ **License Type:** Marijuana Retailer

✔ **Licensing Board or Commission:** Massachusetts Cannabis Control Commission ✔ **License Issued Date:** 12/08/2022 ✔ **License Expiration Date:** 12/09/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Four Daughters Compassionate Care, Inc. ✔ **License Type:** Marijuana Retailer

✔ **Licensing Board or Commission** : Massachusetts Cannabis Control Commission

✔ **License Issued Date**: 11/18/2021

✔ **License Expiration Date** : 01/16/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Buchanan Development, LLC

✔ **License Type:** Establishment License Marihuana Retailer

✔ **Licensing Board or Commission** : Michigan Marijuana Regulatory Agency

✔ **License Issued Date**: 03/16/2022

✔ **License Expiration Date** : 03/16/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Adult-Use Cultivation License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 06/08/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Medical Production License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 05/25/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Adult-Use Production License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 06/08/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Adult-Use Distribution License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 06/19/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** WSCC, Inc.

✔ **License Type:** Adult-Use Cultivation License (2 Licenses)

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 05/17/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** WSCC, Inc.

✔ **License Type:** Medical Production License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 05/17/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity

✔ **Name:** WSCC, Inc.

✔ **License Type:** Adult-Use Production License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board

✔ **License Issued Date**: 05/17/2022

✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** WSCC, Inc. ✔ **License Type:** Adult-Use Distribution License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board ✔ **License Issued Date**: 05/17/2022 ✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Naturex, LLC ✔ **License Type:** Medical Dispensary License

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board ✔ **License Issued Date**: 05/24/2022 ✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Lone Mountain Partners, LLC ✔ **License Type:** Adult-Use Retail Store License (2 Licenses)

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board ✔ **License Issued Date**: 11/29/2022 ✔ **License Expiration Date** : 11/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** WSCC, Inc. ✔ **License Type:** Medical Dispensary License (2 Licenses)

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board ✔ **License Issued Date**: 09/26/2022 ✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** WSCC, Inc. ✔ **License Type:** Adult-Use Retail Store License (2 Licenses)

✔ **Licensing Board or Commission** : Nevada Cannabis Compliance Board ✔ **License Issued Date**: 09/26/2022 ✔ **License Expiration Date** : 06/30/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Agronomed Biologics, LLC ✔ **License Type:** Medical Marijuana Dispensary Facility (3 Licenses)

✔ **Licensing Board or Commission** : Pennsylvania Office of Medical Marijuana ✔ **License Issued Date**: 06/19/2022 ✔ **License Expiration Date** : 06/19/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Verano NJ, LLC ✔ **License Type:** Class 1 - Cultivator

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission ✔ **License Issued Date**: 04/17/2022 ✔ **License Expiration Date** : 04/17/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Verano NJ, LLC ✔ **License Type:** Class 2 - Manufacturer

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission ✔ **License Issued Date**: 04/17/2022 ✔ **License Expiration Date** : 04/17/2023

✔ **Select One:** Related Cannabis Entity ✔ **Name:** Verano NJ, LLC ✔ **License Type:** Class 5 - Retailer (3 Licenses)

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **License Issued: 04/20/2022**
Date

✔ **License Expiration Date** : 04/20/2023

✔ **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?** : YES

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Perpetual Healthcare, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : Arizona Department of Health Services

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Suggestion to add perimeter cameras

✔ **Steps taken in compliance** : Added seven perimeter cameras

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 08/16/2022

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Fort Consulting, LLC

✔ **License Type:** Marijuana Establishment - Vertical

✔ **Licensing Board or Commission** : Arizona Department of Health Services

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor environmental findings and an incomplete manifest

✔ **Steps taken in compliance** : Environmental findings addressed and staff retrained on standard operating procedure for manifest documentation.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 04/14/2022

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Fort Consulting, LLC

✔ **License Type:** Marijuana Establishment - Vertical

✔ **Licensing Board or Commission** : Arizona Department of Health Services

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Scrivener error on chain of custody for lab tests.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures for chain of custody documentation.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 06/30/2022

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Patient Alternative Relief Center, LLC

✔ **License Type:** Marijuana Establishment - Vertical

✔ **Licensing Board or Commission** : Arizona Department of Health Services

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor sanitation issue.

✔ **Steps taken in compliance** : Tools cleaned and staff retrained on standard operating procedures for sanitation.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 09/10/2021

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Patient Alternative Relief Center, LLC

✔ **License Type:** Marijuana Establishment - Vertical

✓ **Licensing Board or Commission** : Arizona Department of Health Services

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor sanitation issue.

✓ **Steps taken in compliance** : Tools cleaned and staff retrained on standard operating procedures for sanitation.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 05/03/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Waiting area displayed marijuana delivery devices

✓ **Steps taken in compliance** : Staff retrained on standard operating procedures for product placement.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/09/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Advertising visible to members of the public

✓ **Steps taken in compliance** : The advertising in question was the dispensary's COVID-19 policy that included the MMTC name and logo. The sign was immediately removed and new standard operating procedures were implemented, with staff retrained.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/24/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Advertising visible to members of the public

✓ **Steps taken in compliance** : The advertising in question was the dispensary's COVID-19 policy that included the MMTC name and logo. The sign was immediately removed and new standard operating procedures were implemented, with staff retrained.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/30/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Advertising visible to members of the public

✓ **Steps taken in compliance** : Covered logo that was visible.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 04/14/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Internal records visible to other patients.

✓ **Steps taken in compliance** : Extra partition added.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/01/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Incomplete manifest information

✓ **Steps taken in compliance** : Staff retained on standard operating procedures.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/09/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Internal records visible to other patients.

✓ **Steps taken in compliance** : Extra partition added.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/22/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Transportation manifests unavailable

✓ **Steps taken in compliance** : Electronic copies identified and moved to hard filing cabinet.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/23/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Internal records visible to other patients.

✓ **Steps taken in compliance** : Extra partition added.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 07/13/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Advertising usable products and allowing qualified patients and caregivers to place orders for dispensation of usable production at HeartJane.com.

✓ **Steps taken in compliance** : Filed for variance approval for use of iheartjane.com

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 07/14/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 07/20/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 07/20/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Advertising visible to members of the public

✓ **Steps taken in compliance** : Signage removed

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 08/20/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 08/31/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/02/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/08/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 01/11/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 01/19/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 02/01/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor video surveillance storage issue

✓ **Steps taken in compliance** : Repaired camera and provided documentation of 45-day video surveillance.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 02/22/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Physical security floor plan not available onsite.

✓ **Steps taken in compliance** : Submitted electronic copy

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 02/25/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Physical security floor plan not available onsite.

✓ **Steps taken in compliance** : Submitted electronic copy

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 02/25/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Physical security floor plan not available onsite.

✓ **Steps taken in compliance** : Submitted electronic copy

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/14/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Physical security floor plan not available onsite.

✓ **Steps taken in compliance** : Submitted electronic copy

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/22/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Consultation area not available

✓ **Steps taken in compliance** : Temporary placement of construction items removed.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/30/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor inventory control issue

✓ **Steps taken in compliance** : New tag numbers ordered and staff retrained on standard operating procedures.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 04/12/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Internal records visible to other patients.

✓ **Steps taken in compliance** : Extra partition added.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 04/12/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Qualified patients were able to place orders for medical marijuana from company website to be picked up at remote facilities.

✓ **Steps taken in compliance** : Discontinued remote product pickup locations.

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 04/27/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 05/06/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Receptacle does not have label firmly affixed.

✓ **Steps taken in compliance** : Retrain team on labeling compliance regulations.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 05/09/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor camera placement issue

✓ **Steps taken in compliance** : Adjusted camera angles and submitted new camera views.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/01/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Advertising visible to members of the public

✓ **Steps taken in compliance** : Advertising in question removed.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 07/21/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor waste management issue and minor camera placement issue.

✓ **Steps taken in compliance** : Updated waste logs and adjusted camera angles.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 08/02/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Display jars were stored outside vault

✓ **Steps taken in compliance** : Display jars relocated

✓ **Outcome of such disciplinary action** : Pending

✓ **Date action taken** : 08/03/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Plants of Ruskin, LLC

✓ **License Type:** Medical Marijuana Treatment Center

✓ **Licensing Board or Commission** : Florida Department of Health

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Physical security floor plan not available onsite.

✓ **Steps taken in compliance** : Submitted electronic copy

✓ **Outcome of such disciplinary action** : Pending

✓ **Date action taken** : 08/18/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Ataraxia, LLC

✓ **License Type:** Cultivation Center

✓ **Licensing Board or Commission** : Illinois Department of Agriculture

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Pesticide spraying after pistil formation

✓ **Steps taken in compliance** : Impacted material sent to extraction

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 04/25/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Ataraxia, LLC

✓ **License Type:** Cultivation

✓ **Licensing Board or Commission** : Illinois Department of Agriculture

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Food-grade solvent weighed more than indicated on material container

✓ **Steps taken in compliance** : Records updated

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/14/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** MME Evanston Retail, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Minor inventory issue

✓ **Steps taken in compliance** : Staff retrained to count inventory at time of delivery

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 02/07/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Elevele, LLC

✓ **License Type:** REGISTERED ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Minor inventory issue, failed to destroy quarantined product within seven calendar days

✓ **Steps taken in compliance** : Staff retrained on standard operating procedures for product destruction

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 10/13/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Elevele, LLC

✓ **License Type:** REGISTERED ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Floor plan modification

✓ **Steps taken in compliance** : Updated security floor plan sent to regulator and staff retrained.

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 10/26/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : List of service professional vendors not updated timely

✓ **Steps taken in compliance** : Vendor logs updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 07/03/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Patient education material not updated timely

✓ **Steps taken in compliance** : Patient education materials updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 05/21/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Agent training materials not updated timely

✓ **Steps taken in compliance** : Agent training materials updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 05/21/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORGAN

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : List of service professional vendors not updated timely

✓ **Steps taken in compliance** : Vendor logs updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 05/21/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : List of service professional vendors not updated timely

✓ **Steps taken in compliance** : Vendor logs updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 05/21/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Healthway Services of West Illinois, LLC

✓ **License Type:** REGISTERED MEDICAL CANNABIS DISPENSING ORGANIZATION & REGISTERED ADULT USE CANNABIS DISPENSING ORG

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Minor inventory issue

✓ **Steps taken in compliance** : Inventory reconciled and staff retrained on standard operating procedures

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 01/11/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** The Herbal Care Center, Inc.

✓ **License Type:** REGISTERED ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : Keys left in record cabinet

✓ **Steps taken in compliance** : Keys removed and staff retrained

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 12/07/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** The Herbal Care Center, Inc.

✓ **License Type:** REGISTERED ADULT USE CANNABIS DISPENSING ORGANIZATION

✓ **Licensing Board or Commission** : Illinois Department of Financial and Professional Regulation

✓ **Type of Disciplinary Measure** : Fine

✓ **Reason for the disciplinary action** : List of service professional vendors not updated timely

✓ **Steps taken in compliance** : Vendor logs updated

✓ **Outcome of such disciplinary action** : Minor fine

✓ **Date action taken** : 12/08/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Four Daughters Compassionate Care, Inc.

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : Massachusetts Cannabis Control Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor inventory and record keeping issues

✓ **Steps taken in compliance** : Full inventory audit performed and records updated

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 05/06/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Certificate of Occupancy not posted in visible area of facility

✓ **Steps taken in compliance** : Certificate of Occupancy posted in vestibule

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/06/2017

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor environmental and record keeping findings

✓ **Steps taken in compliance** : Containers appropriately labeled and 3-compartment sink installed.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 05/01/2017

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor inventory findings

✔ **Steps taken in compliance** : Inventory audit completed and it was determined the state's seed-to-sale system was not reporting correct inventory weights. Matter resolved.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 12/14/2017

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Temperature control device in transportation vehicle malfunctioning

✔ **Steps taken in compliance** : Temperature control device fixed

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 05/21/2018

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inventory and waste destruction findings

✔ **Steps taken in compliance** : Heightened inventory controls instituted through adoption of new standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 08/08/2018

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor waste destruction and environmental findings

✔ **Steps taken in compliance** : Waste logs updated and ammonium test strips added to 3-compartment sink.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 10/22/2018

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor waste destruction and security component findings.

✔ **Steps taken in compliance** : Updated waste logs and adjusted camera angles.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 10/22/2018

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor security component findings.

✔ **Steps taken in compliance** : Cage was added to the designated distribution area to create a separate enclosed, locked storage area and a refrigeration unit was added to the delivery vehicle.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 02/11/2019

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor waste destruction finding

✔ **Steps taken in compliance** : Waste logs updated.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 06/13/2019

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor inventory and environmental findings.

✔ **Steps taken in compliance** : Inventory updated in seed-to-sale system and external doors resealed with commercial weather stripping material.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 06/17/2019

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✔ **Licensing Board or Commission** : Nevada Cannabis Control Board

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor environmental findings.

✔ **Steps taken in compliance** : Base coverings were replaced, wall repatched, and floor repaired and sealed with epoxy.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 06/15/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Lone Mountain Partners, LLC

✔ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor environmental and storage findings.

✓ **Steps taken in compliance** : Added signage, moved and cleaned equipment.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/15/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor transportation finding.

✓ **Steps taken in compliance** : Car alarm repaired.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/15/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor delivery finding.

✓ **Steps taken in compliance** : Delivery discrepancy resolved and staff retrained on intake processes.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/02/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor environmental finding.

✓ **Steps taken in compliance** : Restocked paper towels, soap, and cleaned hand-washing sink.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/10/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Lone Mountain Partners, LLC

✓ **License Type:** Cultivation Facility and Manufacturing Facility

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor environmental finding.

✓ **Steps taken in compliance** : Restocked paper towels, soap, and cleaned handwashing sink.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/10/2021

- ✔ **Select One:** Related Cannabis Entity
- ✔ **Name:** Lone Mountain Partners, LLC
- ✔ **License Type:** Cultivation Facility and Manufacturing Facility
- ✔ **Licensing Board or Commission:** Nevada Cannabis Control Board
- ✔ **Type of Disciplinary Measure:** Other
- ✔ **Reason for the disciplinary action:** Minor inventory findings.
- ✔ **Steps taken in compliance:** Discrepancy resolved in seed-to-sale system and staff retrained on standard operating procedures for inventory counts.
- ✔ **Outcome of such disciplinary action:** No disciplinary action
- ✔ **Date action taken:** 01/27/2022

- ✔ **Select One:** Related Cannabis Entity
- ✔ **Name:** Lone Mountain Partners, LLC
- ✔ **License Type:** Cultivation Facility and Manufacturing Facility
- ✔ **Licensing Board or Commission:** Nevada Cannabis Control Board
- ✔ **Type of Disciplinary Measure:** Other
- ✔ **Reason for the disciplinary action:** Minor environmental finding.
- ✔ **Steps taken in compliance:** Staff retrained on hand washing and cleaning procedures.
- ✔ **Outcome of such disciplinary action:** No disciplinary action
- ✔ **Date action taken:** 03/10/2022

- ✔ **Select One:** Related Cannabis Entity
- ✔ **Name:** Lone Mountain Partners, LLC
- ✔ **License Type:** Cultivation Facility and Manufacturing Facility
- ✔ **Licensing Board or Commission:** Nevada Cannabis Control Board
- ✔ **Type of Disciplinary Measure:** Other
- ✔ **Reason for the disciplinary action:** Sample requests sent to wrong testing lab.
- ✔ **Steps taken in compliance:** Staff retrained on standard operating procedures for lab testing.
- ✔ **Outcome of such disciplinary action:** No disciplinary action
- ✔ **Date action taken:** 07/29/2022

- ✔ **Select One:** Related Cannabis Entity
- ✔ **Name:** Naturex, LLC
- ✔ **License Type:** Retail Store
- ✔ **Licensing Board or Commission:** Nevada Cannabis Control Board
- ✔ **Type of Disciplinary Measure:** Other
- ✔ **Reason for the disciplinary action:** Minor inventory findings from seed-to-sale system.
- ✔ **Steps taken in compliance:** Internal seed-to-sale system changed from MJ Freeway to Green bits and internal systematic discrepancies resolved.
- ✔ **Outcome of such disciplinary action:** No disciplinary action
- ✔ **Date action taken:** 04/16/2018

- ✔ **Select One:** Related Cannabis Entity
- ✔ **Name:** Naturex, LLC
- ✔ **License Type:** Retail Store
- ✔ **Licensing Board or Commission:** Nevada Cannabis Control Board
- ✔ **Type of Disciplinary Measure:** Other
- ✔ **Reason for the disciplinary action:** Improper sale.

✓ **Steps taken in compliance** : Incident report submitted and Denial of Sale form filed.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 08/26/2018

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Naturex, LLC

✓ **License Type:** Retail Store

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Expired facility license was posted instead of current license.

✓ **Steps taken in compliance** : License updated onsite.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 04/24/2019

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Naturex, LLC

✓ **License Type:** Retail Store

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Billboard advertisement missing required warning statements "Keep out of reach of Children"; and "For the use only by adults 21 years of age and older"

✓ **Steps taken in compliance** : Removed billboard advertising, created a new design, and submitted new design for approval.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 07/12/2021

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Naturex, LLC

✓ **License Type:** Retail Store

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor environmental findings.

✓ **Steps taken in compliance** : Surfaces sanitized and staff retrained on environmental standard operating procedures.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 03/11/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Naturex, LLC

✓ **License Type:** Retail Store

✓ **Licensing Board or Commission** : Nevada Cannabis Control Board

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Minor inventory findings and lapsed agent badge.

✓ **Steps taken in compliance** : Inventory discrepancy resolved and retained staff on agent badging process.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 06/01/2022

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Manifests were not shared with the NJ DOH following pickup/delivery

✓ **Steps taken in compliance** : Staff retrained on inventory receipt standard operating procedures

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/02/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Inaccurately entering inventory

✓ **Steps taken in compliance** : Staff retrained on inventory receipt standard operating procedures

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/04/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Newly manufactured product was not listed same day in Seed to Sale system.

✓ **Steps taken in compliance** : Staff met with NJ DOH to outline new procedure for product conversion.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 09/22/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Product stored overnight in secured production room.

✓ **Steps taken in compliance** : Staff retrained to store product in vault overnight.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 12/11/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✓ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✓ **Type of Disciplinary Measure** : Other

✓ **Reason for the disciplinary action** : Lab waste stored in a locked cage overnight in lab.

✓ **Steps taken in compliance** : Staff retrained to store waste in vault overnight.

✓ **Outcome of such disciplinary action** : No disciplinary action

✓ **Date action taken** : 12/11/2020

✓ **Select One:** Related Cannabis Entity

✓ **Name:** Verano NJ, LLC

✓ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Green waste was not immediately logged.

✔ **Steps taken in compliance** : Staff retrained and SOPs updated to reflect use of floor waste as extract material.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 12/11/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Bulk flower lot listed in Seed to Sale had inaccurate information

✔ **Steps taken in compliance** : System issue; employee re-training and service ticket filed with Seed to Sale system to resolve the issue.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 12/11/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Product designation incorrectly entered into Seed to Sale system.

✔ **Steps taken in compliance** : Issue corrected in system. Employee Retraining.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 02/03/2021

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Minor environmental finding

✔ **Steps taken in compliance** : Lot in question was destroyed and staff retrained

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 04/15/2021

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inventory sale finding.

✔ **Steps taken in compliance** : Product at issue was returned, additional inventory controls put into place, and staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 07/22/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Product received was not entered into Point of Sale system timely

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 07/31/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inaccurately entered customer purchase.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 07/31/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Unreported inventory error

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 08/04/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Patient profile inadvertently made for patient caregiver at dispensary.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 08/11/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inaccurately entered customer purchase.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 08/25/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inaccurately entered customer purchase.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 09/18/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inaccurately entered customer purchase.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 09/24/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inaccurately entered customer purchase.

✔ **Steps taken in compliance** : Staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 11/02/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inventory sale finding.

✔ **Steps taken in compliance** : Product at issue was returned, additional inventory controls put into place, and staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 11/22/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission

✔ **Type of Disciplinary Measure** : Other

✔ **Reason for the disciplinary action** : Inventory sale finding.

✔ **Steps taken in compliance** : Product at issue was returned, additional inventory controls put into place, and staff retrained on standard operating procedures.

✔ **Outcome of such disciplinary action** : No disciplinary action

✔ **Date action taken** : 12/28/2020

✔ **Select One:** Related Cannabis Entity

✔ **Name:** Verano NJ, LLC

✔ **License Type:** Vertical

- ✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission
 - ✔ **Type of Disciplinary Measure** : Other
 - ✔ **Reason for the disciplinary action** : Minor environmental findings and medical menus did not match adult-use menu offerings initially.
 - ✔ **Steps taken in compliance** : Menus mirrored and environmental issues resolved.
 - ✔ **Outcome of such disciplinary action** : No disciplinary action
 - ✔ **Date action taken** : 04/28/2022
-

- ✔ **Select One:** Related Cannabis Entity
 - ✔ **Name:** Verano NJ, LLC
 - ✔ **License Type:** Vertical
 - ✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission
 - ✔ **Type of Disciplinary Measure** : Other
 - ✔ **Reason for the disciplinary action** : Access card used by wrong individual working at the dispensary.
 - ✔ **Steps taken in compliance** : Additional card was deactivated and all staff were retrained on proper protocol.
 - ✔ **Outcome of such disciplinary action** : No disciplinary action
 - ✔ **Date action taken** : 04/21/2021
-

- ✔ **Select One:** Related Cannabis Entity
 - ✔ **Name:** Verano NJ, LLC
 - ✔ **License Type:** Vertical
 - ✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission
 - ✔ **Type of Disciplinary Measure** : Other
 - ✔ **Reason for the disciplinary action** : Newly hired security guard was observed in side of dispensary without proper ATC badge.
 - ✔ **Steps taken in compliance** : New security guards applied for agent badges.
 - ✔ **Outcome of such disciplinary action** : No disciplinary action
 - ✔ **Date action taken** : 04/21/2021
-

- ✔ **Select One:** Related Cannabis Entity
 - ✔ **Name:** Verano NJ, LLC
 - ✔ **License Type:** Vertical
 - ✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission
 - ✔ **Type of Disciplinary Measure** : Other
 - ✔ **Reason for the disciplinary action** : While receiving a product delivery, product was left in hallway and sales counter during intake.
 - ✔ **Steps taken in compliance** : Staff were retrained to take product to vault immediately during intake.
 - ✔ **Outcome of such disciplinary action** : No disciplinary action
 - ✔ **Date action taken** : 04/21/2021
-

- ✔ **Select One:** Related Cannabis Entity
 - ✔ **Name:** Verano NJ, LLC
 - ✔ **License Type:** Vertical
 - ✔ **Licensing Board or Commission** : New Jersey Cannabis Regulatory Commission
 - ✔ **Type of Disciplinary Measure** : Other
 - ✔ **Reason for the disciplinary action** : Delivered products were not immediately received/barcoded.
 - ✔ **Steps taken in compliance** : Product was returned to cultivator and staff retrained on proper intake process.
 - ✔ **Outcome of such disciplinary action** : No disciplinary action
 - ✔ **Date action taken** : 12/15/2021
-

✓ Has the applicant, any ownership entity, or any cannabis entity connected to any individual or entity with an ownership interest : NO
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?

✓ Has the applicant filed, or had filed against it, any proceeding for bankruptcy within the past 7 years?: NO

✓ Is the applicant currently, or has it been in the past 10 years, a defendant in litigation involving any of its business practices?: NO

✓ Is any public official of any unit of government: : NO
(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?

✓ Is the spouse, parent or child of a public official of any unit of government: : NO
(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?

✓ Has any owner, director, board member, or individual with a controlling interest in the applicant ever been indicted for, charged : NO
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?

✓ Has any leader, secure transport driver, or secure transport passenger of the applicant received a criminal conviction within the : NO
last eight years for any of the following:
(1) any indictable offense;
(2) any offense involving stolen property or vehicles;
(3) fraud relating to any business any driver has owned, in whole or part, or in which the driver has been employed;
(4) stolen property, or other offense of similar nature;
(5) operation of a motor vehicle while under the influence of a controlled substance, or offense of similar nature; or (6) any
offense involving possession, distribution or trafficking in, any illegal substance?

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?

✓

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

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

✓ Does the applicant consent as required by § 20-2A-55(d), Code of Alabama 1975 (as amended) to the inspections, : YES
examinations, searches, and seizures contemplated by § 20-2A-52(a)(3), Code of Alabama 1975 (as amended), which shall
specifically extend to all secure transport vehicles of the applicant?

✓ 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

✓ Signature: James Leventis

✓ Signature Date: 12/30/2022

Documents

✓ Resume or Curriculum Vitae of Individuals with Ownership Interest:

✓ Residency of Owners:

✓ Commercial Horticulture or Agronomic Production Experience of Owners:

✓ Criminal Background Check:

✓ Minimum Performance Bond Requirement:

✓ Minimum Liquid Assets Requirement:

✓ Demonstration of Sufficient Capital:

✓ Minimum Operating Capital Requirement:

✓ Financial Statements:

✓ Tax Plan:

✓ Business Formation Documents:

✓ Business License and Authorization of Local Jurisdictions:

✓ Business Plan:

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

✓ Coordination of Information from Registered Certifying Physicians:

✓ Point-of-Sale Responsibilities:

✓ Confidentiality of Patient Information:

- ✓ Money Handling and Taxes:

- ✓ Standard Operating Plan and Procedures:

- ✓ Policies and Procedures Manual:

- ✓ Production and Manufacturing Process:

- ✓ Machinery and Equipment:

- ✓ Receiving and Shipping Plan:

- ✓ Secure Transport Vehicles:

- ✓ Compliance with Alabama Public Service Commission Requirements:

- ✓ Commercial Drivers' License:

- ✓ Fleet Summary:

- ✓ Care and Maintenance of Vehicles:

- ✓ Route Plans:

- ✓ Plan for Segregation of Processes Within and Transportation Between Facilities:

- ✓ Facilities:

- ✓ Engineering Plans and Specifications:

- ✓ Security Plan:

- ✓ Personnel:

- ✓ Business Leadership Credentials:

- ✓ Employee Handbook:

- ✓ Secure Transport Drivers:

- ✓ Drivers' Manual:

- ✓ Quality Control and Quality Assurance Plan:

- ✓ Contamination and Recall Plan:

✓ **Marketing and Advertising Plan:**

✓ **Website and Social Media:**

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

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

✓ **Affidavit - Entity Applicant:**

Payments

✓ **Payment Options:** Credit Card

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

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.

James A. Leventis

Printed Name of Verifying Individual

Chief Compliance Officer

Title of Verifying Individual

James A. Leventis

Signature of Verifying Individual

3/3/2023

Verification Date

1.1 Resume or Curriculum Vitae of Individuals with Ownership Interest in Applicant

The Applicant has provided résumé or curriculum vitae of each individual with an ownership interest in the Applicant, showing, at a minimum, all institutions of higher education attended, including the date, location and type of any degree received; all residential addresses in the last 15 years; and the name, business address and telephone number of all employers in the last 15 years, including a contact person at each.

See attached FORM A - Ownership Resume-CV for Mary Margaret Lanier Long (identified as “FORM A - Ownership Resume-CV for Mary Margaret Lanier Long – Attachment to Exhibit 1, Section 1.1”) at pages 2 – 4.

Please also see attached FORM A - Ownership Resume-CV for George Archos (identified as “FORM A - Ownership Resume-CV for George Archos – Attachment to Exhibit 1, Section 1.1”) at pages 5 – 9.

FORM A - Ownership Resume-CV for Mary Margaret Lanier Long – Attachment to Exhibit 1,
Section 1.1

FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

<u>Verano Alabama, LLC</u>	<u>Integrated Facility</u>
Business License Applicant Name	License Type
<u>Mary Margaret Lanier Long</u>	<u>51</u>
Individual with Ownership Interest in Applicant	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.

Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		

Education

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

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

Employment History

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

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

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Form A: Ownership Resume / Curriculum Vitae
Page 4

FORM A - Ownership Resume-CV for George Archos – Attachment to Exhibit 1, Section 1.1

FORM A: OWNERSHIP RESUME / CURRICULUM VITAE

<u>Verano Alabama, LLC</u>	<u>Integrated Facility License</u>
Business License Applicant Name	License Type
<u>George Archos</u>	<u>9.16%</u>
Individual with Ownership Interest in Applicant	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.

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

Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY).
-----------------------------	----------------------------

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

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

Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
<hr/>		
City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		
Residential Street Address		
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City	State	Zip
<hr/>	<hr/>	<hr/>
Date Resided From (MM/YYYY)	Date Resided To (MM/YYYY)	
<hr/>		

Form A: Ownership Resume / Curriculum Vitae
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Education

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

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

Employment History

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

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

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Date Employed From (MM/YYYY)

Date Employed To (MM/YYYY)

Form A: Ownership Resume / Curriculum Vitae
Page 4

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
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1. Declaration of Exempt Information

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Exhibit 2 – Residency of Owners

Verification

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

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

5 Page Summary

Table of Contents

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2.10	<i>Attachment I 2015 Proof of Residency</i>	12
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2.13	<i>Attachment L 2012 Proof of Residency</i>	15
2.14	<i>Attachment M 2011 Proof of Residency</i>	16
2.15	<i>Attachment N 2010 Proof of Residency</i>	17
2.16	<i>Attachment O 2009 Proof of Residency</i>	18
2.17	<i>Attachment P 2008 Proof of Residency</i>	19
2.18	<i>Attachment Q 2007 Proof of Residency</i>	20

Per the **Darren Wesley “Ato” Hall Compassion Act (§ 20-2A-1, et seq., Ala. Code 1975) (“the Act”)** pursuant to **§20-2A-54.(a)(10)**, the Applicant has provided records indicating that a majority of ownership is attributable to an individual or individuals with proof of residence in this state for a continuous period of no less than 15 years preceding the application date.

2.2 **Residency Proof**

Mary Margaret Lanier Long,

Mary Margaret Lanier Long Driver’s License

The following documentation, indicates Property Appraisal and Tax Payments made by Mary for her primary residence for the last 15 years:

1. **Attachment B** | 2022 Proof of Residency
2. **Attachment C** | 2021 Proof of Residency
3. **Attachment D** | 2020 Proof of Residency
4. **Attachment E** | 2019 Proof of Residency
5. **Attachment F** | 2018 Proof of Residency
6. **Attachment G** | 2017 Proof of Residency
7. **Attachment H** | 2016 Proof of Residency
8. **Attachment I** | 2015 Proof of Residency
9. **Attachment J** | 2014 Proof of Residency
10. **Attachment K** | 2013 Proof of Residency
11. **Attachment L** | 2012 Proof of Residency
12. **Attachment M** | 2011 Proof of Residency
13. **Attachment N** | 2010 Proof of Residency
14. **Attachment O** | 2009 Proof of Residency
15. **Attachment P** | 2008 Proof of Residency, and
16. **Attachment Q** | 2007 Proof of Residency

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Exhibit 3 – Commercial Horticulture or Agronomic Production Experience of Owners

Verification

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

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

3.1 Five Page Summary

3.2 Table of Contents

3.1 Five Page Summary _____ **1**

3.2 Table of Contents _____ **1**

 3.2.1 Records Indicating Majority Ownership _____ **2**

 3.2.2 Total Commercial Horticulture Experience _____ **2**

3.3 Supporting Documents _____ **12**

Per the **Darren Wesley “Ato” Hall Compassion Act (§ 20-2A-1, et seq., Ala. Code 1975) (“the Act”)** pursuant to **§20-2A-54.(a)(11)**, for an applicant seeking an integrated facility license or a cultivator license, records indicating that a majority of ownership is attributable to an individual or individuals, or an entity or entities, with cumulative business experience in the field of commercial horticulture or agronomic production for a period of at least 15 years.

3.2.2 Total Commercial Horticulture Experience

Mary Margaret Lanier Long, a life-long Alabama resident, has farmed her entire adult life. With over **52 years** of total commercial horticulture and agronomic production experience, from 1970 to 2022, she has extensive experience farming corn, seed cotton, soybeans, wheat, and industrial hemp. Her total agriculture experience includes owning and operating her family farm in varied capacities and providing consulting and advisory services. She obtained her industrial hemp license from the Alabama Department of Agriculture in 2020, which is still in good standing.

The above image shows the land Mary owned and operated, indicated by the dashed red line. The blue dashed section of the family farm indicates the sale in 1997, and the green dashed portion sold in 2005. The highlighted blue area has been owned and operated by Mary from 1970 until today, where beans are still being grown. The below satellite image depicts the highlighted blue area where Mary produces beans under Farm 10079.

3.2.2.1 15-Year Agronomic Production Proof

Since 1970, Mary Margaret Lanier Long farmed her 2000-acre land

At 16, she was declared an adult by the State of Alabama following the tragic death of her parents. She petitioned the state for adulthood to farm the land and apply for loans for farming equipment. The Real Property Tax Notice document, depicted above, establishes the **parcel number** in conjunction with **Mary's name** and the **farm's address**.

3.2.2.1.1 *USDA Farm Service Agency Documentation*

The United States Department of Agriculture Farm Service Agency has provided the following document dated Mar 18, 2020,

The document specifies the division of the farm in which Mary leased a portion to a third party to which she provided agronomic production advisory services, including agronomic production systems selection, crop irrigation strategies, precision agriculture systems implementation, soil and water management strategies, nutrient management, and integrated pest management strategies. From 1970 until today, bean production remains the crop of choice.

3.2.2.2 15 Years of Agronomic Production Experience

Internal Revenue Service Tax Filings, Property Appraisal and Tax Payment documentation along with Acreage Reports were provided by USDA establishing residency and Agronomic Production Experience. Although Mary's total agriculture experience equates to 52 years, only a portion of those years is verifiable. She has farmed her entire life, but the following documentation provides the most apparent evidence of her farm management experience, including the plot's leasing.

3.2.2.3 3 Years of Hemp Agriculture Experience

Mary currently operates **MARY MARGARET LONG FARM**, in which she was granted a license in 2021 and started farming three acres in 2022. In June 2020, Mary was awarded a Hemp License from the State of Tennessee's Department of Agriculture through the Division of Consumer & Industry Services. On February 7, 2021, Mary was certified by the Alabama Department of Agriculture after passing her Private Applicator's Training Course. Alabama A&M extensions program coordinated the certification process led by Sanja B Thomas, Ph.D.

3.3 Supporting Documents

The following Attachments provide detailed proof of cumulative business experience in the field of commercial horticulture or agronomic production for a period of at least 15 years.

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Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 4– 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.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

Summary

The Applicant has ensured that each individual identified by § 20-2A-55(b), Code of Alabama 1975 has successfully requested a state criminal background check from the Alabama Law Enforcement Agency (ALEA) and a national criminal background check from the FBI.

Namely, in relation to the Applicant, the individuals identified by § 20-2A-55(b), Code of Alabama 1975 include:

- Mary Margaret Lanier Long (Owner & Chief Agricultural Officer)
- George Archos (Owner of Publicly Traded Company with 5% or more equity and CEO)

As such, what follows are the completed forms and proof of submission for each individual, including:

- FORM B: BACKGROUND CHECK APPLICANT VERIFICATION
- FORM C: STATE BACKGROUND CHECK (ALEA)
- FORM D: NATIONAL BACKGROUND CHECK (FBI)
- FORM E: BACKGROUND CHECK INDIVIDUAL VERIFICATION

Each individual above has completed all the forms and sent the completed form and required documents to the appropriate agencies.

4.1 FORM B: BACKGROUND CHECK APPLICANT VERIFICATION

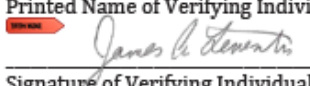
FORM B: BACKGROUND CHECK APPLICANT VERIFICATION

Verano Alabama, LLC Integrated Facility
 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)
Mary Margaret Lanier Long - Owner and Chief Agricultural Officer	<input checked="" type="checkbox"/> Owner <input checked="" type="checkbox"/> Shareholder <input type="checkbox"/> Director <input type="checkbox"/> Board Member <input type="checkbox"/> Individual with Economic Interest in Applicant
George Archos - Owner and CEO	<input checked="" type="checkbox"/> Owner <input checked="" 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
	<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.

James A. Leventis
 Printed Name of Verifying Individual

 Signature of Verifying Individual

Chief Compliance Officer
 Title of Verifying Individual
12/22/2022
 Verification Date

4.2 FORM C: STATE BACKGROUND CHECK (ALEA)

4.2.1 Mary Margaret Lanier Long | FORM C

SBI Form 46 Rev. 10-01-17

FORM 187474-0812

PNC BANK
PNC Bank, National Association
Alabama

No. [REDACTED] 21-10/830

CASHIER'S CHECK

DATE NOVEMBER 08, 2022

PAY TO THE ORDER OF CRIMINAL RECORDS & IDENTIFICATION UNIT \$ 25.00

TWENTY FIVE AND 00 / 100***** DOLLARS

MARY LANIER LONG

PNC Bank, National Association

[Signature]
OFFICIAL SIGNATURE

 MIX
Paper from
responsible sources
FSC® C106837



ALABAMA LAW ENFORCEMENT AGENCY
RECORDS AND IDENTIFICATION DIVISION
301 S. RIPLEY STREET / P.O. BOX 1511 / MONTGOMERY, AL 36102
PHONE 334.353.4340 / ALEA.GOV

KAY IVEY
GOVERNOR
HAL TAYLOR
SECRETARY

November 3rd, 2022

Dear Ms. Long,

Attached is a copy of your Alabama Criminal History Record Information (CHRI), as per your written request to the ALEA Criminal Justice Information Services Division. This CHRI includes identifying information on any arrests and/or dispositions related to your Alabama criminal history.

- Requests for any records associated with these charges, or an explanation of a charge or disposition, should be directed to the arresting agency or the court which contributed the information to your criminal record.
- Because additions or deletions to an individual's criminal history record may be made at any time, a new copy of your CHRI should be requested via the same procedure if it is needed at a later date.

Please do not hesitate to contact the Criminal Justice Information Services Division at 334-676-6000 if we may be of further assistance in this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "W. Avery Morris".

W. Avery Morris, CLEE
Operations Commander
Criminal Justice Information Services Division
Alabama State Bureau of Investigation

4.2.2 George Archos | FORM C

4.3 FORM D: NATIONAL BACKGROUND CHECK (FBI)

4.3.1 Mary Margaret Lanier Long | FORM D

UNITED STATES POSTAL SERVICE.
MADISON
56 HUGHES RD
MADISON, AL 35758-9998
(800)275-8777

11/08/2022 01:55 PM

Product	Qty	Unit Price	Price
PM Express 1-Day Montgomery, AL 36102 Weight: 0 lb 2.30 oz Signature Waiver Scheduled Delivery Date Wed 11/09/2022 06:00 PM Money Back Guarantee	1		\$27.50
Insurance Up to \$100.00 included			\$0.00
Total			\$27.50
Grand Total:			\$27.50

In a hurry? Self-service kiosks offer quick and easy check-out. Any Retail Associate can show you how.

Save this receipt as evidence of insurance. For information on filing an insurance claim go to <https://www.usps.com/help/claims.htm> or call 1-800-222-1811

Text your tracking number to 28777 (2USPS) to get the latest status. Standard Message and Data rates may apply. You may also visit www.usps.com USPS Tracking or call 1-800-222-1811.

Preview your Mail
Track your Packages
Sign up for FREE @ <https://informedelivery.usps.com>

All sales final on stamps and postage. Refunds for guaranteed services only. Thank you for your business.

Tell us about your experience. Go to: <https://postalexperience.com/Pos> or scan this code with your mobile device.

or call 1-800-410-7420.



mary long

Identity History Summary Request Confirmation

1 message

Criminal Justice Information Services <edo@services.fbi.gov>
To:

Tue, Nov 1, 2022 at 4:37 PM

Your Identity History Summary Request has been accepted and will be processed in the date order in which it was received.

Mary Margaret Lanier Long

You indicated your fingerprints would be delivered by: MAIL

Please refer to the following details when submitting your fingerprints:

If delivering your fingerprints via Mail, please send your completed fingerprint card along with a copy of this confirmation email to:

FBI CJIS Division
ATTN: ELECTRONIC SUMMARY REQUEST
1000 Custer Hollow Road
Clarksburg, West Virginia 26306

If you have any questions regarding this e-mail contact 304-625-5590 or identity@fbi.gov

This message has been transmitted to you by the FBI Criminal Justice Information Services Division. If you are not the intended recipient of this message, please destroy it promptly without any retention, dissemination, or reproduction (unless required by law), and please notify the sender of the error immediately by separate e-mail to identity@fbi.gov or by calling the Customer Service Group at 304-625-5590.
This is an automated message. Please do not reply to this e-mail.



Address: 490 PRODUCTION
AVENUE
MADISON
AL 35758
Location: HSYA
Device ID: -BTC02

FedEx 2Day

0.15 lb (M) 27.41
Declared Value 0
Recipient Address:
FBI CJIS DIVISION
ELECTRONICS SUMMARY REQUEST
1000 CUSTER HOLLOW RD
Clarksburg, WV 26306
000000000
Scheduled Delivery Date 11/4/2022
Pricing option:
STANDARD RATE
Package Information:
FedEx Envelope
Shipment subtotal: \$27.41
Total Due: \$27.41

M = Weight entered manually
S = Weight read from scale
T = Taxable item

Terms and Conditions apply. See
fedex.com/serviceguide for details.




We value your feedback!
Tell us how we're doing!
fedex.com/fscfeedback



*** Thank you ***


Visit us at: fedex.com
Or call 1.800.GoFedEx
1 800 463 3339

Proof of Fingerprint (FBI) - Mary L


Your Identity History Summary Request

 **mary long** 
 Wed 11/9/2022 1:00 PM

----- Forwarded message -----
From: **Criminal Justice Information Services** <edo@services.fbi.gov>
Date: Wed, Nov 9, 2022 at 12:55 PM
Subject: Your Identity History Summary Request


Your fingerprint card has been received for your Identity History Summary Request and will be processed in the date order in which it was received.

Mary Margaret Lanier Long


If you have any questions regarding this e-mail contact 304-625-5590 or identity@fbi.gov

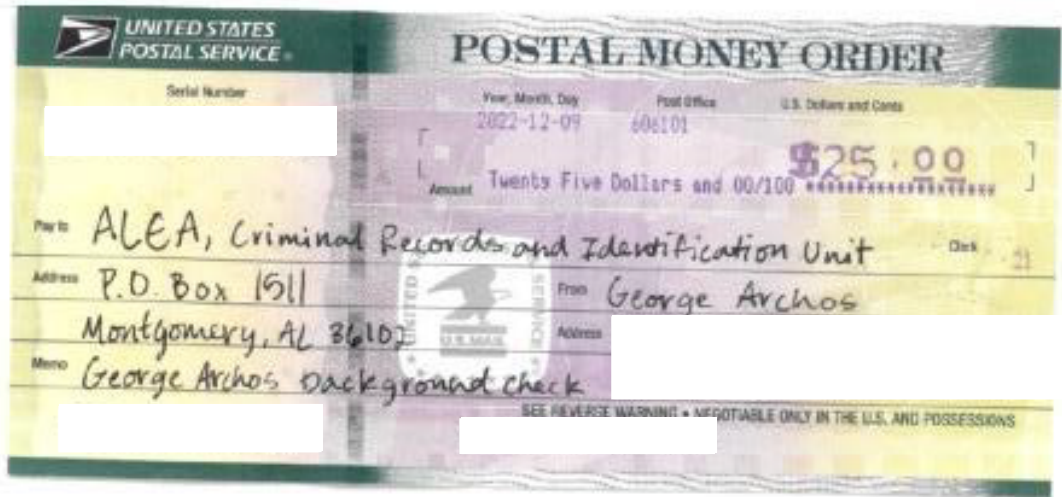
This message has been transmitted to you by the FBI Criminal Justice Information Services Division. If you are not the intended recipient of this message, please destroy it promptly without any retention, dissemination, or reproduction (unless required by law), and please notify the sender of the error immediately by separate e-mail to identity@fbi.gov or by calling the Customer Service Group at 304-625-5590.

This is an automated message. Please do not reply to this e-mail.

4.3.2 George Archos | FORM D

1-783 (Rev. 06-01-2020)

OMB-1110-0052



4.4 FORM: E BACKGROUND CHECK INDIVIDUAL VERIFICATION

4.4.1 Mary Margaret Lanier Long | FORM E

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.

Verano Alabama, LLC

Integrated Facility

Business License Applicant Name

License Type

Mary Margaret Lanier Long

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.

12/30/2022

Verification Date

4.4.2 George Archos | FORM E

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.

Verano Alabama, LLC

Integrated Facility

Business License Applicant Name

License Type

George Archos

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.

Signature of Verifying Individual

12/14/22
Verification Date

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
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Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 5 – Minimum Performance Bond Requirements

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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

5.1 Introduction

Below the Applicant provides *Form M - Surety Verification of Applicant Qualification for Bond* as evidence of its ability to secure a performance bond issued by a surety insurance company acceptable to the Commission, possessing at minimum an A rating, in the amount of at least two million dollars (\$2,000,000) (identified as “Form M - Surety Verification of Applicant Qualification for Bond – Attachment to Exhibit 5, Section 5.1”)

Form M - Surety Verification of Applicant Qualification for Bond – Attachment to Exhibit 5, Section 5.1

FORM M: Surety Verification of Applicant Qualification for Integrated Facility Performance Bond

Section A – Applicant Information (to be completed by Applicant)

Verano Alabama, LLC James Leventis
Integrated Facility Applicant Contact Person

641 S Lawrence St.
Applicant Address

Montgomery AL 36104
City State Zip

Phone Email

Section B – Surety Information (to be completed by Surety)

United States Fire Insurance Company
Surety Company

Section C – Surety Verification (to be completed by Surety)

The Surety identified in Section B, by and through its authorized representative, hereby verifies the following statements, as indicated by the initials of the authorized representative.

JMN The Applicant has requested that the Surety provide a professional opinion as to the Applicant’s qualifications for the Integrated Facility Performance Bond required by the Alabama Medical Cannabis Commission.

**Surety Verification of Applicant Qualifications for
Integrated Facility Performance Bond – Page 2**

JMN The Surety has reviewed and understands all obligations required by the Integrated Facility Performance Bond (Alabama Medical Cannabis Commission FORM F).

JMN The Surety has considered all available business information pertinent to the Surety's underwriting requirements regarding the Applicant, in the context of the Integrated Facility Performance Bond, and the Surety hereby confirms the Applicant possesses the requisite qualifications such that Applicant currently qualifies for the Integrated Facility Performance Bond required by the Alabama Medical Cannabis Commission.

JMN The Surety, in the event that the Applicant is awarded an Integrated Facility license by the Alabama Medical Cannabis Commission, will be prepared to execute the Integrated Facility Performance Bond, in the amount of \$2,000,000, contingent upon execution of bond agreements, delivery of collateral security, payment of premium and fees, and Applicant's satisfaction of the Surety's underwriting considerations at the time of the Bond request.

JMN The Surety acknowledges and understands that the Integrated Facility Performance Bond must be fully executed and filed with the Alabama Medical Cannabis Commission on or before the date set by the Commission for issuance of any Integrated Facility license awarded to the Applicant.

JMN The Surety's consideration and issuance of bonds is a matter solely between the Surety and the Applicant, and the Surety assumes no liability to third parties, including the Alabama Medical Cannabis Commission, by executing this Surety Verification of Applicant Qualifications for Integrated Facility Performance Bond.

JMN The Surety possesses, at a minimum, an A- rating and verified proof of such rating is attached hereto.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

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Exhibit 6 – Minimum Liquid Assets Requirement

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.

James A. Leventis
Printed Name of Verifying Individual

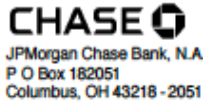
Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

6.1 Introduction:

To assure financial stability and meet the minimum liquid assets requirement, the Applicant has set up a separate Alabama entity bank account that has \$250,000 in liquid assets illustrated below by the December 2023 bank statement.



November 21, 2022 through November 30, 2022

VERANO ALABAMA, LLC

CUSTOMER SERVICE INFORMATION

Web site: Chase.com
 Service Center: 1-800-242-7338
 Para Espanol: 1-888-622-4273
 International Calls: 1-713-262-1679

CHECKING SUMMARY Chase Business Complete Checking

	INSTANCES	AMOUNT
Beginning Balance		\$0.00
Deposits and Additions	1	250,000.00
Ending Balance	1	\$250,000.00

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
Total Deposits and Additions		\$250,000.00

DAILY ENDING BALANCE

DATE	AMOUNT
11/30	\$250,000.00

IN CASE OF ERRORS OR QUESTIONS ABOUT YOUR ELECTRONIC FUNDS TRANSFERS:

Call us at 1-866-564-2262 or write us at the address on the front of this statement immediately if you think your statement or receipt is incorrect or if you need more information about a transfer listed on the statement or receipt.

For personal accounts only: We must hear from you no later than 60 days after we sent you the FIRST statement on which the problem or error appeared. Be prepared to give us the following information:

- Your name and account number;
- A description of the error or the transaction you are unsure about, and why you think it is an error or want more information; and
- The amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days (or 20 business days for new accounts) to do this, we will credit your account for the amount you think is in error so that you will have use of the money during the time it takes us to complete our investigation.

For business accounts, see your deposit account agreement or other applicable agreements that govern your account for details.

IN CASE OF ERRORS OR QUESTIONS ABOUT NON-ELECTRONIC FUNDS TRANSFERS: Contact us immediately if your statement is incorrect or if you need more information about any non-electronic funds transfers on this statement. For more details, see your deposit account agreement or other applicable agreements that govern your account.

JPMorgan Chase Bank, N.A. Member FDIC

6.2 Revolving Credit Note:

In addition to the minimum liquid asset's requirement, the Applicant has obtained a \$30,000,000 in the form of a Revolving Credit Note supported by Bank Statements, below. This capital will ensure our ability to secure our facilities and become operational well within the required timeframe. Based on our conservative projections, this amount will not only cover construction, build-out costs, and expenses but also operational expenses for all facilities until cashflow positive (with ample reserves in the event of an unforeseen emergency). We know this because our ownership, management, and third-party consultancy teams include individuals who have built, managed, and operated cannabis and non-cannabis businesses across the United States.

6.3 Bank Accounts:

A snapshot of the bank account balances is below followed by screenshots of the actual balances:

BANK ACCOUNTS	
	\$9,826,243
Chase - Alabama Account	\$250,000
	\$17,682,787
	\$364,238
	\$3,059,539
BANK ACCOUNT BALANCES TO SUPPORT REVOLVING CREDIT NOTE	\$31,182,807

The Bank Account summaries and a photo of each bank account adds up to \$31,182,807 which adequately covers the \$30,000,000 Revolving Credit Note.

Continued on Next Page



NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

Continued on Next Page



NOTICE: SEE REVERSE SIDE FOR IMPORTANT INFORMATION

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

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Exhibit 7 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

7.1 Introduction:

The Applicant will bring substantial financial and operational resources to Alabama. The following exhibit demonstrates the Applicant’s solvency, stability, suitability, and capability for starting and operating an Integrated Facility. The Applicant’s access to financial and human capital will serve as the foundation needed to build out a state-of-the-art facility, implement fully integrated, compliant security systems and protocols, and recruit and train qualified local staff to ensure safe and secure operations while adhering to strict regulatory and operational compliance. To assure financial stability, the Applicant has raised **\$30,000,000** in committed and liquid capital in the form of a Revolving Credit Note with the Applicant’s ownership entity (one of the top three largest publicly traded cannabis companies in the world).

As proof of funds, the Applicant provides bank statements from the funder (i.e. the Applicant’s ownership entity).

PROJECT COST SUMMARY	
Revolving Credit Note	\$30,000,000
Less: Application Fee	(\$2,500)
Less:	(\$3,125,000)
Less:	(\$6,018,520)
Less:	(\$791,100)
Less:	(\$924,000)
Less:	(\$685,000)
Less:	(\$745,000)
Less:	(\$759,000)
Less:	(\$30,000)
Less:	(\$2,000,000)
BANK ACCOUNT BALANCE POST GO-LIVE	\$14,919,880

The capital is far in excess to what is needed to secure facilities and become operational well within the required timeframe.

To demonstrate the adequacy of these funds, included below are highlights from a detailed pro forma forecast showing, among other things, projected capital and operational expenditures, revenues, taxes, and cash flow. The comprehensive financial model contains inputs and assumptions from proprietary and publicly available industry data, U.S. Census Bureau Data, and the owners’ experience creating and running thriving businesses. But first, the Applicant will show proof of the Revolving Line of Credit as well as proof of funds in the form of bank accounts.

7.2 Bank Accounts:

A snapshot of the bank account balances on the right is followed by screenshots of the actual balances. Once awarded the funds from these accounts will be transferred to the Applicant’s Chase account. On the right are proof of funds in the form of the bank accounts of the funding source showing liquid, available, and unencumbered funds of \$31,182,807, which is greater than the \$30,000,000 Revolving Credit Note shown above.

BANK ACCOUNTS	
Chase - Alabama Account	\$9,826,243
	\$250,000
	\$17,682,787
	\$364,238
	\$3,059,539
BANK ACCOUNT BALANCES TO SUPPORT REVOLVING CREDIT NOTE	
	\$31,182,807

7.3 Annual Operating


Figures:

On the next page is an annualized Income Statement and Cash Flow Statement for the first five full years of operations. As demonstrated in the model, the Applicant’s has far in excess the capital needed to start and operating an Integrated Facility in Alabama.

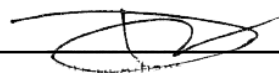
7.4 Verification of Sufficient Capital

A signed letter from an independent Certified Public Accounting (see attached document identified as “Independent Certified Public Accountant Letter – Attachment to Exhibit 7, Section 7.5”) demonstrates that the Applicant possesses sufficient capital that far exceeds

the total of the Applicant’s annual budgets or projected annual budgets during the first three full years after a license is issued to the Applicant. By signing below, the demonstration of sufficient capital available to the Applicant, as well as the source thereof, is verified by a responsible person designated by the Applicant, the Applicant’s contact person, and an independent Certified Public Accountant:



Signature of Contact Person



Signature of Responsible Person



Signature of Certified Public Accountant

03/03/2023

Verification Date

7.5 Conclusion

As demonstrated above, the Applicant has beyond sufficient capital, as defined by the Commission, to fund the buildout and operations of its Integrated Facility. The \$30,000,000 in committed and liquid capital is almost double the predicted sufficient capital requirements, and this will allow the Applicant to bring a world-class medical cannabis establishment to Alabama.

Independent Certified Public Accountant Letter – Attachment to Exhibit 7, Section 7.5

Matt H. Goldstick, CPA

December 25, 2022

Re: Verano Alabama, LLC
Demonstration of Sufficient Capital

To whom it may concern,

Please allow this letter to serve as verification that **Verano Alabama, LLC** (“Applicant”), as of **12.25.22**, has demonstrated sufficient capital available to execute its plans in Alabama. I have reviewed the Applicant’s financial documents, including the source of funds, and verify that the Applicant has the financial ability to begin and maintain operations of its Dispensary in Alabama.

Sincerely,

Matt Goldstick

Matt H. Goldstick
Certified Public Accountant
Solo Practitioner

Member:
American Institute of Certified Public Accountants
Illinois CPA Society

1. Declaration of Exempt Information

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Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 8 – Minimum Operating Capital Requirement

Verification

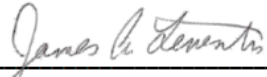
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

8.1 Introduction

The required capital for buildout and two years of operating expenses following the date the application is accepted by the Commission equates to \$15,080,120. Covered in greater detail in Exhibit 7, the Applicant has committed **\$30,000,000** in the form of a Revolving Credit Note with the Applicant’s ownership entity (i.e. one of the top three largest publicly traded cannabis companies in the world). This capital will ensure the ability to secure facilities and become operational well within the required timeframe. Based on conservative projections, this amount will cover construction, build-out costs, and operational expenses for the 60,000 square foot cultivation/processing facility and five retail dispensaries until cashflow positive (with ample reserves in the event of an unforeseen emergency). The ownership, management, and third-party consultancy teams include individuals who have built, managed, and operated cannabis and non-cannabis businesses across the United States and have verified the projections. To demonstrate the adequacy of these funds, included below are highlights from a detailed pro forma forecast showing, among other things, projected capital and operational expenditures, revenues, taxes, and cash flow. The comprehensive financial model contains inputs and assumptions taken from proprietary and publicly available industry data, U.S. Census Bureau Data, and the owners’ experience creating and running thriving and successful businesses. Although cashflow from operations will be capable of funding the overwhelming majority of the first-year operating expenses, this section will prove that the Applicant has the financial ability to maintain start up, construction and operations from the date the application is accepted through the entirety of operations with ample reserves in place to cover any unexpected costs or expenses to maintain business viability.

8.2 Capitalization

To support the Revolving Credit Note, the Applicant’s funder has bank accounts that serve as proof of funds for the \$30,000,000

BANK	
	\$9,826,243
Chase - Alabama Account	\$250,000
	17,682,787
	\$364,238
Valley Account	\$3,059,539
BANK ACCOUNT BALANCES TO SUPPORT REVOLVING CREDIT NOTE	\$31,182,807

commitment. No debt is anticipated to be necessary for the Applicant’s operation. Given the proposed cost structure and access to capital, the Applicant can cover all capital expenses while maintaining significant operational reserves without need for any further capital injections should the Applicant not generate revenue due to unforeseeable circumstances. Furthermore, the funding structure ensures the ability to financially support the estimated plan to become operational within 60 days of the date of provisional licensure.

8.3 Capital Expenditures

PROJECT COST SUMMARY	
Revolving Credit Note	\$30,000,000
Less: Application Fee	(\$2,500)
Less:	(\$3,125,000)
Less:	(\$6,018,520)
Less:	(\$791,100)
Less:	(\$924,000)
Less:	(\$685,000)
Less:	(\$745,000)
Less:	(\$759,000)
Less:	(\$30,000)
Less:	(\$2,000,000)
BANK ACCOUNT BALANCE POST GO-LIVE	\$14,919,880

Upon completion of the buildout of all facilities, including application fees, property costs, vehicle purchase and the minimum cash balance, the Applicant will have over \$14.9 million in the bank accounts upon the commencement of operations.

8.3.1 Property Costs

8.3.2 Cultivation and Processing Costs

The Applicant will design and build out a state-of-the-art cultivation and processing facility.

To meet the guidelines of the Act and be operational within 60 days of the award of the license,

8.3.3 Dispensary Costs

The Applicant intends to build out five dispensary facilities upon award and while the real estate costs are highlighted above, to the right are the specific costs for each facility. For an example of what a specific dispensary facility costs, the site-specific costs for the Montgomery facility are depicted on the last chart on the right.

8.4 Revenue Assumptions

Since the Applicant will fully utilize its authorizations under an Integrated Facility license, the Applicant breaks down its revenue projections from each of its operations and services, including cultivation, processing, transportation, and dispensary.

8.4.1 Cultivation

8.4.2 Processing

The chart to the right summarizes the Applicant's projections for revenue generated from its processing operations. The Applicant plans to process and produce all of the permitted types of medical cannabis products in Alabama in the ratios shown.

8.4.3 Dispensary

In order to determine the number of medical cannabis users in the state, a straight-line approach was utilized that is agnostic to location and is more specific to what typical dispensaries in other markets are able to generate in revenue. The locations of the Applicant's dispensaries are in well populated areas that will drive business. The following section describes the conservative assumptions the Applicant used to project its dispensaries revenue.

Alabama Dispensary Outlook – The Applicant believes the program will be a success; and therefore, wants to show an accurate depiction of what the dispensary outlook could look like. That said, the Applicant assume the state will continue to award more licenses.

8.4.4 Secure Transporter

The Applicant will also offer Secured Transportation, in accordance with Chapter 7, as a service to other licensees for a fee.

8.5 Operating Expenses

Section 8.5 meticulously details the Applicant's estimated operating expenses for its Integrated Facility.

8.5.1 Cultivation and Processing

Operating Expenses

The Applicant's cultivation and operating expenses consists of employee wages, utilities, equipment lease, seed-to-sale tracking system fees, nutrients, supplies, packaging, and more (as summarized in the chart on the right).

8.5.2 Dispensary Operating

Expenses

The Applicant is an experienced operator all throughout the United States with over 125 cannabis retail stores that are currently in operations today. As a result, the operations assumptions are sound, and the Applicant has no concerns of attaining these results.

The table at the upper right are the typical operations expense for a dispensary (keeping in mind that rent is site specific).

8.5.3 Transportation Operating Expenses

The Applicant's operating expenses from its transportation operations include employee wages, gas, insurance, maintenance, and more.

8.5.4 Taxes

No discussion of capital requirements is complete without accounting for taxes paid. The Applicant will comply with all tax requirements of § 20-2A-80, including the 9% medical cannabis sales tax and annual privilege tax. Additionally, the Applicant will include federal income tax, in compliance with IRS tax code 280E, as well as local sales taxes from the State, county, and city.

8.6 Annual Summary

All the information described above is summarized in the chart on the following page. More specifically, the chart on the following page summarizes all revenues, costs, expenses, taxes, depreciation, cash flow, and funds available for distribution for five years of operations.

8.7 Conclusion

In conclusion, the Applicant meets and far exceeds the minimum operating capital requirements for an Integrated Facility. The Applicant's multi-state experience and financial backing from its ownership entity (i.e. a top three largest publicly traded cannabis company in the world) far exceed the minimum criteria of Exhibit 8.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
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Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
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Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Confidential – Exempt from Public Disclosure

License Type: Integrated Facility

Exhibit 9 – Financial Statements

Verification

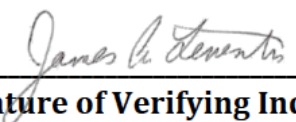
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Introduction

The following financial statements were developed in collaboration with the Applicant's CFO (a CPA that specializes in the cannabis industry) and industry experts based on data collected from the Applicant's multi-state cannabis operations in 17 U.S. States. The information found in these three financial statements demonstrate the Applicant's financial health and earnings potential. The data found on these financial statements are also used to calculate financial ratios used to provide further insight on the Applicant's financial performance and identify potential issues before they occur (described in Section 9.5). The three statements are interconnected and together the statements provide a comprehensive description of the Applicant's future integrated facility's operations and finances. What follows is a meticulous account of the Applicant's balance sheet, profit and loss report, and state of cash flow, as well as detailed step-by-step calculations that walk you through how each figure is arrived at.

9.1 Balance Sheet Report

The Applicant's balance sheet demonstrates the Applicant's assets, liabilities, and shareholder equity over the first three calendar years (the year of commencement plus three more) following the commencement of operations. In other words, the Applicant's balance sheet provides a snapshot of what the Applicant owns and owes, as well as the amount invested by shareholders. As will be demonstrated throughout, the Applicant's balance sheet is directly related to the profit and loss report and statement of cash flow. Below is a snapshot of the Applicant's value of assets, liabilities, and equity at commencement and for each of the first three calendar years, as of December 31 of each year.

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License Type: Integrated Facility

In summary, the Applicant's cash and cash equivalents at commencement will equal \$30,000,000, in the form of a revolving line of credit with the Applicant's ownership entity (i.e. top three largest cannabis company in the world).

These capital expenditures are shown as assets in the balance sheet as

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Property Plant and Equipment (PPE).

License Type: Integrated Facility

This conservative valuation is based on the Applicant’s experience operating in 17 U.S. States and extensive dealings in cannabis mergers and acquisitions. The intrinsic value of the license is balanced by the members equity and increases over the years to align with the increased revenue, value, and cash flow of the Applicant’s operations. Since the Applicant’s capital expenditures for property, plant, and equipment is an integral part of the Applicant’s financial statements, the Applicant provides a detailed description of its capital expenditures to acquire PPE assets below.

9.1.1 Property, Plant, and Equipment Assets

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License Type: Integrated Facility

The Applicant has executed an equipment lease agreement demonstrating possessory interest of machinery and equipment to be used in the cultivation and processing of medical cannabis.

9.1.1.1 Cultivation and Processing Assets

The Applicant will design and build out a state-of-the-art cultivation and processing facility.

To meet the guidelines of the Act and be operational within 60 days of the award of the license, the Applicant

The cultivation and processing costs are summarized on the charts below.

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License Type: Integrated Facility

SITE SPECIFIC DISPENSARY - BUILD OUT COSTS

- Dispensary - Montgomery
- Dispensary - Birmingham
- Dispensary - Dothan
- Dispensary - Tuscaloosa
- Dispensary - Decatur

TOTAL - DISPENSARY - BUILD OUT

9.1.1.2 Dispensary Assets

The Applicant intends to build out five dispensary facilities upon award and while the real estate costs are highlighted above, to the right are the specific costs for each facility. For an example of what a specific dispensary facility costs, the site-specific costs for the Montgomery facility are depicted on the last chart on the right. While the above summary covers the increases and decreases in the Applicant’s assets and liabilities, the following detailed descriptions of the profit and loss report and the statement of cashflow will paint a full picture of the Applicant’s finance. All three statements are intertwined, and the next two financial statements will provide further insights into the Applicants balance sheet.

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License Type: Integrated Facility

9.2 Profit and Loss Report

Below is a summary of the Applicant's estimated income, expenses, and net profit from inception to date of commencement and as projected over each calendar year thereafter, including the year of commencement.

9.2.1 Revenue Assumptions

Since the Applicant will fully utilize its authorizations under an Integrated Facility license, the Applicant breaks down its revenue projections from each of its operations and services, including cultivation, processing, transportation, and dispensary.

9.2.1.1 Cultivation

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License Type: Integrated Facility

9.2.1.2 Processing

The chart to the right summarizes the Applicant’s projections for revenue generated from its processing operations. The Applicant plans to process and produce all of the permitted types of medical cannabis products in Alabama in the ratios shown.

Actual wholesale pricing data of each product that the Applicant produces are as follows:

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License Type: Integrated Facility

9.2.1.3 Dispensary

In order to determine the number of medical cannabis users in the state, a straight-line approach was utilized that is agnostic to location and is more specific to what typical dispensaries in other markets are able to generate in revenue. The locations of the Applicant's dispensaries are in well populated areas that will drive business. The following section describes the conservative assumptions the Applicant used to project its dispensaries revenue.

Alabama Dispensary Outlook – The Applicant believes the program will be a success; and therefore, wants to show an accurate depiction of what the dispensary outlook could look like. That said, the Applicant assume the state will continue to award more licenses.

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License Type: Integrated Facility

9.2.1.4 Secure Transporter

The Applicant will also offer Secured Transportation, in accordance with Chapter 7, as a service to other licensees for a fee.

9.2.2 Expenses

Section 9.3.2 meticulously details the Applicant’s expenses for its Integrated Facility.

9.2.2.1 Cultivation and Processing Operating Expenses

The Applicant’s cultivation and operating expenses consists of employee wages, utilities, equipment lease, seed-to-sale tracking system fees, nutrients, supplies, packaging, and more (as summarized in the chart on the following page).

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License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

9.2.2.2 Dispensary Operating Expenses

The Applicant is an experienced operator all throughout the United States with over 125 cannabis retail stores that are currently in operations today. As a result, the operations assumptions are sound, and the Applicant has no concerns of attaining these results.

The table at the upper right are the typical operations expense for a dispensary (keeping in mind that rent is site specific).

9.2.2.3 Transportation Operating Expenses

The Applicant's operating expenses from its transportation operations include employee wages, gas, insurance, maintenance, and more. Based on the Applicant's years of cannabis industry experience,

9.2.3 Taxes

To get to net profit, no discussion is complete without accounting for taxes paid. The Applicant will comply with all tax requirements of § 20-2A-80, including the 9% medical cannabis sales tax and annual privilege tax. Additionally, the Applicant's taxes include federal income tax, in compliance with IRS tax code 280E, as well as local sales taxes from the State, county, and city.

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License Type: Integrated Facility

9.2.4 Net profit

All the information described above is summarized in the profit and loss report below. More specifically, the chart below summarizes any income, expenses, and net profit from the Applicant's inception to date of commencement and as projected over each calendar year thereafter, including the year of commencement.

Finally, now with the net income calculations described, the Applicant will describe how to calculate the cash flow by making adjustments to the net income, as described in the state of cash flow section below.

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License Type: Integrated Facility

9.3 Statement of Cash Flow

The Applicant's cash flow statement summarizes the movement of cash and cash equivalents that will flow in and out of the company. The cash flow statement complements the balance sheet and profit and loss reports described above, and as will be shown, it demonstrates the Applicant's superior ability to manages its cash position. The Applicant's statement of cash flow is mainly comprised of cash flow from its operating activities, which includes sources and uses of cash from the Applicant's cultivation, processing, dispensing, and transportation operations and activities. In short, it demonstrates how much cash is generated from the Applicant's integrated facility.

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License Type: Integrated Facility

9.4 Ratio analysis of financial statements

For further analysis into the Applicant's financial statements, what follows is a ratio analysis providing insights into the Applicant's liquidity, operational efficiency, and profitability.

Balance Sheet – To gauge the efficiency of the Applicant's balance sheet, the Applicant will utilize the asset turnover ratio. The asset turnover ratio measures the efficiency of a

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

company's assets in generating revenue or sales. It compares the dollar amount of sales to its total assets as an annualized percentage.

Profit and loss report - Key ratios used for analyzing the income statement include gross margin, operating margin, and net margin.

Thus, the Applicant's operations demonstrate significant margins, operational efficiency, and profitability that increases over the years.

Cash flow statement ratios - The Applicant uses the cash flow margin ratio to derive insights from its cash flow statements. The Applicant's cash flow margin ratio is calculated as cash flow from operations divided by sales. This metric gives a clear picture of the amount of cash generated per dollar of sales.

9.5 Conclusion

In summary, the Applicant's financial statements demonstrate the Applicant's solvency, stability, suitability, capability, projected efficiency, and experience in starting, operating, and managing a financially secure cannabis company. The Applicant meticulously detailed its balance sheet, profit and loss report, and cash flow statements. In addition, the Applicant went above the minimum criteria of Exhibit 9 by included a ratio analysis of its three financial statements, providing a comprehensive look at the Applicant's finances.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
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Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Within and Transportation Between Facilities			
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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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License Type: Integrated Facility

Exhibit 10 – 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.

James A. Leventis

Printed Name of Verifying Individual

Chief Compliance Officer

Title of Verifying Individual



Signature of Verifying Individual

3/3/2023

Verification Date

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

10.1 Introduction

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. To ensure complete tax compliance, the Applicant's Chief Financial Officer (CFO) is a Certified Public Accountant (CPA) that specializes in the cannabis industry, including federal, state, and local tax laws. On the fifth business day of each month, the Applicant's CFO/CPA will close the books of the prior month and ensure that all receipts, transactions, deposits, and cash on hand equal the correct amounts.

10.2 Sales tax

Medical Cannabis Sales Tax - The Applicant acknowledges that, pursuant to **§ 20-2A-80.(a)**, commencing January 1, 2022, there is levied, in addition to all other taxes of every kind now imposed by law, and shall be collected and remitted in accordance with Article 1, commencing with Section 40-23-1, of Chapter 23 of Title 40, a tax on the gross proceeds of the sales of medical cannabis when sold at retail in Alabama at an excise tax rate of nine percent (9%) of the gross proceeds of the sales. The Applicant will compute gross proceeds in accordance with the definition provided in **§ 40-23-1.(a)**. However, municipal privilege license taxes which are levied and collected by the application of a flat percentage rate of gross sales, or gross receipts from sales, and which are passed on directly by the licensee-seller to the purchaser-consumer shall be excluded from gross sales, or gross receipts, as the case may be, in the computation of the sales tax levied by Alabama, in accordance with **§ 40-23-3. Alabama State Sales Tax** - Also, the Applicant acknowledges that there is levied, in addition to the nine percent (9%) medical cannabis sales tax described above, a tax at an amount equal to four percent (4%) of the gross proceeds of sales of the business, pursuant to **§ 40-23-2.(1)**. The Alabama state sales tax imposed shall be in addition to all other licenses and taxes levied by law as a condition precedent to engaging in any business, pursuant to **§ 40-23-28. Local Sales Tax** - Additionally, the Applicant will pay the following

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License Type: Integrated Facility

local taxes (county and city) for each of its licensed facilities: (1) **Luverne** (Integrated Facility) – county and city sales tax rate of 3.5% and 2.5%, respectively; (2) **Montgomery** (Dispensary) - county and city sales tax rate of 2.5% and 3.5%, respectively; (3) **Birmingham** (Dispensary) - county and city sales tax rate of 1% and 4%, respectively; (4) **Tuscaloosa** (Dispensary) - county and city sales tax rate of 3% and 3%; (5) **Decatur** (Dispensary) - county and city sales tax rate of 1% and 4%, respectively; (6) **Dothan** (Dispensary) – county and city sales tax rate of 1% and 4%.

Collection of Sales Tax - The Applicant will add to the sales price and collect from the purchaser on all sales upon the gross receipts or gross proceeds a sales tax at the rate described above and in accordance with **§ 40-23-26.(a)**. In accordance with **Rule 583-x-8-.03-8.a.**, the Applicant's certified dispenser (or another dispensary employee acting under the supervision of the certified dispenser) will allocate the appropriate sum for satisfaction of taxes as may be levied against the sale. The Applicant will not refund or offer to refund all, or any part of the amount collected, or to absorb or advertise directly or indirectly the absorption or refund of the amount required to be added to the sales price and collected from the purchaser, or any portion of such amount, pursuant to **§ 40-23-26.(b)**. The Applicant acknowledges that all taxes paid in pursuance to § 40-23-2 or any other statute enacted in this connection shall conclusively be presumed to be a direct tax on the retail consumer, pre-collected for the purpose of convenience and facility only, pursuant to **§ 40-23-26.(c)**.

Remitting and Reporting Sales Tax - The Applicant will pay the sales tax in monthly installments on or before the 20th day of the month next succeeding the month in which the tax accrues, unless otherwise provided, in accordance with **§ 40-23-7.(a)**. Similarly, the Applicant will report to the Department of Revenue (DOR), on or before the 20th day of each month, on a form prescribed by the DOR, a true and correct statement showing such information as the DOR may require and will pay to the DOR the amount of taxes shown to be due, pursuant to **§ 40-23-7.(b)**. The Applicant will make estimated payments to the DOR on or before the 20th day of the month in which the liability occurs in the amounts computed, in accordance with **§ 40-23-7.(c)**. If the Applicant has any cash and credit sales, the Applicant

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will report such sales in compliance with **§ 40-23-8**.

10.3 Privilege Tax

The Applicant acknowledges that commencing January 1, there is levied an annual privilege tax on every person doing business under the Act in Alabama, pursuant to **§ 20-2A-80.(b)(1)** and **§ 40-14A-22.(a)**. The tax shall accrue as of January 1 of every taxable year, or in the case of a taxpayer licensed under the Act, during the year, or doing business in this state for the first time, as of the date the taxpayer is licensed to do business under the Act. The tax shall be levied upon the Applicant's net worth in Alabama for the taxable year. **Net Worth Calculations** - The Applicant's net worth in Alabama will be calculated under Section 40-14A-23, in the same manner as prescribed for apportioning income during the determination period for purposes of the income tax levied by Chapter 18 of Title 40, or the manner in which the income would be apportioned if the taxpayer were subject to the income tax, pursuant to **§ 20-2A-80.(b)(1)** and **§ 40-14A-24.(a)**. The Applicant will determine its net worth in accordance with principles used in preparing the taxpayer's financial statements reported to its owners, in accordance with **§40-14A-2.(a)**. Since the Applicant is a limited liability company (LLC), net worth will be an amount equal to the sum, but not less than zero, of the capital accounts of the owners of the limited liability company as of the first day of the taxable year of the entity and as further adjusted as described below, pursuant to **§40-14A-23.(b)**. In accordance with **§40-14A-23.(e)**, factoring in additions to the Applicant's net worth, all additions will only include positive amounts and if there's a related-party debt, then it will be handled under the conditions described in **§40-14A-23.(e)(2)**. The Applicant will add to the net worth, as determined above, compensation and distributions paid or accrued in certain situations, as prescribed for limited liability entities in **§40-14A-23.(f)(3)**. From the sum of the items and additions to net worth determined above, the Applicant will subtract the items described in **§40-14A-23.(g)(1 -5)**, as applicable. Similarly, the Applicant will deduct from the amount of net worth in Alabama the items outlined in **§ 40-14A-24.(b)**, as applicable. Specifically, since the Applicant is an LLC, the Applicant will deduct from the amount of net worth in Alabama an amount equal to 30 percent of its taxable income, in accordance with **§ 40-14A-24.(b)(9)**.

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Privilege Tax Rate Calculations - The amount of tax payable by the Applicant will be computed in the same manner and at the same rate of tax as prescribed in § 40-14A-22, for purposes of determining the annual privilege tax levied by Chapter 14A of Title 40, in accordance with **§ 20-2A-80.(b)(2)**. More specifically, the rate of tax will be based on the Applicant's taxable income at the rates set forth in **§ 40-14A-22.(b)**, with the privilege tax levied set at a minimum of \$100 and a maximum of \$15,000, in accordance with **§ 40-14A-22.(c)&(d)**.

Reporting and Remittance- The Applicant will only report the annual medical cannabis privilege tax on forms and in the manner as prescribed by rule by the DOR. The Applicant will not report any tax on any other form than the ones provided by the DOR and understands that by not using their form, it will not relieve the Applicant from liability for any tax, penalty, or interest otherwise due. The tax due, as reported, shall constitute an admitted liability for that amount. The Applicant understands that the DOR may compute and assess additional tax, penalty, and interest against a taxpayer as provided in the Act, pursuant to **§ 20-2A-80.(b)(5)**. More specifically, the Applicant will file an Alabama Business Privilege Tax Return and Annual Report and pay all taxes by the due date of the corresponding federal income tax returns as provided by federal law, which shall include the public record disclosures required by Section 10-2B-16.22, with the DOR for every taxable year and for which it is subject to the tax levied by §40-14A-22, in accordance with **§40-14A-25.(a & b)**. In other words, the Applicant will pay the Alabama business privilege tax at the same time the return is due and will remit the tax levied by §40-14A-22 to the department at Montgomery, Alabama, for deposit to the State Treasurer of Alabama, pursuant to **§40-14A-26**. The Applicant understands that the DOR may grant a reasonable extension of time for filing returns under rules adopted by the DOR (no more than six months), in accordance with **§ 20-2A-80.(b)(4)**. In the case of the Applicant's initial return, the annual return shall be due no later than two and one-half months after the Applicant is licensed to do business, or commences business, in Alabama, pursuant to **§ 20-2A-80.(b)(3)**. The Applicant has already filed with the department an initial report setting out its name, address, and the name and address of its agent for service of process in Alabama and a return, as evidenced by its Certificate of Compliance received from the DOR, pursuant to **§40-14A-29.(a)**.

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10.4 Income Taxes

Alabama Corporate Income Tax - The Applicant will also pay the Alabama corporate income tax, which will be computed at a flat rate of six and one-half percent (6.5%) of Alabama taxable income. Since the Applicant's assets will likely exceed \$5 million or more at the end of the taxable year, the Applicant will e-file all Alabama Corporate Income Tax Returns, for that tax year and all subsequent tax years, as required. The Applicant will remit the Alabama corporate income tax to the DOR within one month following the due date of the corresponding federal income tax return. **Federal Corporate Income Tax** - The Applicant will calculate at a Federal Corporate Income Tax Rate of twenty-one percent (21%) multiplied by Gross Revenue of all sales, in compliance with **IRS Tax Code 280E**. The Applicant will file an annual Corporate Income Tax Return and pay corporate income taxes by the 15th day of the fourth month following the close of its tax year.

10.5 Recordkeeping for taxes

The Applicant will keep and preserve suitable records of the gross sales, gross proceeds of sales, and gross receipts or gross receipts of sales of such business and such other books or accounts as may be necessary to determine the amount of tax for which the Applicant is liable; including all invoices of goods, wares, and merchandise purchased, for resale or otherwise, and all such books, invoices, and other records shall be open for examination by the DOR or any duly authorized agent, pursuant to **§ 40-23-9**.

10.6 Conclusion

The Applicant can certify that it or any of its owners has never 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, in accordance with **Rule 538-x-3-.05-3.f.** and **§20-2A-55.(a)(6)**. As demonstrated above, the Applicant's *Tax Plan*, overseen by the CFO/CPA, will ensure the Applicant remains compliant and exceeds the requirements for tax compliance in Alabama.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 11 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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11.1 Summary

The Applicant has successfully filed for and received all of its formation documents. Attached are certified copies of the Applicant's business formation documents, including:

- Certificate of Formation
- Limited Liability Company Agreement
- Employer Identification Number
- Certificate of Good Standing
- Certificate of Compliance
- Trade Name Registration
- Sale Tax License
- County and Municipal License

Certificate of Formation – Since the Applicant is an Alabama limited liability company, the Applicant has filed a Certificate of Formation to legally create the entity, Verano Alabama LLC. This document serves as the official record of the company with the Alabama Secretary of State.

Certificate of Good Standing – The Applicant's Certificate of Good Standing indicates that Verano Alabama, LLC has filed all reports and paid the necessary fees with the Alabama Secretary of State's office. Thus, this document serves as proof that Verano Alabama, LLC is prepared to and authorized to conduct business in Alabama.

Certificate of Compliance – The Applicant’s Certificate of Compliance was issued by the Alabama Department of Revenue, and it indicates that the Applicant 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 December 07, 2022.

Trade Name Registration – The Applicant plans to operate its dispensaries using the trade name, Zen Leaf. As such, the Applicant has registered the trade name Zen Leaf with the Alabama Secretary of State, as evidenced by the attached Trade Name Registration document.

Sale Tax License - The sales tax license serves as the agreement with the Alabama state tax agency to collect and remit sales tax on items sold by the Applicant.

11.2 Certificate of Formation

STATE OF ALABAMA

DOMESTIC LIMITED LIABILITY COMPANY (LLC)
CERTIFICATE OF FORMATION

PURPOSE: In order to form a Limited Liability Company (LLC) under Section 10A-5A-2.01 of the *Code of Alabama 1975*, this Certificate of Formation and the appropriate filing fees must be filed with the Office of the Secretary of State. The information required in this form is required by Title 10A.

- 1. The name of the limited liability company (must contain the words "Limited Liability Company" or the abbreviation "L.L.C." or "LLC," and comply with *Code of Alabama*, Section 10A-1-5.06. You may use Professional or Series before Limited Liability Company or LLC (or PLLC or SLLC) if they apply:

Verano Alabama, LLC

- 2. A copy of the Name Reservation Certificate from the Office of the Secretary of State must be attached.

- 3. The name of the registered agent (only one agent): Universal Registered Agents, Inc.

Street (no PO Boxes) address of registered office (must be located in Alabama):

641 South Lawrence Street Montgomery, AL 36104

*COUNTY of above address: MONTGOMERY

Mailing address in Alabama of registered office (if different from street address):

- 4. The undersigned certify that there is at least one member of the limited liability company.

(For SOS Office Use Only)

Alabama
Sec. Of State
001-023-777 DLL
Date 06/07/2022
Time 12:24:00
File \$100.00
County \$100.00

Total \$200.00

DOMESTIC LIMITED LIABILITY COMPANY (LLC) CERTIFICATE OF FORMATION

5. Check **only** if the type applies to the Limited Liability Company being formed:

Series LLC complying with Title 10A, Chapter 5A, Article 11

Professional LLC complying with Title 10A, Chapter 5A, Article 8

Non-Profit LLC complying with Section 10A-5A-1.04(c)

6. The filing of the limited liability company is effective immediately on the date received by the office of the Secretary of State, Business Services Division or at the delayed filing date (cannot be prior to the filing date) specified in this filing complying with Section 10A-1-4.12

The undersigned specify 6 / 7 / 2022 as the effective date (must be on or after the date filed in the office of the Secretary of State, but no later than the 90th day after the date this instrument was signed) and the time of filing to be 0 : 24 AM or PM. (cannot be noon or midnight – 12:00)

Attached are any other matters the members determine to include herein (if this item is checked there must be attachments with the filing).

6 / 7 / 2022
Date (MM/DD/YYYY)

George Archos
Signature as required by 10A-5A-2.04

Organizer
Typed title (organizer or attorney-in-fact)

*County of Registered Agent is requested in order to determine distribution of County filing fees.

Additional Details

Organizers	Street Address	Mailing Address
George Archos	415 N. Dearborn St., 4th Floor Chicago, IL 60654	415 N. Dearborn St., 4th Floor Chicago, IL 60654

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:

Verano Alabama, LLC

This name reservation is for the exclusive use of George Archos, 415 N. Dearborn St., 4th Floor, Chicago, IL 60654 for a period of one year beginning June 07, 2022 and expiring June 07, 2023



RES027478

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.


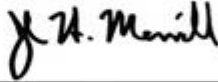
June 07, 2022

Date

John H. Merrill

Secretary of State

11.5 Certificate of Good Standing

John H. Merrill Secretary of State	P.O. Box 5616 Montgomery, AL 36103-5616
<h1>STATE OF ALABAMA</h1>	
I, John H. Merrill, Secretary of State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that	
the entity records on file in this office disclose that Verano Alabama, LLC was formed in Alabama, Alabama on June 7, 2022. The Alabama Entity Identification number for this entity is 001-023777. I further certify that the records do not disclose that said entity has been dissolved, cancelled or terminated.	
	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.
20221012000009320	10/12/2022
Date	
John H. Merrill	Secretary of State

11.6 Certificate of Compliance



***State of Alabama
Department of Revenue***

Certificate of Compliance

Verano Alabama 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 December 22, 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 December 22, 2022.*

A handwritten signature in black ink, appearing to read 'Wendell J. [unclear]', is written over a horizontal line.

Disclosure Officer

**Phone: 334-242-1189
Fax: 334-242-1030**

11.7 Trade Name Registration

<p>JOHN H. MERRILL SECRETARY OF STATE</p>	<p>ALABAMA STATE CAPITOL MONTGOMERY, AL 36130</p>
<h1>STATE OF ALABAMA</h1>	
<p>I, John H. Merrill, Secretary of State of the State of Alabama, having custody of the Great and Principal Seal of said State, do hereby certify that</p>	
<p>Verano Alabama, LLC, a Delaware limited liability company, 361 S. Lawrence St. Montgomery, AL 36104 has filed in this office, the necessary papers and information pursuant to Section 8-12-6 et seq, <u>Code of Alabama, 1975</u>, as last amended, to be entitled to the Legal Registration in Alabama, for a term of Five Years beginning November 16, 2022 and ending November 16, 2027, of the following Trade Name, First Used Anywhere March 1, 2017, and First Used in Alabama November 16, 2022 in Classification 25 for Miscellaneous under Registration Number 126-869:</p>	
<h1>ZENLEAF</h1>	
	<p>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.</p>
<p>Date</p>	<p>November 17, 2022</p>
<p>John H. Merrill</p>	<p> Secretary of State</p>

11.8 Sales Tax License



2023
SALES TAX LICENSE
State of Alabama
Alabama Department of Revenue

ISSUED TO:

VERANO ALABAMA LLC
641 S LAWRENCE ST
MONTGOMERY, AL 36104-5809

TO ENGAGE IN BUSINESS FOR WHICH TAX IS IMPOSED BY SECTIONS 40-23-1/39 CODE OF ALABAMA 1975,
AS AMENDED. SALES TAX LAW

NON-TRANSFERABLE
THIS ACCOUNT ISSUED TO PERSON OR BUSINESS WHOSE NAME APPEARS ABOVE IS NOT TRANSFERABLE.
THE LICENSEE MAY PURCHASE ITEMS TAX EXEMPT FOR THE PURPOSE OF RESALE AT RETAIL IN THE REGULAR COURSE OF
BUSINESS.

STATE OF ALABAMA
DEPARTMENT OF REVENUE

Janet N. Starkopoulos
Deputy Commissioner

ALABAMA DEPARTMENT OF REVENUE
P.O. BOX 327900
MONTGOMERY, AL 36132-7900
SLS

Provider Code 4400

VERANO ALABAMA LLC
415 N DEARBORN ST FL 4
CHICAGO, IL 60654-4696

11.9 County and Municipal Licenses

11.9.1 Houston County

STATE OF ALABAMA

HOUSTON COUNTY
 ISSUED TO:

LICENSE YEAR
2022-2023

VERANO ALABAMA LLC

415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654

BUSINESS LOCATION:

DATE ISSUED		
12	27	2022
MO.	DAY	YR.

LICENSE TYPE	
STORE LICENSE	X
CHAIN STORE LICENSE	
OCCUPATIONAL LICENSE	

DOTHAN, AL 36301

EXPIRES
 September 30, 2023
 RENEW IN OCTOBER

RL:

SECTION	BUSINESS TYPE	License Amount	FEE	PENALTY	CITATION	INTEREST	TOTAL
315A	STORE LICENSE	1.00	1.00	0.00	0.00	0.00	2.00

TRANSFER OF LICENSE Evidence having been adduced before me that a bona fide sale of the business licensed by this certificate has been made by licensee, this license is transferred to said purchaser.						TOTAL	7.00
Name of Purchaser: <u>Vernon Barnett</u> Commissioner of Revenue						MAIL FEE	1.00
Issuing Authority: <u>Patrick H. Davenport</u> Issuing Authority						TOTAL WITH MAIL FEE	8.00

VERANO ALABAMA LLC

415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654

11.9.2 Montgomery County

<h1>STATE OF ALABAMA</h1>																		
MONTGOMERY COUNTY																		
ISSUED TO:																		
VERANO ALABAMA LLC																		
<table border="1" style="width: 100%;"> <tr><td style="text-align: center;">LICENSE YEAR</td></tr> <tr><td style="text-align: center; font-size: 24pt;">2023</td></tr> </table>	LICENSE YEAR	2023	415 N DEARBORN ST 4TH FL CHICAGO, IL 60654			<table border="1" style="width: 100%;"> <tr><td colspan="3" style="text-align: center;">DATE ISSUED</td></tr> <tr><td style="text-align: center;">12</td><td style="text-align: center;">21</td><td style="text-align: center;">2022</td></tr> <tr><td style="text-align: center;">MO.</td><td style="text-align: center;">DAY</td><td style="text-align: center;">YR.</td></tr> </table>				DATE ISSUED			12	21	2022	MO.	DAY	YR.
LICENSE YEAR																		
2023																		
DATE ISSUED																		
12	21	2022																
MO.	DAY	YR.																
<table border="1" style="width: 100%;"> <tr><td colspan="2" style="text-align: center;">LICENSE TYPE</td></tr> <tr><td>STORE LICENSE</td><td style="text-align: center;">X</td></tr> <tr><td>CHAIN STORE LICENSE</td><td></td></tr> <tr><td>OCCUPATIONAL LICENSE</td><td></td></tr> </table>		LICENSE TYPE		STORE LICENSE	X	CHAIN STORE LICENSE		OCCUPATIONAL LICENSE		BUSINESS LOCATION: MONTGOMERY, AL 36110			EXPIRES 9/30/2023 RENEW IN OCTOBER					
LICENSE TYPE																		
STORE LICENSE	X																	
CHAIN STORE LICENSE																		
OCCUPATIONAL LICENSE																		
RL:																		
SECTION	BUSINESS TYPE	License Amount	FEE	PENALTY	CITATION	INTEREST	TOTAL											
315A	STORE LICENSE	1.00	1.00	0.00	0.00	0.00	2.00											
TRANSFER OF LICENSE Evidence having been adduced before me that a bona fide sale of the business licensed by this certificate has been made by licensee, this license is transferred to said purchaser.						TOTAL	2.00											
Name of Purchaser _____						MAIL FEE	0.00											
Issuing Authority _____						TOTAL WITH MAIL FEE	2.00											
_____ Kathleen D. Baxter State Comptroller																		
_____ Vernon Barnett Commissioner of Revenue																		
_____ J C LOVE, III Issuing Authority																		

VERANO ALABAMA LLC

415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654

CASH :	\$0.00
CHECK :	\$2.00 4583
CC :	\$0.00
CHANGE :	\$0.00

TOTAL :	\$2.00

11.9.3 City of Decatur

CERTIFICATE

STATE OF ALABAMA)
COUNTIES OF MORGAN AND LIMESTONE) CITY OF DECATUR

I, Stephanie Simon, City Clerk of the City of Decatur, Alabama, hereby certify that the attached is a true and correct copy adopted by the City Council of the City of Decatur, Alabama at a regular meeting held thereof on the 27th day of December, 2022 as the same appears in the records on file in the Office of the City Clerk.

WITNESS my signature as City Clerk under the seal of the City of Decatur, Alabama, this 27th day of December, 2022.




Stephanie Simon
City Clerk



A Grand City on a CHARMING SCALE

Planning Department

December 22, 2022

Verano Alabama, LLC
C/O Trevor Seyller
415 N Dearborn St 4th Floor
Chicago, IL 60654

Re: Zoning Verification Request

To Whom It May Concern:

Zoning Verification Letters provide information about and verify the current zoning of a particular piece of property and the types of uses that are allowed in that zoning district.

This location is considered approved by the Planning Department.

Regards,

Lee Terry
Planner III
Planning Department

Planning Department – City of Decatur
308 Cain Street, NE • Post Office Box 488 • Decatur, AL 35602-0488
Phone (256) 341-4720 • Fax (256) 341-4727 • www.DecaturAlabamaUSA.com

11.9.4 City of Luverne

ED BEASLEY
MAYOR

CITY OF LUVERNE
The Friendliest City in the South

MARGIE GOMILLION
CITY CLERK

P.O. Box 249
LUVERNE, ALABAMA 36049
Telephone (334) 335-3741
FAX (334) 335-2206

December 20, 2022

Verano Alabama, LLC
415 N Dearborn St., 4th Floor
Chicago, IL 60654

Dear Sirs:

This is to confirm that upon Verano Alabama, LLC being awarded a license by the Alabama Medical Cannabis Commission, the City of Luverne will issue a business license for their production facility to be located in the City of Luverne. The location they have chosen is in compliance with the City of Luverne's zoning ordinance and is zoned for their intended business.

We are looking forward to working with YOU in this endeavor. Should you require any additional information, please let me know.

Sincerely,



Ed Beasley
Mayor

11.9.5 City of Birmingham

CITY OF BIRMINGHAM

Department Of Planning, Engineering & Permits
710 North 20th Street
City Hall | Room 210
Birmingham, Alabama 35203



PUTTING PEOPLE FIRST

RANDALL L. WOODFIN
MAYOR

KATRINA THOMAS
DIRECTOR

13 December 2022

Verano Alabama, LLC
415 N Dearborn St, 4th floor
Chicago, IL 60657

To Whom It May Concern:

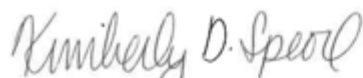
A Medical Cannabis Dispensary is permitted with conditions in this zoning district. The conditions include:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.

The City of Birmingham's Zoning Ordinance is available online at www.birminghamal.gov

This letter is only to confirm zoning information for the location provided in your request but does not verify that the location meets the spacing required for a dispensary. This letter does not approve the use of the medical cannabis dispensary at the above-mentioned address. All medical cannabis related uses in the City of Birmingham must be approved by the Alabama Medical Cannabis Commission and shall comply with the Rules and Regulations of the Alabama Medical Cannabis Commission.

Sincerely,



Kimberly D. Speer
Zoning Administrator

The City of Birmingham's Zoning Ordinance is available online at www.birminghamal.gov

11.9.6 City of Tuscaloosa



December 19th, 2022

Trevor Seyller
Verano Alabama, LLC
415 N Dearborn St.
4th Floor
Chicago, IL 60654

To Whom It May Concern:

This letter is to verify the above referenced property is located within the corporate limits of the City of Tuscaloosa and is currently zoned MX-3.

Section 24-304 of the Tuscaloosa City Code outlines permitted uses for property zoned MX-3. Retail sales or service is listed as a permitted use for property zoned MX-3. Medical cannabis dispensing sites are considered retail sales or service.

Any and all state or federal guidelines and regulations related to medical cannabis dispensing will have to be followed, and the City of Tuscaloosa does not have any additional zoning restrictions for this use at this time.

Should you have any questions, please do not hesitate to contact the Planning Division of the Office of Urban Development at 205-248-5100.

Sincerely,

A handwritten signature in cursive script that reads 'Jonathan Bowen'.

Jonathan Bowen
Planner



PLANNING

2201 University Blvd. • Tuscaloosa, AL 35401 • Phone 205-248-5110 • Fax 205-349-0136 • City Hall 205-248-5311

TUSCALOOSA.COM    @TuscaloosaCity

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 12 – Business License and Authorization of Local Authorities.

Verification

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

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

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Summary

The Applicant has secured and gained approval for all of its facilities (one cultivation/processing facility and six dispensing sites) located at:

- Cultivation/Processing Facility - Luverne, AL 36049
- Dispensing Site #1 - Montgomery, AL 36110
- Dispensing Site #2 - , Birmingham, AL 35212
- Dispensing Site #3 - , Dothan, AL 36301
- Dispensing Site #4 - Tuscaloosa, AL 35404
- Dispensing Site #5 - , Decatur, AL 35603

As such, what follows are certified copies of the Applicant’s business license for each site (Section 8.1). Also, the Applicant provides resolution or ordinances by the local jurisdiction (County or Municipality, as appropriate) approving the Applicant’s business presence in each local jurisdiction (Section 8.2). As an added layer of evidence of local authorization and support, the Applicant provides evidence of community support (Section 8.3).

12.1 Certified copies of the Applicant’s business license

12.1.1 - Luverne, AL 36049

The City of Luverne will serve as the cultivation and processing site. The city has welcomed the Applicant with open arms.

ED BEASLEY
MAYOR

CITY OF LUVERNE
The Friendliest City in the South

MARGIE GOMILLION
CITY CLERK

P.O. Box 249
LUVERNE, ALABAMA, 36049
Telephone (334) 335-3741
FAX (334) 335-2206

December 20, 2022

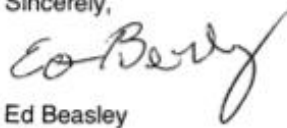
Verano Alabama, LLC
415 N Dearborn St., 4th Floor
Chicago, IL 60654

Dear Sirs:

This is to confirm that upon Verano Alabama, LLC being awarded a license by the Alabama Medical Cannabis Commission, the City of Luverne will issue a business license for their production facility to be located in the City of Luverne. The location they have chosen is in compliance with the City of Luverne's zoning ordinance and is zoned for their intended business.

We are looking forward to working with YOU in this endeavor. Should you require any additional information, please let me know.

Sincerely,



Ed Beasley
Mayor

ED BEASLEY
MAYOR

CITY OF LUVERNE
The Friendliest City in the South

MARGIE GOMILLION
CITY CLERK

P.O. Box 249
LUVERNE, ALABAMA 36049
Telephone (334) 335-3741
FAX (334) 335-2206

November 28, 2022

Alabama Medical Cannabis Commission
P. O. Box 3095
Montgomery, AL 36130

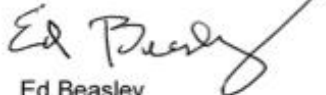
RE: Verano Alabama, LLC

Dear Sirs:

I am writing to advise that the City of Luverne is pleased to partner with Verano Alabama, LLC, a leading medical cannabis cultivator, to develop a medical cannabis production facility in the City of Luverne. Verano has a proven track record of successfully operating and maintaining compliance in one of the most regulated medical markets in the country. Verano has committed to supporting the community in several capacities, including support for the Crenshaw Community Hospital which is a major part of our community. We are very excited because we believe this project will result in a significant stimulus to the economy in the City of Luverne and in Crenshaw County.

The City of Luverne whole-heartedly supports Verano in their pursuit of a Medical Cannabis Integrated Facility license and believes Luverne is a strategic location for such a facility. We would strongly urge the Commission to award Verano a Medical Cannabis Integrated Facility license due to their demonstrated compliance in operating these types of facilities and the commitment to the communities where they are located. The City of Luverne stands ready to support Verano in the development of this project and looks forward to a long partnership that will benefit everyone concerned. Should you require any additional information, please feel free to contact me.

Sincerely,



Ed Beasley
Mayor

12.1.2 - Montgomery, AL 36110

The City of Montgomery will serve as an Applicant dispensing site but won't issue a municipal business license to any dispensary businesses until the Applicant has received state cannabis licensure. The facility is located at **Montgomery, AL 36110** which falls within the approved zone for cannabis retail locations.



Steven L. Reed
Mayor

City Council Members
Charles W. Jarright - President
Cornelius "CC" Calhoun - Pres. Pro Tem
Ed Grimes
Brantley W. Lyons
Marche Johnson
Audrey Graham
Oronde S. Mitchell
Clay Melvin
Glen O. Pratt Jr.

November 2, 2022

Trevor Seyller
Verano Alabama, LLC
415 N. Dearborn St., 4th Floor
Chicago, IL 60654

RE:

Dear Sir or Madam:

This is to advise you that the properties located at _____ is in a B-5 (Commercial) Zoning District, which will permit a medical cannabis dispensary.

The City is providing this information solely as a courtesy and the person requesting such information should independently confirm the information contained, herein. The City assumes no liability or responsibility for any misstatements or inaccuracies contained. If we can be of any further assistance, please do not hesitate to contact me at (334)625-2722.

Sincerely,

Thomas M. Tyson, Jr.
Land Use Control Administrator

/tri

The Applicant has obtained a state/county business license for the Montgomery dispensing site, provided below.

STATE OF ALABAMA

MONTGOMERY COUNTY

ISSUED TO:

VERANO ALABAMA LLC

LICENSE YEAR
2023

415 N DEARBORN ST
 4TH FL
 CHICAGO, IL 60654

DATE ISSUED		
12	21	2022
MO.	DAY	YR.

LICENSE TYPE	
STORE LICENSE	X
CHAIN STORE LICENSE	
OCCUPATIONAL LICENSE	

BUSINESS LOCATION:

MONTGOMERY, AL 36110

RL:

EXPIRES
 9/30/2023
 RENEW IN OCTOBER

SECTION	BUSINESS TYPE	License Amount	FEE	PENALTY	CITATION	INTEREST	TOTAL	
315A	STORE LICENSE	1.00	1.00	0.00	0.00	0.00	2.00	
<p style="margin: 0;">TRANSFER OF LICENSE Evidence having been adduced before me that a bona fide sale of the business licensed by this certificate has been made by licensee, this license is transferred to said purchaser.</p>							TOTAL	2.00
<p style="margin: 0; text-align: center;">Kathleen D. Baxter State Comptroller</p>							MAIL FEE	0.00
<p style="margin: 0; text-align: center;">Name of Purchaser _____ Commissioner of Revenue</p>							TOTAL WITH MAIL FEE	2.00
<p style="margin: 0; text-align: center;">Issuing Authority _____ J C LOVE, III Issuing Authority</p>								

VERANO ALABAMA LLC

 415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654

PAYMENT INFO (2376520)

 CASH : \$0.00
 CHECK : \$2.00 4583
 CC : \$0.00
 CHANGE : \$0.00

TOTAL : \$2.00

12.1.3 - Birmingham, AL 35212

The City of Birmingham will serve as an Applicant dispensing site but won't issue a municipal business license to any dispensary business until the Applicant has received state cannabis licensure. The facility is located at

Birmingham, AL 35212 which falls within the approved zone for cannabis retail locations.

CITY OF BIRMINGHAM
Department Of Planning, Engineering & Permits
710 North 20th Street
City Hall | Room 210
Birmingham, Alabama 35203



PUTTING PEOPLE FIRST

RANDALL L. WOODFIN
MAYOR

KATRINA THOMAS
DIRECTOR

13 December 2022

Verano Alabama, LLC
415 N Dearborn St, 4th floor
Chicago, IL 60657

To Whom It May Concern:

The property located at _____ is zoned CB-2, Contingency General Business District. Properties to the north, south, and west are also zoned CR-2. Properties to the east are zoned R-3 (Single Family District).

According to the City of Birmingham's Geographic Information System (GIS), the property is not located in a regulated floodplain or Commercial Revitalization/Historic District.

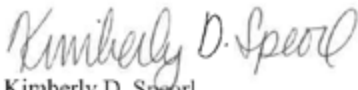
A Medical Cannabis Dispensary is permitted with conditions in this zoning district. The conditions include:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.

The City of Birmingham's Zoning Ordinance is available online at www.birminghamal.gov

This letter is only to confirm zoning information for the location provided in your request but does not verify that the location meets the spacing required for a dispensary. This letter does not approve the use of the medical cannabis dispensary at the above-mentioned address. All medical cannabis related uses in the City of Birmingham must be approved by the Alabama Medical Cannabis Commission and shall comply with the Rules and Regulations of the Alabama Medical Cannabis Commission.

Sincerely,



Kimberly D. Speer
Zoning Administrator

The City of Birmingham's Zoning Ordinance is available online at www.birminghamal.gov

12.1.4 - , Dothan, AL 36301

The Applicant has obtained a state/county business license for the facility located at
, Dothan, AL 36301 which falls within the approved zone for cannabis retail locations.

STATE OF ALABAMA

HOUSTON COUNTY
 ISSUED TO:

LICENSE YEAR
2022-2023

VERANO ALABAMA LLC

DATE ISSUED		
12	27	2022
MO.	DAY	YR.

415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654 BUSINESS LOCATION:

LICENSE TYPE	
STORE LICENSE	<input checked="" type="checkbox"/>
CHAIN STORE LICENSE	<input type="checkbox"/>
OCCUPATIONAL LICENSE	<input type="checkbox"/>

EXPIRES
 September 30, 2023
 RENEW IN OCTOBER

SECTION	BUSINESS TYPE	License Amount	FEE	PENALTY	CITATION	INTEREST	TOTAL
315A	STORE LICENSE	1.00	1.00	0.00	0.00	0.00	2.00

TRANSFER OF LICENSE Evidence having been adduced before me that a bona fide sale of the business licensed by this certificate has been made by licensee, this license is transferred to said purchaser.		_____ Kathleen D. Baxter State Comptroller		_____ Vernon Barnett Commissioner of Revenue		_____ Patrick H. Davenport Issuing Authority	
Name of Purchaser						TOTAL 7.00	
Issuing Authority						MAIL FEE 1.00	
						TOTAL WITH MAIL FEE 8.00	

VERANO ALABAMA LLC
 415 N DEARBORN ST 4TH FL
 CHICAGO, IL 60654



CITY OF DOTHAN

Department of Planning and Development

P. O. BOX 2128 · DOTHAN, ALABAMA 36302 · 334-615-4410 (o) · 334-615-4419 (f)
www.dothan.org

Todd L. McDonald, AICP – Director

December 14, 2022

Trevor Seyller
Varano Alabama LLC
415 N Dearborn St.
4th Floor
Chicago, IL 60654

RE:

To Whom It May Concern:

The Planning and Development Department is pleased to report that the subject property is zoned B-2 (Highway Commercial) according to the Official Zoning Map of the City of Dothan, Alabama. Under the B-2 zoning district, medical cannabis dispensaries are permitted by-right.

Preliminary review of the location referenced above indicates that there are no schools, day cares, or childcare facilities within 1,000 feet of this property. However, this is a requirement of state law and is not part of the city ordinance. It is your responsibility to verify that none of these uses exists with 1000 ft. of this property.

- The Property is not in a special, restrictive, or overlay district.
- The Property is not part of a PUD.
- Adjacent properties are zoned B-2.

Should you have any questions, please feel free to contact me. My direct telephone number is 334-615-4412 and my e-mail address is kvann@dothan.org

Sincerely,

~~Kimberly Vann~~
Kimberly Vann
Planning Assistant

cc: File

12.1.5 - Tuscaloosa, AL 35404

The City of Tuscaloosa will serve as an Applicant dispensing site but won't issue a municipal business license to any dispensary business until the Applicant has received state cannabis licensure. The facility is located at _____, **Tuscaloosa, AL 35404** which falls within the approved zone for cannabis retail locations.



December 19th, 2022

Trevor Seyller
Verano Alabama, LLC
415 N Dearborn St.
4th Floor
Chicago, IL 60654

RE: Tuscaloosa, AL 35404

To Whom It May Concern:

This letter is to verify the above referenced property is located within the corporate limits of the City of Tuscaloosa and is currently zoned MX-3.

Section 24-304 of the Tuscaloosa City Code outlines permitted uses for property zoned MX-3. Retail sales or service is listed as a permitted use for property zoned MX-3. Medical cannabis dispensing sites are considered retail sales or service.

Any and all state or federal guidelines and regulations related to medical cannabis dispensing will have to be followed, and the City of Tuscaloosa does not have any additional zoning restrictions for this use at this time.

Should you have any questions, please do not hesitate to contact the Planning Division of the Office of Urban Development at 205-248-5100.

Sincerely,

Jonathan Bowen
Planner



PLANNING

2201 University Blvd. • Tuscaloosa, AL 35401 • Phone 205-248-5100 • Fax 205-349-0136 • City Hall 205-248-5311

TUSCALOOSA.COM @TuscaloosaCity

12.1.6 - Decatur, AL 35603

CERTIFICATE

STATE OF ALABAMA)
) CITY OF DECATUR
COUNTIES OF MORGAN AND LIMESTONE)

I, Stephanie Simon, City Clerk of the City of Decatur, Alabama, hereby certify that the attached is a true and correct copy of _____ adopted by the City Council of the City of Decatur, Alabama at a regular meeting held thereof on the 27th day of December, 2022 as the same appears in the records on file in the Office of the City Clerk.

WITNESS my signature as City Clerk under the seal of the City of Decatur, Alabama, this 27th day of December, 2022.



Stephanie Simon
Stephanie Simon
City Clerk

12.2 Resolution(s) or ordinance(s) by local jurisdiction(s) approving the Applicant's business

12.2.1 - Luverne, AL 36049

**ORDINANCE TO AMEND CHAPTER TWENTY-TWO ARTICLE 5 OF THE
ORDINANCES OF THE CITY OF LUVERNE AS FOLLOWS:**

Warehousing and Light Industry District, M-1.

The M-1 district is established to protect and promote a suitable environment for light industrial purposes, including accessibility to major transportation facilities availability of adequate utilities and other public services and availability of large quantities of suitable land. Uses compatible with light industrial development are to be encouraged in so far as they are in accordance with comprehensive development plans of the City.

Uses permitted.

- (a) All light industrial uses which do not cause obnoxious noise, vibrations, smoke, gas, fumes, odor, dust, glare, fire hazard or other objectionable environmental conditions.
- (b) Bus terminals and bus repair shops.
- (c) Truck terminals.
- (d) Laboratories.
- (e) Wholesale businesses.
- (f) Bottling and dairy products processing plants.
- (g) Food products manufacturing.
- (h) New and used automobiles sales.
- (i) Commercial nurseries and greenhouses.
- (j) Automobile service stations, provided that they meet the requirements stated in the B-3 district regulations.
- (k) Restaurants, cafes, grills, drive-in restaurants.
- (l) Animal hospitals
- (m) Storage area excluding junk yards.

(n) Commercial parking lots and garages in accordance with the provisions of Section 4.3.

(o) Radio transmitting towers.

(p) Signs advertising the establishment located on the premises, or the product produced or sold on the premises, as permitted in the B-3 zone.

(q) Medical Cannabis Integrated Facility.

Cannabis is defined as follows:

All parts of any plant of the genus cannabis, whether growing or not, including the seeds, extraction of any kind from any part of the plant, and every compound, derivative, mixture, product, or preparation of the plant; but excluding industrial hemp or hemp regulated under Ala.Code, 1975, § 2-8-11, as now or hereafter amended, and also excluding cannabis that is cultivated, processed, transported, stored, possessed, or used outside the Statewide Seed-to-Sale Tracking System (i.e., illicit cannabis), including but not limited to cannabis that once was included within and/or intended for placement on the Statewide Seed-to-Sale Tracking System (i.e., diverted cannabis).

A Medical Cannabis Integrated Facility, not to include retail dispensing, shall be permitted provided the following conditions are met:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Integrated Facility authorized pursuant to Ala.Code, 1975, § 20-2A-67, as now or hereafter amended, shall operate within the provisions of Ala.Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis Integrated Facilities shall be governed by the Medical Cannabis Act and the AMCC Rules.

Done and approved this 28th day of November, 2022.

12.2.2 -

Montgomery, AL 36110

ORDINANCE NO. 63-2021

AUTHORIZING THE OPERATION OF A MEDICAL CANNABIS DISPENSARY
WITHIN THE CORPORATE LIMITS OF THE CITY OF MONTGOMERY

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 a qualifying medical condition and a valid medical cannabis card; and

WHEREAS, a dispensary may only be operated in a municipality if the municipality has passed an ordinance 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 Montgomery; and

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

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

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MONTGOMERY, ALABAMA, that it authorizes the operation of dispensing sites within the corporate limits of the City of Montgomery subject to any applicable zoning restrictions the City of Montgomery may adopt pursuant to §20-2A-51(c)(3).

ADOPTED this the 7th day of December, 2021.


STEVEN L. REED, MAYOR

ATTEST:


BRENDA GALE BLALOCK, CITY CLERK

63-2021

12.2.3 - Birmingham, AL 35212

Oc04oca28jb.o1

RECOMMENDED BY: THE MAYOR AND
THE PUBLIC SAFETY COMMITTEE

SUBMITTED BY: THE CITY ATTORNEY

ORDINANCE NO. 22-142

AN ORDINANCE TO AUTHORIZE THE OPERATION OF MEDICAL CANNABIS DISPENSARIES WITHIN THE CORPORATE LIMITS OF THE CITY OF BIRMINGHAM, PURSUANT TO ALA. CODE, 1975, § 20-2A-51(c).

WHEREAS, the Darren Wesley “Ato” Hall Compassion Act, codified at Ala. Code, 1975, § 20-2A-1, et seq. (the Act), authorizes the cultivation, processing, and sales of cannabis products for medical use by patients with a qualifying medical condition and a valid medical cannabis card; and

WHEREAS, the Act requires the Alabama Medical Cannabis Commission to adopt rules that ensure safety, security, and integrity of the operation of medical cannabis facilities and protect the health, safety, and security of the public, thus heavily regulating all aspects of the medical cannabis industry, including dispensary operations, (See §§ 20-2A-50 – 20-2A-68, Code of Alabama); and,

WHEREAS, the Alabama Medical Cannabis Commission published its rules adopted pursuant to Ala. Code, 1975, § 20-2A-53 on August 31, 2022, and will accept applications from October 31 through December 30, 2022; and,

WHEREAS, the Commission will deem applications complete and submitted on or about April, 13, 2023, and will open a public comment period on or about April 14, 2023 to accept comments from the public on all pending applications and may set a public hearing, at the Commission’s discretion, before the issuance of licenses on or after July 10, 2023; and,

WHEREAS, the number of licenses for dispensary facilities to be issued by the Commission is limited as follows:

Integrated Facilities – up to 5 licenses; each licensee authorized up to 5 dispensing sites located in separate counties

Dispensary – up to 4 licenses; each licensee authorized up to 3 dispensing sites located in separate counties

WHEREAS, a dispensary, including a dispensary under an Integrated Facility License may only operate in a municipality if the municipality has passed an ordinance authorizing the operation of dispensaries within the municipality’s corporate limits; and

WHEREAS, the health care industry is a highly valued segment of the City of Birmingham’s economy and includes world-renown health care resources, including hospitals, clinics, education, and research facilities and the valued professionals and support staff who care for patients from within the state, the nation, and from abroad; and,

WHEREAS, the operation of a medical cannabis dispensary within the corporate limits of the City of Birmingham will further expand opportunities for the City’s flourishing health care industry and provide new options to care for patients with qualifying medical conditions; and,

WHEREAS, the operation of a medial cannabis dispensary will provide new economic and employment opportunities and new revenue through business licensing and other taxes; and,

WHEREAS, the Council of the City of Birmingham finds that it is in the best interest of the public health, safety, and welfare to authorize the operation of medical cannabis dispensing facilities within the City of Birmingham, subject to the strict regulation and oversight of the Alabama Medical Cannabis Commission.

NOW THEREFORE, BE IT ORDAINED by the Council of the City of Birmingham as follows:

SECTION 1.

- (a) The operation of medical cannabis dispensaries within the corporate limits of the City of Birmingham is authorized, subject to any applicable zoning restrictions the City may adopt pursuant to Ala. Code, 1975, § 20-2A-51(c)(3).
- (b) The operation of any facility, regardless of type, licensed by the Alabama Medical Cannabis Commission within the City of Birmingham shall comply with the Commission’s strict regulation and oversight and shall comply with all laws and ordinances for the operation of a business within the City, including, but not limited to business licensing and other required taxes, and with all applicable ordinances and codes for location, construction, and sanitation of business premises within the City of Birmingham.
- (c) This ordinance shall be interpreted with respect to the Darren Wesley “Ato” Hall Compassion Act, Ala. Code, 1975, § 20-2A-1, et seq. and the rules of the Alabama Medical Cannabis Commission, as either is now or may hereafter be amended.

SECTION 2.

A certified copy of this ordinance shall be submitted within seven days of its adoption to the Alabama Medical Cannabis Commission by the City Clerk, as provided in Ala. Code, 1975, § 20-2A-51(c)(2). The City Clerk and the Director of the Department of Innovation and Economic Opportunity may cooperate to ensure and record the submittal of the ordinance.

SECTION 3. SEVERABILITY. The provisions of this ordinance are severable. If any part of this ordinance is determined by a court of competent jurisdiction to be invalid, unenforceable or unconstitutional, such determination shall not affect any other part of this ordinance.

SECTION 4. EFFECTIVE DATE. This ordinance shall be effective when published as required by law.

Adopted by the Council October 4, 2022 and Approved by the Mayor October 6, 2022



A CERTIFIED COPY
Lee Frazier, City Clerk
Birmingham, AL
Lee Frazier

Submitted by Valerie Abbott, Chair, PLANNING AND ZONING COMMITTEE

BE IT ORDAINED by the Council of the City of Birmingham as follows:

SECTION 1. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 1: General Provisions and Definitions; Article II: Definitions; Section 1: Generally, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Article III. Definitions.

Section 1. Generally.

For the purpose of this Ordinance, certain terms and words are hereby defined. Any word used in this Ordinance not defined in this section will be defined by using "Webster's II New College Dictionary". Words used in the present tense shall include the future; the singular number shall include the plural and plural the singular; the word "building" shall include the word "structure" and the word "shall" is mandatory and not optional.

1. **Abutting.** Any property touching or sharing a common boundary. This term shall not be deemed to include parcels that are across a public street or right-of-way from each other.
2. **Accessory Structure.** Any subordinate structure that is incidental to the principal use of the premises and is located on the same lot as the related main use.
3. **Accessory Use.** Any use that is subordinate and incidental to the principal use of the premises.
4. **Adjacent.** Any property that is abutting or separated by a right-of-way.
5. **Adult.** A person 18 years of age or older.
6. **Adult Establishment.** Any "adult bookstore," "adult cabaret or dancing establishment," "adult motion picture theater," or any commercial establishment which presents material or exhibitions distinguished or characterized by an emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas," as defined below for observation by patrons therein.

Specified anatomical areas.

- (1) Less than completely and opaquely covered human genitals, pubic region, buttock,

- and female breast below a point immediately above the top of the areola; and
- (2) Human male genitals in a discernible turgid state, even if completely and opaquely covered.

Specified sexual activities.

- (1) Human genitals in a state of sexual stimulation or arousal;
 - (2) Acts of human masturbation, sexual intercourse or sodomy; and
 - (3) Fondling or other erotic touching of human genitals pubic region, buttocks, or female breast.
- a. **Adult bookstore.** An establishment having, as a substantial portion of its stock in trade available for purchase or rental, books, magazines, and other periodicals, novelty items, cassette tapes, videotapes, DVDs or films which are distinguished or characterized by their emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas", as defined above, or an establishment with a segment or section devoted to the sale, rental or display of such material.
 - b. **Adult cabaret or dancing establishment.** A cabaret or dancing establishment which regularly features live performances that are characterized by the exposure of "specified sexual activities" or by "specified anatomical areas," as described above.
 - c. **Adult motion picture theater.** An enclosed building used for presenting material distinguished or characterized by an emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas," as defined above, for observation by patrons therein.
 - d. **Adult Studio.** Any building or land used for the production of adult entertainment media, such as, video, webcams, webchat, or any other internet based adult entertainment that is used for the purpose of delivering adult entertainment to any audience via the internet or by any other means.
7. **Alabama Medical Cannabis Act or Medical Cannabis Act.** Alabama Act No. 2021-450, 2021 Regular Session of the Alabama Legislature, codified at Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and which may also be cited as "the Darren Wesley 'Ato' Hall Compassion Act".
 8. **Alabama Medical Cannabis Commission or AMCC.** The state agency established by Ala. Code, 1975, § 20-2A-20, et seq., as now or hereafter amended, to regulate the medical cannabis industry in Alabama.
 9. **Alabama Medical Cannabis Commission Rules or AMCC Rules.** Administrative rules promulgated by the AMCC pursuant to the Medical Cannabis Act at Title 538 of the Alabama Administrative Code, as now or hereafter amended.
 10. **Alley.** A public right-of-way providing access to the back or side of a premises that has primary frontage on a street.
 11. **Amphitheater.** Any premises or outdoor structure specifically designed and used as a place of assembly for purpose of entertainment.

12. **Amusement (indoor).** The provision of entertainment or games of skill that is wholly enclosed in a building, such as bowling alleys, skating, billiards and pool halls, theaters, arcades, and similar types of amusement operations.
13. **Amusement (outdoor)** The provision of entertainment or games of skill where any portion of the activity takes place outside of a building, such as a stand-alone golf driving range, archery range, miniature golf course, or similar types of amusement operations. This use does not include a stadium, automotive or other types of racetracks, vehicular related activities or similar or related activities, or any uses listed within the Planned Recreational District (PRD) zoning district.
14. **Animal Boarding Facility.** Any building used for the temporary, indoor overnight boarding, care and grooming of domesticated dogs and cats.
15. **Animal Day Care.** Any building designated or arranged for the daytime care and grooming of domesticated dogs and cats. Does not include overnight boarding.
16. **Animal Kennel.** Any building(s), outdoor animal run or land designated or arranged for the care, breeding, boarding, training, or selling animals, primarily, but not limited to domesticated dogs and cats, whether by owners of such animals or by persons providing facilities and care, but shall not apply to the keeping of animals in a pet store, a laboratory for scientific or experimental purposes or in a veterinary establishment for the purpose of observation and/or recovery necessary to veterinary treatment.
17. **Apiary.** Any premises where bees are kept in hives or colonies for the production of honey.
18. **Appliance Repair.** Any building used for the repair of large appliances such as washing machine, refrigerator, and other similar items.
19. **Arena.** A large building with tiers of seats for spectators at sporting, entertainment or other recreational events.
20. **Automobile/Light Truck/Repair.** Any building used for the general repair or reconditioning of automobiles and engines, including but not limited to body, frame or fender straightening or repair, the reconditioning, repairing, sale, mounting, or installing of any tires, painting, or upholstery work, collision repair, vehicle steam cleaning, but excluding the assembly, disassembly, dismantling or salvage of automobiles, in whole or in part.
21. **Automobile Parking.** The use of property for parking or storage of operable automobiles and light trucks on a temporary basis. Such parking shall be for the use of licensed vehicles only and is not intended to include merchandise, vehicles for sale or vehicle repair.
22. **Automobile Sales.** A retail business which sells automobiles that is primarily housed in a structure and characterized by a mixture of secondary supporting uses; however, the principal

use of the site shall be the marketing and outside display of automobiles, whether by sale, rental, lease or other commercial or financial means. Secondary supporting uses may include on-site facilities for the repair and service of automobiles previously sold, rented, or leased by the dealership. No visibly disabled vehicles shall be stored on the premises.

23. **Automobile Service.** Any building used for the replacement of any part, or repair of any part, to an automobile that does not require removal of the engine head or pan, engine transmission or differential, including, but not limited to oil change and lubrication, cooling, electrical, fuel and exhaust systems, wheel alignment and balancing, brake adjustment, relining and repairs, mufflers, batteries, tire services and sales, shock absorbers, installation of stereo equipment, car alarms or cellular phones, dispensing of gasoline and motor fuels at retail, but excludes dismantling, rebuilding, reconditioning, or salvage of automobiles, in whole or in part.
24. **Bakery, Retail.** Any building used to produce and sell, to the general public, baked goods including but not limited to bread, pies, bagels, pastries, cakes and cupcakes. Retail bakeries may have seating areas for customers where retail items can be purchased and consumed.
25. **Bakery, Wholesale.** Any building used to produce and sell at wholesale, to retailers, baked goods including but not limited to bread, pies, bagels, pastries, cakes and cupcakes.
26. **Bar.** Any building where liquor, beer or wine or any combination are served for consumption on the premises, with or without food.
27. **Bed and Breakfast Inn.** A premises where overnight accommodations and a morning meal in a dwelling unit provided to transient guests for compensation.
28. **Bed and Breakfast Inn, Historic.** A premises where overnight accommodations and a morning meal in a dwelling unit provided to transient guests for compensation within an owner-occupied dwelling in a local historic district or other historically significant structure.
29. **Block-face.** All the properties abutting one side of a street and lying between the two nearest intersecting streets or between the nearest intersecting street and any railroad right-of-way, unimproved land, watercourse or City boundary.
30. **Brewery.** Any building used for the production of beer that manufactures more than 40,000 barrels per year, with a barrel containing 31 U.S. liquid gallons. A brewery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only the premises where manufactured.
31. **Brewery, Micro.** Any building used for the production of beer that manufactures less than 40,000 barrels per year, with a barrel containing 31 U.S. liquid gallons. A micro-brewery, actively and continuously engaged in the manufacture of alcoholic beverages on the

manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only the premises where manufactured.

32. **Brew Pub.** An establishment, meeting the qualifications of a brew pub under the State alcoholic beverage control laws in Title 28, Chapter 4A of the Code of Alabama 1975, as amended, where beer is actively and continuously manufactured or brewed, in a quantity not to exceed 10,000 barrels in any one year, for consumption on the premises or for sale to any designated wholesaler licensee for resale to retail licensees; and which contains a restaurant or otherwise provides food for consumption on the premises.
33. **Buffer.** An area located at the perimeter of the lot containing landscaping, berms, walls or fences that screen uses on adjacent properties from those uses occurring on the subject property.
34. **Building.** Any structure having a roof supported by columns and enclosed by walls designed or built for the support, enclosure, shelter, or protection of persons, animals, chattels, or property of any kind.
 - a. **Liner Building.** A building which is at least 24 feet deep, measured from the frontage façade, and masks a parking lot or parking structure from the frontage.
35. **Building Height.** The vertical distance from the grade level at the front façade to the highest point of the coping of a flat roof or to the deck line of a mansard roof, or to the average height between eaves and ridge for gable, hip and gambrel roofs.
36. **Bus Station.** A structure or building where City or intercity mass transit stops to pick up and drop off passengers. It is larger than a bus stop; bus station may include a terminal station for a number of routes, or a transfer station where the routes continue.
37. **Business Service.** The provision of services required for the day-to-day operation of a business such as, but not limited to, consulting service, photocopy or office supply.
38. **Business Service with Distribution.** The provision of business services that includes the warehousing and distribution of packages.
39. **Cannabis.** All parts of any plant of the genus cannabis, whether growing or not, including the seeds, extraction of any kind from any part of the plant, and every compound, derivative, mixture, product, or preparation of the plant; but excluding industrial hemp or hemp regulated under Ala. Code, 1975, § 2-8-11, as now or hereafter amended, and also excluding cannabis that is cultivated, processed, transported, stored, possessed, or used outside the Statewide Seed-to-Sale Tracking System (i.e., illicit cannabis), including but not limited to cannabis that once was included within and/or intended for placement on the Statewide Seed-to-Sale Tracking System (i.e., diverted cannabis).
40. **Car Wash, Automated.** A building or portion thereof containing facilities for washing

passenger vehicles, using production-line methods with a chain conveyor, blower, steam cleaning device or other mechanical devices within a partially enclosed structure.

41. **Car Wash, Manual.** A building or portion thereof containing facilities for washing passenger vehicles by manually operated high-pressure wands and operations that are done by hand such as auto detailing.
42. **Chicken Coop.** A building where domesticated hens are kept and the fenced area around the coop, called a run.
43. **Child.** A person under 18 years of age.
44. **Child/Adult Care.** The provision of care for individuals, who are not related to the primary caregiver, for less than 24 hours per day. These following classes are referenced:
 - a. **Accessory Child/Adult Care Center.** A facility or licensed agency that provides for the care of children or adults for periods of less than 24 hours a day and is accessory to primary use of the lot.
 - b. **Adult Care Center.** A building or structure wherein an agency, association, organization, person or group of persons, whether established for financial gain or otherwise, regularly provides care for three or more adults.
 - c. **Child Care Center.** A facility or licensed agency that provides for the care of thirteen or more children for periods of less than 24 hours a day.
 - d. **Department of Human Resources (DHR).** State of Alabama or Jefferson County Department of Human Resources.
 - e. **Family Day/Night Care Home.** A child care facility which is the family home in which the operator resides and which receives not more than six children and is licensed as a Family Day / Night Care Home by DHR.
 - f. **Family Group Day/Night Care Home.** A child care facility which is the family home in which the operator resides and which receives not more than twelve children, and is licensed as a Family Group Day / Night Care Home by DHR.
 - g. **Substitute/Alternate.** A person employed by an adult or child care provider on a part-time basis who is available to act as a care giver in the absence of the operator.
 - h. **Zoning Certificate of Operation.** A certificate of operation, issued by the Department authorizing the operation of a child or adult care facility within the City.
45. **Clinic.** A facility for examining and treating patients with medical, addictive, mental or physical problems on an outpatient basis, including ambulatory care or similar medical services that require a stay of less than 24 hours.
46. **Cold Frame.** An unheated outdoor structure with a glass or clear plastic top that protects seedlings and plants from the cold.
47. **College or University.** An institution of higher education offering undergraduate or

postgraduate degrees.

48. **Commercial Vehicle.** A commercial vehicle is any motor vehicle that has a capacity greater than one-ton or trailer over 14 feet such, but not limited to a truck, box truck, semi-truck, van, limousine, wrecker, coach or bus.
49. **Communal living facility.** Facilities in which four or more unrelated persons reside, including Assisted Living Facility, Boardinghouse, Nursing Home, Rehabilitation Facility, Sheltered Care Home, Transitional Home. Communal Living Facilities do not include child foster care facilities or facilities located in multi-family districts that are used for housing the mentally handicapped or mentally ill, where there are no more than 10 such people plus 2 unrelated persons to either the occupants of the facility or to each other. (Code of Alabama 11-52-75.1 and Board Case No. 84-95)
 - a. **Assisted living facility.** Residencies for the frail elderly that provide rooms, meals, personal care, and supervision of self-administered medication. They may provide other services such as recreational activities, financial services and transportation.
 - b. **Boardinghouse.** A dwelling, or part thereof, in which for compensation lodging and meals are provided for four or more persons.
 - c. **Nursing home.** A home for the aged or infirm in which four or more persons not of the immediate family are received, kept or provided with food and shelter or care as part of convalescence, rehabilitation or hospice for compensation; but not including hospitals, clinics or similar establishments devoted primarily to the diagnosis and treatment of the sick or injured.
 - d. **Rehabilitation Facility.** A building used for the provision of treatment for addictive, mental or physical disabilities for 24 hours a day to four or more persons.
 - e. **Transitional home.** A facility in which four or more individuals live for a short period while receiving social psychological or similar therapy or counseling excluding jails, prisons, and other correctional institutions.
 - h. **Sheltered Care Home.** A dwelling for the sheltered care of persons with special needs, which, in addition to providing food and shelter, may also provide some combination of personal care, social or counseling services, and transportation.
50. **Community Garden.** A property used for cultivation and harvesting, for useful and productive purposes, food crops and/or ornamental crops for personal use, donation off-premise sale or on-premise sale in residential districts when a special exception is granted by the Board.
51. **Composting Facility (Solid Waste Treatment Facility).** A commercial or public solid waste processing facility where yard or garden waste, manure and other putrescible materials are transformed into soil or fertilizer by biological decomposition.
52. **Conditional Use.** A use or occupancy of a structure, or a use of land, permitted only upon review and approval of a site plan and subject to the limitations and conditions specified in Chapter 4, Article II of this Ordinance.

53. **Condominium.** The form of ownership of real or personal property or a combination thereof under a declaration providing for ownership of units of the property by one or more owners together with an undivided interest in common and limited common elements.
54. **Conservation Subdivision.** A residential development wherein a portion of the site is preserved as permanent undisturbed natural area, to continuously protect, environmental features. Conservation subdivisions are characterized by clustering of homes, reduced lot sizes, and provision of an undisturbed natural area to enable the preservation and maintenance of environmental features.
55. **Construction.** Is the development of physical improvements on a site such as, but not limited to, water and sewer lines, footings, and/or foundations. Clearing, grading, the storage of building materials or the placement of temporary structures on a site shall not constitute beginning construction.
56. **Contractor Yard.** The construction and incidental storage activities performed by construction contractors on lots other than construction sites.
57. **Convenience Store.** A retail establishment selling primarily food products household items, newspapers, and magazines, candy, and beverages and in which gasoline and other motor fuels, are dispensed at retail, by use of fixed approved dispensers. Convenience stores may include an automated car wash for washing one automobile at a time, within an enclosed building.
58. **Convention Center.** Any building designed and used to accommodate 1,000 or more persons and used for conventions, conferences, seminars, product displays, recreation activities, and entertainment functions, along with accessory functions including food and beverage preparation and service for on-premise consumption.
59. **Cottage Development.** A grouping of single-family dwellings clustered around a common area, in which not all lots front on a public street and is provided access by a shared driveway or alley.
60. **Country Club/Golf Course/Swim or Tennis Club.** A public or private establishment operated for the purpose of playing golf, swimming or playing tennis that may include an accessory office, retail pro shop, restaurant, banquet facilities, lounge, golf driving range, caretaker's dwelling unit, and golf/tennis academy.
61. **Dairy, Factory.** A building where raw milk is processed into milk, butter, yogurt, cheese or other dairy product.
62. **Dairy, Farm.** Any premises where milk is harvested from cows.
63. **Director.** The Director of the Department of Planning, Engineering and Permits of the City

of Birmingham, or his designee.

64. **Distillery.** Any building used for the production of liquor in quantities exceeding 1,000 barrels per month, with a barrel containing not more than 55 U.S. liquid gallons. A distillery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only one premises where manufactured.
65. **Distillery, Artisanal.** Any building used for the production of liquor in quantities not to exceed 1,000 barrels per month, with a barrel containing not more than 55 U.S. liquid gallons. An artisanal distillery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only one premises where manufactured.
66. **District.** A classification for which the zoning regulations governing the use of buildings and premises, the height and location of buildings, the size of yards, and the intensity of use are compatible.
67. **Donation Box.** A temporary accessory structure placed by a non-profit in a side or rear yard of certain commercial and industrial districts to collect clothing and other household items.
68. **Donation Center.** A facility located on the premises of a principal institutional use where donated items including clothing, furniture, house wares, small electrical appliances, household textiles, toys, and other small household items are collected.
69. **Dressmaker/Tailor/Millinery.** An establishment for producing clothing and hats for individuals at retail only.
70. **Drive-In/Drive-Through.** Any establishment where services are rendered or items are sold, for consumption on-site or off-site, and orders are made from a car to a server at a window, or via a speaker and receiver, or via an automated device.
71. **Driving Range, Free-Standing.** A facility equipped with distance markers, clubs, balls, and tees for practicing golf drives and putting, and which may include a snack-bar and pro-shop, but excludes miniature golf courses and "putt-putt" courses.
72. **Dwelling, Accessory.** One or more rooms located within an accessory structure and forming a single habitable unit with facilities which are used or intended to be used for living, sleeping, cooking and eating purposes that supports only one family. Accessory dwellings are subject to conditions listed in Chapter 4, Article IV, Section 2, Item B.
73. **Dwelling, Caretaker.** A residence, incidental to a principal use, for an on-site manager, security guard or caretaker employed on the premises.

74. **Dwelling, Single-Family Detached.** A building containing one dwelling unit and that is not connected to any other dwelling or principal building and designed for or occupied exclusively by one family.
75. **Dwelling, Townhouse.** A building on its own recorded lot connected to another primary structure occupied exclusively by one family that is attached by common walls to a like building. See Chapter 4, Article II, Section 2.
76. **Dwelling, Duplex, Triplex, Quadplex.** A building divided horizontally or vertically containing two, three or four dwelling units respectively on one lot where each unit independently supports one family.
77. **Dwelling, Multiple-Family.** A building containing five or more dwelling units.
78. **Dwelling Unit, Other.** One or more rooms located within a building and forming a single habitable unit with facilities which are used or intended to be used for living, sleeping, cooking and eating purposes that supports only one family.
79. **Electronics Repair.** Any building used for the repair of small electronics such as personal computers, phones, and other small electronics.
80. **Event Center.** Any building where the primary use is staging of temporary events, and may be operated by a vendor for the purpose of renting space for private functions.
81. **Façade.** That portion of any exterior elevation on a building extending from grade to top of the parapet, wall, or eaves and the entire width of the building elevation.
82. **Family.** One or more persons occupying a dwelling and living as a single housekeeping unit, all of whom or all but two of whom are related to each other by birth, adoption or marriage as distinguished from a group occupying a communal living facility.
83. **Farmer's Market.** Premises where outdoor sales sanctioned by the State of Alabama Farmer's Market Authority, consisting of whole uncut produce, ornamental crops and value-added agricultural products such as baked goods, jams and jellies, pickles and relish, dried fruits, syrups and honey, eggs, meat, nuts and handmade art and crafts.
84. **Fence or Wall.** A structure, solid or otherwise, erected, placed, or constructed on a property, which is intended to be a barrier, boundary, enclosure, privacy feature, or decorative item. It is characteristic of such an item that it is normally a separate "stand-alone" structure, erected along the perimeter (or close to the perimeter) of a property.
85. **Financial Institution.** Any building, room, space or portion thereof where an establishment provides a variety of financial services, and are limited to, federally insured banks, credit

unions, and mortgage companies.

86. **Fitness Center.** A building and premises containing recreational facilities such as gymnasiums, swimming pools or playing fields that is available to the membership of a club.
87. **Flea Market.** Premises where outdoor sales consisting of individual stalls used for selling various types of merchandise such as used household items, and cut-rate goods.
88. **Fraternity/Sorority House.** Living quarters that may be used for gathering or entertaining for private social organizations serving students of colleges or universities and located on the campus as depicted on the approved master plan of the college or university.
89. **Frontage.** The area between a building frontage façade and a path, passage, waterbody, civic space, or the curb (or if there is no curb, the edge) of the vehicular lanes of a thoroughfare having vehicular lanes, inclusive of the built and planted components of such area. Frontage is divided into private frontage and public frontage.
90. **Frontage Façade.** A façade that is set along a frontage line.
91. **Frontage Façade Void Area.** The area of a frontage façade not comprised of walls; including windows, doors and other openings in the wall. Frontage façade
92. **Funeral Home.** A building designed for the purpose of furnishing funeral supplies and services to the public and includes facilities for the preparation of the human body for interment and/or cremation.
93. **Furniture Store.** A retail store where furniture is displayed, stored and offered for sale.
94. **Garage, private.** An accessory building or part of a principal building designed or used for the storage of motor-driven vehicles owned and used by the occupants of the building to which it is accessory.
95. **Garage Sale/Yard Sale.** A sale of personal property by homeowner or occupant of real property.
96. **Grade Level.** For buildings the average level of the finished ground surface at the front façade of a building. For signs, trees, landscaping and light fixtures, the level of finished ground surface at the base of the sign, tree, plant or fixture.
97. **Greenhouse/Hoophouse.** A temporary or permanent structure where plants are cultivated and that is typically made of, but not limited to, glass, plastic, piping, translucent plastic or fiberglass.
98. **Greenway.** An open space conservation area that provides passive recreational

opportunities, pedestrian and/or bicycle paths, and/or the conservation of open spaces or natural areas.

99. **Gross Floor area.** The gross horizontal areas of all floors, measured from the exterior faces of the exterior walls of a building, and any outdoor seating area or patio used by restaurants or bars.
100. **Heavy Equipment Sales and Service.** The retail or wholesale sale or rental of heavy motorized vehicles or equipment, along with service, repair or maintenance such as, but not limited to construction equipment rental yards, tractor-trailers, semi-trailers, buses, and farm equipment.
101. **Heliport.** Any premises used for landing helicopters for loading and unloading of occupants of the aircraft, excluding maintenance and fueling.
102. **Home Improvement Store.** The retail sale of a diverse range of hardware and related materials generally used in the maintenance, repair or construction of buildings or other structures, including lawn and garden supplies, and may include outside display of finished product or packaged materials.
103. **Home Occupation:** An activity carried out for financial gain by a resident, with an approved business license from the City, and conducted entirely within the resident's dwelling unit. Home occupations are accessory, incidental, and secondary to the use of the building for dwelling purposes and does not change the essential residential character or appearance of such building.
104. **Hospital.** Any institution, building or other premises established for the maintenance, observation, medical or dental care and supervision and skilled nursing care of persons suffering from sickness, disease or injury or for the convalescent or chronically ill persons.
105. **Hotel/Motel.** An establishment offering sleeping accommodations to guests. Hotels may include, as an integral part of operations, a restaurant, bar, conference rooms, banquet or ballrooms, gift shop, recreation facility and a caretaker dwelling.
106. **Internment, Cemetery.** Any land used for the interment of the dead which may include buildings for the purpose of preparing the dead for interment or cremation and structures such as mausoleums and columbariums.
107. **Internment, Columbarium.** A structure designed to store the ashes of human remains that have been cremated, in niches or cinerary urns.
108. **Internment, Mausoleum.** A building or other structure used as a place for the interment of the dead in sealed crypts or compartments.

109. **Junkyard, general.** A premises used for the outside storage or placement of used and/or damaged materials and items.
110. **Junkyard, vehicular.** A premises used for the outside placement, storage, parking, dismantling, or disassembling of any disabled or inoperable vehicles, or parts thereof, including, but not limited to motors, tires, wheels, axles, transmissions and other accessories.
111. **Landfill.** A method of compaction and earth cover of solid wastes that does not contain garbage or other putrescible wastes, including, but not limited to, tree limbs and stumps, demolition materials, incinerator residues, and like materials not constituting a health or nuisance hazard, such as hazardous waste or medical waste, where cover need not be applied on a per day used basis.
112. **Landfill, Sanitary.** A controlled area of land upon which non-hazardous and non-medical farm, residential, institutional, commercial or industrial solid waste is deposited and is covered with compacted earth each day as deposited, with no on-site burning of wastes, and so located, contoured, and drained that it will not constitute a source of water pollution as determined by the Alabama Department of Environmental Management (ADEM).
113. **Landscape Plan.** A document, prepared by an Architect, Landscape Architect or other design professional with special knowledge of landscaping standards, that depicts location, character and extent of landscaping, and shall include plant location, corresponding plant schedule, planting instructions, and must include a combination of shrubs, trees and ground cover.
114. **Laundry Plant.** Any building or structure in which articles of clothing and goods are subjected to the process of dry cleaning, and pressing of such articles.
115. **Legal Non-conforming use.** The use of any building or land which was lawful prior to the adoption or amendment of this Ordinance or does not conform to the amendments of this Ordinance or to the present requirements of the applicable district, or a use that has been granted resumption of legal non-conforming use by the Zoning Board of Adjustment (Board), but that is in compliance with Chapter 9, Article VII.
116. **Livestock Barn.** Any structure or premises used for the boarding, breeding and/or raising of domestic livestock (excluding swine, sheep and goat), whether by owners of such animals or by persons providing facilities and care.
117. **Lot.** A plot, unit, or other portion of land in a subdivision or plat of land, having its principal frontage on a street, except that cottage subdivisions may have a portion of the units face interior common area and up to 20 percent of lots in character districts may have frontage on a path or passage if such lots have legal and physical vehicular access to a vehicular thoroughfare via driveway or easement, separated from other such portions by description on a record of survey map, for the purpose of ownership, sale, occupancy, use, construction or development, separate from other lands.

118. **Lot, corner.** A lot abutting upon two or more streets at their intersection.
119. **Lot, through.** A lot other than a corner lot abutting two streets.
120. **Lot of record.** A lot recorded in the office of the probate judge in the county where it is located prior to the adoption of subdivision regulations. If a portion of a lot or parcel has been conveyed prior to adoption of subdivision regulations, the remaining portion of such lot shall also be considered a lot of record.
121. **Lot width.** The width of the lot at the front building setback line.
122. **Manufactured Home.** A pre-fabricated dwelling unit that must have a Federal Manufactured Home Construction and Safety Standards label, a HUD label of approval and manufactured date later than June 15, 1976, and an Alabama Manufactured Housing Commission insignia and date plate.
123. **Manufacturing, Heavy.** The manufacture or compounding process of raw materials. These activities or processes may necessitate the storage of large volumes of highly flammable, toxic matter or explosive materials needed for the manufacturing process, and may generate dust, odor, heat, glare and vibration. These activities may involve outdoor operations as part of their manufacturing process. Typical heavy manufacturing uses include but are not limited to: concrete batch plants; concrete, tile, or brick manufacturing; automobile, truck, and tire assembly; ammonia or chlorine manufacturing; metal casting or foundries; gas manufacturing; grain milling or processing; metal or metal ore production, refining, smelting, or alloying; petroleum or petroleum product refining; boat, pool and spa manufacturing; slaughtering of animals; glass manufacturing; paper manufacturing; manufacturing of raw materials into compost, and wood or lumber processing.
124. **Manufacturing, Light.** The manufacture, predominately from previously prepared materials, of finished products or parts, including processing, fabrication, assembly, treatment and packaging of such products, and incidental storage, sales and distribution of such products, but excluding basic industrial processing. These activities do not necessitate the storage of large volumes of highly flammable, toxic matter or explosive materials needed for the manufacturing process. Typical light manufacturing uses include but are not limited to: electronic goods; food and bakery products; non-alcoholic beverages; alcoholic beverages; dry cleaning plants; paper imprinting; household appliances; leather products; jewelry; food and bakery products; and clothing apparel.
125. **Manufacturing, Specialized.** Facilities engaged in the assembly, design, repair, or testing of: analyzing or scientific measuring instruments; semiconductor and related solid state devices, including but not limited to: clocks, integrated microcircuits, jewelry, medical, musical instruments, photographic or optical instruments, or timing instruments, and assembly of hand held finished products or any custom architectural or artisan industry.

characterized as light industry, that does not have an ADEM permit for pollution release or noise, odor, illumination, trucking, or other adverse impacts to surrounding uses.

126. **Market Manager.** Individual that is responsible for the operation of a Farmer's and/or Public Market.
127. **Medical Cannabis.** A medical grade product grown and processed within the State of Alabama, in one of the approved forms set forth in Ala. Code, 1975, § 20-2A-3(14), as now or hereafter amended, that contains a derivative of cannabis for medical use by a registered qualified patient pursuant to the Medical Cannabis Act and the AMCC Rules.
128. **Medical Cannabis Cultivator.** An entity licensed by the AMCC (or, as applicable, the Department of Agriculture and Industries) under Ala. Code, 1975, § 20-2A-62, as now or hereafter amended, authorized to grow cannabis pursuant to the Medical Cannabis Act, the AMCC Rules, and the rules of the Alabama Department of Agriculture and Industries at Title 80 of the Alabama Administrative Code, as now or hereafter amended.
129. **Medical Cannabis Dispensary.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, authorized to dispense and sell medical cannabis at dispensing sites to registered qualified patients and registered caregivers pursuant to the Medical Cannabis Act and the AMCC Rules.
130. **Medical Cannabis Integrated Facility.** An entity licensed under Ala. Code, 1975, § 20-2A-67, as now or hereafter amended, authorized to perform the functions of a cultivator, processor, secure transporter, and dispensary pursuant to the Medical Cannabis Act and the AMCC Rules.
131. **Medical Cannabis Processor.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-63, as now or hereafter amended, authorized to purchase cannabis from a cultivator and extract derivatives from the cannabis to produce a medical cannabis product or products for sale and transfer in packaged and labeled form back to the contracting cultivator, if applicable, or to a dispensary site or integrated facility where the packaged and labeled product may be offered for sale at a dispensary site to holders of a valid, unrevoked and unexpired Medical Cannabis Card, pursuant to the Medical Cannabis Act and the AMCC Rules.
132. **Medical Cannabis Secure Transporter.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-65, as now or hereafter amended, authorized to transport cannabis or medical cannabis from one licensed facility or site to another licensed facility or site pursuant to the Medical Cannabis Act and the AMCC Rules.
124. **Medical Cannabis State Testing Laboratory.** An entity licensed under Ala. Code, 1975, § 20-2A-66, as now or hereafter amended, authorized to test cannabis and medical cannabis to ensure the product meets safety qualifications and efficacy requirements pursuant to the Medical Cannabis Act and the AMCC Rules.

125. **Medical Lab.** A facility for analytic or diagnostic research or investigation of a medical nature on blood, tissue, or other human or animal components, but not for the production of a product.
126. **Mini-storage Warehouse.** A building or group of buildings containing separate, individual spaces available for lease or rent for storage purposes only.
127. **Mixed-Use Development.** Premises that integrates a combination of retail, office, residential, hotel, recreation or other function.
128. **Mobile Grocery Store.** A motorized vehicle, trailer, or other portable unit drawn by a motorized vehicle from which food items are sold or distributed. The mobile grocery store may not exceed 26 feet in length. No preparation or assembly of food items or beverages may take place from the unit. Food items may include fresh fruit, vegetables, meat, dairy, pantry staples, or small household items. A mobile grocery store shall not be allowed to operate in the City's right-of-way without authorization or permission from the City.
129. **Motor Freight, Distribution.** Facilities engaged in the shipment of goods from shippers to receivers for a charge including the services of other transportation establishments to effectuate delivery.
130. **Nursery.** Any premises used for the retail and wholesale sale of plants grown on or off site, as well as accessory items such as clay pots, potting soil, fertilizers, insecticides, hanging baskets, rakes and shovels, but not power equipment such as lawnmowers or tractors.
131. **Office.** A room or group of rooms where the principal use is conducting the affairs of a business, profession, service, industry or government and generally furnished with desks, tables, files and communication equipment.
132. **Office, Institutional.** Any building used as an office for charitable non-profit organizations that may hold meetings on a regular basis, and charity events on a temporary basis.
133. **Office, Leasing/Sales.** The use of a unit or dwelling as a leasing and or sales office for other units solely within that development.
134. **Office Warehouse.** Any building used for the combined uses of office and warehouse, where the office function is the principal use (at least 60% of the gross floor area) of the building, for the primary purpose of wholesale trade, display, and distribution of products.
135. **Off-Premise Sign.** Any permanent or temporary sign which directs the attention of the general public to a business, service, product or activity not conducted, offered or sold as a major portion of business upon the premises where such sign is located.
136. **Open Space.** Land not covered by man-made impermeable surfaces, parking or buildings,

other than recreational structures, pools, or stormwater facilities, which may be landscaped or preserved in a natural state for private use of owners or guests, or for public access as may be required by the provisions of these regulations or the zoning ordinance.

137. **Opioid.** An opioid is a class of addictive narcotic drugs that are often prescribed for severe pain relief but also are frequently used (and abused) illegally to create euphoric states of consciousness. Common types of opioids are heroin, codeine, and morphine.
138. **Opioid Replacement Therapy Treatment Facility.** Any operation that has received a Certificate of Need from the State Health Planning and Development Agency of Alabama to operate a facility to prescribe and/or dispense opioid replacement drugs and offer therapy to individuals and groups as a part of a treatment program. These opioid replacement drugs generally include, but not limited to, methadone, naloxone, naltrexone, and similar types of opioid receptor agonists.
139. **Public Market.** Premises where outdoor sales consisting of whole uncut produce, ornamental crops, value-added agricultural products such as baked goods, jams and jellies, pickles and relish, dried fruits, syrups and honey, eggs, meat, nuts, handmade art and crafts and unique local goods. Sales of used clothing, mass produced items and appliances are prohibited.
140. **Park.** Any facility or property specifically designated as a park, natural area or recreation area that is used for recreational uses or predominately kept in a natural state.
141. **Pawnshop.** Any building or portion thereof where a pawnbroker is engaged in lending money on the security of pledged goods left in pawn, or in the business of purchasing personal property to be left in pawn on the condition it may be redeemed by the seller for a fixed price within a fixed period of time, as regulated by Title 5, Chapter 19A of the Code of Alabama.
142. **Payday Loan (Deferred Presentment) Business.** A business that, in accordance to the requirements and restrictions listed in Chapter 18A of Title 5 of the Code of Alabama (Alabama Deferred Presentment Services Act), involves a transaction pursuant to a written agreement involving the following combination of activities in exchange for a fee: (1) accepting a check or authorization to debit a checking account and, in connection with that acceptance, advancing funds to the checking account holder; and (2) holding the check or authorization to debit the checking account for a specified period of time.
143. **Personal Care Services.** Services such as, spas, tanning salons, beauty and barber care, and dry cleaning and laundry services not to include a laundry plant.
144. **Personal Instruction.** Services for training individuals or groups in the arts, dance, personal defense, crafts or other subjects of a similar nature.
145. **Place of Worship.** Any structure or site used primarily for religious practices.

146. **Power Plant.** Any structure or land used for the generation of electrical power.
147. **Premises.** A lot, parcel or acreage parcel together with all buildings and structures existing thereon.
148. **Principal Building.** A building that contains the principal use located on a premises.
149. **Principal Frontage.** With respect to corner lots, the private frontage designated to bear the address and principal entrance to the building, and the measure of minimum lot width. For corner lots, prescriptions for the location of parking in certain lot layers pertain only to the principal frontage and prescriptions for the first lot layer pertain to both frontages of a corner lot. With respect to non-corner lots, principal frontage is synonymous with frontage.
150. **Principal Use.** The main use located in a building or on a premises.
151. **Printing and Publishing.** The production and distribution of books, magazines, newspapers and other printed matter, including record pressing and publishing, and engraving.
152. **Private Club.** A building or portion thereof or premises owned or operated by a corporation, association, person or persons for a social, educational, or recreational purpose, but not primarily for profit or to render a service which is customarily carried on as a business.
153. **Public building.** Any building that is accessible to the public and its operation is funded from public sources.
154. **Racetrack.** Any premises or building that includes a measured course where animals or machines are entered in competition against one another or against time, including tracks that are used for drifting.
155. **Railroad Station.** A building or structure where railroad cars stop to load and un-load passengers.
156. **Railroad Yard.** The use of land, building or structure for activities directly associated with the operation of a railroad such activities may include loading and off-loading of freight, and maintenance and repair of railroad cars.
157. **Recreation Equipment Sales and Service.** The retail or wholesale sale of motorcycles, trucks and vans, recreational vehicles, boats, or similar motorized recreational equipment, along with incidental service or maintenance such as, but not limited to boat dealers, motorcycle dealers, and recreational vehicle dealers.
158. **Recycling (Recovered Materials) Collection Center.** A drop-off facility that is staffed and fenced for the temporary assemblage of small, recovered materials or recyclable consumer items, such as food and beverage containers, fabrics and paper, that has waste receptacles on

site that are open to the public.

159. **Recycling Facility (Solid Waste Treatment Facility).** A facility, other than a facility open to the public to receive household waste and recyclable material, where any method, technique, or process is utilized to separate, process, modify, convert, treat or otherwise prepare non-putrescible waste so that component materials or substances may be used or reused or sold to third parties for such purposes.
160. **Resource Extraction.** The extraction of minerals or materials, including rock crushing, screening and the accessory storage of explosives.
161. **Restaurant.** Any establishment where food is prepared and sold for consumption on-site or as take-out.
162. **Retail.** An establishment engaged in the selling or renting of goods or merchandise (usually to the general public for personal use or household consumption, although they may also serve business and institutional clients) and in rendering services incidental to the sale of such goods.
163. **Rummage Sale.** A sale of personal property or other merchandise for the express purpose of raising charitable donations for the benefit of the entity holding the sale by a place of worship, charitable, or civic organization.
164. **Salvage Yard.** Any land or building used for the storage of recovered materials for the purpose of recycling, reuse, or proper storage for future recycling or reuse.
165. **School, Business.** An enterprise offering instruction and training in a service or the arts such as secretarial, cosmetology, commercial artist, computer software, legal, and similar training, provided that such enterprise does not offer student housing or athletic facilities at the site.
166. **School, Elementary/Middle.** Any building used for public primary instruction or a parochial or private school having a curriculum including the same courses ordinarily given in a public school that may include accessory structures such as a gymnasium.
167. **School, High.** Any building used for public secondary instruction or a parochial or private school having a curriculum including the same courses ordinarily given in a public school that may include accessory structures such as a gymnasium or stadium.
168. **School, Trade.** Any building used for the offering of regularly scheduled instruction in technical, commercial or industrial trade skills.
169. **Scientific Lab.** A facility primarily engaged in performing physical, chemical, and other analytical testing services or investigation and experimentation of a scientific nature and other scientific research, but not for the production of a product.

170. **Scrap Metal Processor.** Any building or land used for the storage, purchase or sale of scrap metal which may include the grading, cutting, preparing, processing or refining of scrap metal for sale and shipment to industrial consumers.
171. **Shopping Center.** A group of commercial-retail establishments planned, developed, owned or managed as a unit with off-street parking provided on the property. Any out-parcel within a shopping center shall be developed under a separate site plan.
172. **Sign.** A sign is any object or device or part thereof situated outdoors or indoors which is used to advertise or identify a person, institution, organization, business, product, service, event or location by any means including words, letters, figures, designs, symbols, fixtures, colors, illumination or projected images. Signs do not include merchandise, pictures or models of products or services incorporated in a window display.
173. **Solar Panel, Building Mounted.** A solar energy collection device mounted to a structure.
174. **Solar Panel, Ground Mounted.** A solar energy collection device mounted to the ground.
175. **Solid Waste Transfer Facility.** Any building used to receive and temporarily store solid waste prior to being delivered to a sanitary landfill or other solid waste facility.
176. **Special Exception.** An action where permission is granted to establish that a use be allowed within a district after the Board determines that the use as proposed would not disturb public health, safety, welfare, comfort, convenience, appearance, prosperity or general welfare.
177. **Stable.** Any lot, building, structure or premises used for the boarding, breeding, training, and/or raising of horses, whether by owners of such animals or by persons providing facilities and care.
178. **Stadium.** A large open space with tiers of seating for spectators surrounding a field used for sporting, entertainment or recreational events.
179. **Story.** That portion of a building other than a cellar, included between the surface of any floor and the surface of the floor next above it, or, if there be no floor above it, then the space between the floor and the ceiling next above it.
180. **Street.** A public right-of-way for movement of motor vehicles, pedestrians or non-motorized traffic, whether identified as a street, highway, thoroughfare, parkway, throughway, road, avenue, boulevard, lane, place, or however designated.
181. **Street Line.** A dividing line between a lot, tract or parcel of land and an abutting street.
182. **Street Setback.** The distance a building or structure shall be setback from a front, side or rear lot line. Street setback may be referred to as a front, side or rear setback or front, side or

rear yard.

183. **Structure.** Anything constructed or erected, the use of which requires a location on the ground or attached to something having a location on the ground, including but not limited to buildings, signs, billboards, back stops for tennis courts, fences or radio towers.
184. **Structural Alterations.** Any change in the supporting members of a building or structure, such as bearing walls, columns, beams or girders; provided, however, that the application of any exterior modernizing shall not be considered a structural alteration.
185. **Studio, Radio/TV.** A facility for the staging and recording of video or audio productions such as, but not limited to, music commercials, programs, and motion pictures. Any broadcasting antennas or satellites are subject to the regulations of Chapter 4, Article V of this Ordinance.
186. **Subdivision Committee.** A committee composed of five (5) members of the Commission authorized to hear and decide upon applications for subdivisions of land, and to advise the chief legislative body of the City on vacation of public lands and new right-of-way dedications, all such actions to be taken on behalf of the Commission.
187. **Tank Farm.** Any land or structure used for the storage of one or more aboveground large containers for the bulk storage of material in liquid, powder or pellet form. Items stored at these facilities are intended to be wholesaled to retailers, and no retailing of stored items can occur on site.
188. **Timbering.** Any premises used for the harvesting of timber.
189. **Title Loan Business.** Any business that offers a short term loan that is collateralized by the title of a vehicle in accordance with the requirements and restrictions described and detailed in Chapter 19A of Title 5 of the Code of Alabama (Alabama Pawn Shop Act).
190. **Truck Plaza.** Any building premises or land in which or upon which a business may engage in the service, maintenance or storage of commercial vehicles including dispensing of motor fuel or petroleum products directly into motor vehicles. A truck plaza also may include overnight accommodation, restaurant and truck wash facilities.
191. **Truck Repair, Heavy.** Any building or land used for the general repair or reconditioning of heavy trucks and equipment and engines, including but not limited to body, frame or fender straightening or repair, the reconditioning, repairing, sale, mounting, or installing of any used tires, painting, or upholstery work, collision repair, vehicle steam cleaning, but excluding the assembly, disassembly, dismantling or salvage of any vehicle, in whole or in part. No abandoned or inoperable vehicles shall be stored on the premises.
192. **Upholstery Shop.** Any building used for the minor repair of furniture and replacement of upholstery to household and office furnishings but does not include motor vehicle

upholstering or repair.

193. **Urban Farm, Outdoor.** An outdoor commercial farm that produces and distributes food crops, ornamental crops and other agriculture products, such as honey, either for sale on site or off site utilizing traditional farming methods, hydroponics or aquaculture.
194. **Urban Farm, Indoor.** An enclosed commercial farm that produces and distributes food crops, ornamental crops and other agriculture products for sale on site or off site utilizing hydroponics or aquaculture, and is completely enclosed within a building. Outside storage is prohibited.
195. **Utility Substation.** A facility that regulates electric current, telephone switching or natural gas pressure for distribution to individual neighborhoods.
196. **Variance.** A departure from any provision of this Ordinance for a specific parcel, except use, without changing the zoning ordinance or the underlying zoning of the parcel. A variance is intended to be granted on rare occasions, when demonstration of unnecessary hardship based on the review standards set forth in Chapter 9, Article VI in relation to other properties in the same zoning district.
197. **Veterinarian Clinic.** An enterprise for the medical treatment of animals and for the temporary, indoor overnight boarding, care, grooming and convalescence of domesticated dogs and cats.
198. **Warehouse.** A facility used primarily for the bulk storage of goods and materials or motor vehicles, characterized by heavy trucking activity, but not involved in manufacturing or production.
199. **Wholesale.** The sale or distribution of goods from the premises that may consist of the flexible use of the floor area for warehouse, assembly, showroom and office space.
200. **Wireless Communication.** Towers, antennas and accessory buildings for transmitting and receiving radio, television, satellite, cellular and microwave, and broadcast tower.
201. **Wrecker Impound Lot.** Any land used for the outside storage of operable vehicles awaiting final disposition.
202. **Wrecker Service Yard.** Any land used for the temporary outside storage of disabled vehicles awaiting final disposition. This definition shall not be applicable to junkyards as defined herein.
203. **Yard.** An open space between a building or use and the adjoining lot lines, unoccupied and unobstructed by any structure or use from the ground upward, except as otherwise provided in Chapter 3: Area and Dimensional Regulations.

204. **Yard, Required.** A yard the depth of which is specified in Chapter 3: Area and Dimensional Regulations of the applicable district.
205. **Yard, front.** A yard extending the full width of the lot between any building and the front lot line and measured perpendicular to the building at the closest point to the front lot line. On corner lots the front yard shall be considered as parallel to the street upon which the lot has its least dimension.
206. **Yard, rear.** A yard extending across the full width of the lot between the principal building and the rear lot line and measured perpendicular to the building to the closest point of the rear lot line.
207. **Yard, side.** A yard extending from the front yard to the rear yard between the principal building and the side lot line and measured perpendicular from the side lot line to the closest point of the principal building.
208. **Zoning Advisory Committee.** A committee composed of seven members of the Commission authorized to approve site development plans, hear and recommend rezoning of land applications and Zoning Ordinance text changes to advise the chief legislative body of the City, all such actions to be taken on behalf of the Commission.
209. **Zone map.** The map referred to in Chapter 9, Article I (Official Zoning Map).
210. **Zoning district map.** The Zone Map.
211. **Zoo.** Any premises, building or enclosure which contains wild animals on exhibition for viewing by the public.

SECTION 2. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 2: Zoning Districts and Permitted Uses; Article II: Permitted Uses Table; Section 6: Permitted Use Table 1.02.201 - MEDICAL USES, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Zoning District	D-1	D-2	D-3	D-4	D-5	D-6	MU-L	MU-M	MU-H	MU-D	C-1	C-2	I-1	I-2	I-3	I-4	PR-D	MCD-FLD	HI-D	AG
MEDICAL USES:																				
Clinic	X	X	X	X	X	X	PC	F	F	F	PC	F	F	F	F	X	X	PCP	PM-P	X
Hospital	X	X	X	X	X	X	X	SE	F	F	X	F	F	X	F	X	X	PCP	PM-P	X
Medical Cannabis Cultivator	X	X	X	X	X	X	X	X	X	X	X	X	PC	PC	PC	X	X	X	X	PC
Medical Cannabis Dispensary	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Cannabis Integrated Facility	X	X	X	X	X	X	X	X	X	X	X	X	PC	PC	PC	X	X	X	X	X
Medical Cannabis Processor	X	X	X	X	X	X	X	X	PC	PC	X	X	PC	PC	PC	X	X	X	X	X
Medical Cannabis Secure Transporter	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Cannabis State Testing Laboratory	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Lab	X	X	X	X	X	X	X	SE	F	F	SE	F	F	F	F	X	X	PCP	PM-P	X
Opioid Replacement Therapy Treatment Facility	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	X	X	X	X	X	X
Scientific Lab	X	X	X	X	X	X	X	X	SE	SE	X	SE	F	F	F	X	X	PCP	PM-P	X
Veterinarian Clinic	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	PC	PCP	PM-P	PC

SECTION 3. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 4: Land Use Development Standards; Article II: Uses Permitted With Conditions (PC); Section 4: Medical Uses, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Section 4. Medical uses.

- A. **Clinic.** In the following districts: MU-L and C-1 a clinic shall be permitted provided that the following conditions are met:
 - 1. Clinics shall be limited in size to no more than 7,500 square feet.

- B. **Medical Cannabis Cultivator.** In the M-1, M-1A, M-2, M-3, I-1, I-2, I-3, and AG districts, a medical cannabis cultivator shall be permitted provided the following conditions are met:
 - 1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, and/or the Alabama Department of Agriculture and Industry that the proposed facility meets the requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
 - 2. Cultivators authorized pursuant to Ala. Code, 1975, § 20-2A-62, as now or hereafter amended, shall operate in accordance with the provisions set forth in Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission and the Department of Agriculture and Industry. Except as specifically provided in this Section, Cultivators shall be governed by the Medical Cannabis Act, the AMCC Rules and the rules of the

Alabama Department of Agriculture and Industries at Title 80 of the Alabama Administrative Code, as now or hereafter amended.

- C. **Medical Cannabis Dispensary.** In the B-2, B-3, B-4, B-5, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis dispensary shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
 2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.
- D. **Medical Cannabis Integrated Facility.** In the M-1, M-1A, M-2, M-3, I-1, I-2, and I-3 districts, a medical cannabis integrated facility, shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
 2. Medical Cannabis Integrated Facility authorized pursuant to Ala. Code, 1975, § 20-2A-67, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis Integrated Facilities shall be governed by the Medical Cannabis Act and the AMCC Rules.
- E. **Medical Cannabis Processors.** In the B-3, B-4, M-1, M-1A, M-2, M-3, MU-H, MU-D, I-1, I-2, and I-3 districts a medical cannabis processor shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter

stating that fact from this agency must be provided.

2. Medical Cannabis Processors authorized pursuant to Ala. Code, 1975, § 20-2A-63, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission. Except as specifically provided in this Section, Medical Cannabis Processors shall be governed by the Medical Cannabis Act and the AMCC Rules.

F. **Medical Cannabis Secure Transporter.** In the B-2, B-3, B-4, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis secure transporter shall be permitted provided the following conditions are met:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.

2. Medical Cannabis Secure Transporters authorized pursuant to Ala. Code, 1975, § 20-2A-65, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis Secure Transporters shall be governed by the Medical Cannabis Act and the AMCC Rules.

G. **Medical Cannabis State Testing Laboratory.** In the O&I, B-2, B-3, B-4, B-5, B-6, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis state testing laboratory shall be permitted provided the following conditions are met:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.

2. Medical Cannabis State Testing Laboratories authorized pursuant to Ala. Code, 1975, § 20-2A-66, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis State Testing Laboratories shall be governed by the Medical Cannabis Act and the AMCC Rules.

H. **Opioid Replacement Therapy Treatment.** In the MU-H, MU-D, C-2, I-1, and I-2 district, opioid replacement therapy treatment shall be permitted provided that the following

conditions are met:

1. The applicant submits a statement from the State Department of Health, State Health Planning and Development Agency, or the State Department of Mental Health and/or the Jefferson County Department of Health that the proposed facility meets all requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agencies, a letter stating that fact from these agencies must be provided.
- I. **Veterinarian Clinic.** In the following districts: AG, MU-H, MU-D, C-2, I-1, I-2 AND PRD a veterinarian clinic shall be permitted provided that the following conditions are met:
1. Outdoor exercise yards shall be permitted provided that they are completely fenced and used only between 7a.m. and 7p.m., when a staff person of the clinic is present in the exercise yard. Where such outdoor activities abut a dwelling zone district or district permitting dwelling use, a 50-foot setback is required.
 2. Boarding of animals either undergoing medical treatment or not are permitted as an accessory use subject to the following conditions.
 - a. Accessory animal boarding shall occur within completely enclosed structures.
 - b. No more than thirty percent of the gross floor area of the veterinary clinic may be used as a boarding facility.
 - c. No outdoor kennels or runs are permitted.
 - d. No part of any building or structure in which animals are housed shall be closer than 50 feet from any existing residence located on an adjacent parcel.
 - e. All on-site waste shall be housed either within the boarding facility or an accessory structure, and all waste shall be disposed of in a sanitary fashion no less frequently than one time per week. The drainage of all liquid by-products from the kennel shall be discharged into a permitted sanitary sewer line or septic tank and shall not be disposed of by way of storm sewers, creeks, streams, or rivers.

SECTION 4. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 4: Land Use Development Standards; Article III: Uses Permitted by Special Exception (SE); Section 5: Medical use special exceptions, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Section 5. Medical use special exceptions.

- A. **Hospital.** In the MU-M district, a special exception may be granted by the Board provided that the following conditions are met:
1. When a hospital abuts a dwelling district, screening in the form of a landscape buffer yard shall be applied per Chapter 6, Article III of this Ordinance.

2. When a hospital structure abuts a dwelling district there shall be a minimum setback of 50 feet.
 3. A traffic impact study may be required that demonstrates adequate traffic controls are provided as determined by the Traffic Engineer for the City.
- B. **Medical Lab.** In the MU-M and C-1 districts, a special exception may be granted by the Board provided that the following conditions are met:
1. Medical Labs in the MU-M and C-1 shall be limited to 7,500 square feet.
- C. **Scientific Lab.** In the MU-H, MU-D and C-2 districts, a special exception may be granted by the Board provided that the following conditions are met:
1. No smoke, dust or vibration shall be detectable at the property line.
 2. No scientific lab shall be permitted that is required by ADEM to have a permit for release of any kind.
 3. When adjacent to a dwelling district, a landscape buffer yard is required per Chapter 6, Article III of this Ordinance and the scientific lab shall be set back from the property line no less than 50 feet.

SECTION 5. That the provisions of this Ordinance are hereby declared to be severable. If any of these sections, provisions, sentences, clauses phrases, or parts are held to be unconstitutional or void, the remainder shall continue in full force and effect.

SECTION 6. That this Ordinance shall become effective upon publication as required by statute.



City of Birmingham Permitting
205 - 254 - 2904
<https://www.birminghamal.gov/pep>

City of Birmingham Zoning
205 - 254 - 2478
<https://www.birminghamal.gov/pep>

City of Birmingham Department of Innovation & Economic Opportunity (IEO)
205 - 254 - 2799
<https://ieo.birminghamal.gov/>

City of Birmingham Community Development Department (Neighborhood Association Information)
205 - 297 - 8192
<https://www.birminghamal.gov/community-development/community-resource-services-division/>

Birmingham City Council
205 - 254 - 2294
<https://www.birminghamcitycouncil.org/>

City of Birmingham Department of Finance – Tax and License Office
205 - 254 - 2198
<https://www.birminghamal.gov/about/city-directory/finance/newbusiness/>

Alabama Medical Cannabis Commission
<https://amcc.alabama.gov>

12.2.4 - , Dothan, AL 36301

ORDINANCE NO. 2022-290

AUTHORIZING THE OPERATION OF MEDICAL CANNABIS DISPENSING SITES

WHEREAS, in the 2021 Legislative Session, the State of Alabama Legislature passed Act No. 21-450 legalizing and creating a regulatory framework for medical cannabis; and,

WHEREAS, the Alabama Legislature made the following findings of fact:

1. "Medical research indicates that the administration of medical cannabis can successfully treat various medical conditions and alleviate the symptoms of various medical conditions."
2. "There are residents in Alabama suffering from a number of medical conditions whose symptoms could be alleviated by the administration of medical cannabis products if used in a controlled setting under supervision of a physician licensed in this state."
3. "Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments."

WHEREAS, this act requires the governing body of any municipality to authorize by ordinance the operation of the dispensing sites within the corporate limits of the municipality; and,

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

WHEREAS, the City of Dothan wishes to authorize the operation of medical cannabis dispensing sites within the corporate limits of the City of Dothan to assure its citizens can benefit from the medical and economic benefits of medical cannabis.

NOW, THEREFORE, BE IT ORDAINED by the Board of Commissioners of the City of Dothan, Alabama, as follows:

Section 1. In accordance with Alabama Code § 20-2A-51, a holder of a license granted by the State of Alabama pursuant to Act 21-450 is hereby authorized to operate a medical cannabis dispensing site within the corporate limits of the City of Dothan subject to the provisions of Act 21-450 and any relevant provisions of the code of the City of Dothan.

Ord. No. 2022-290, authorizing the operation of medical cannabis dispensing sites, continued.

Section 2. That this ordinance and the rules, regulations, provisions, requirements, orders and matters established and adopted hereby shall take effect and be in full force and effect from and after the date of its final passage and adoption.

PASSED, ADOPTED, AND APPROVED ON SEPTEMBER 20, 2022.

ATTEST:

Wendy Shiver
City Clerk

[Signature]
Mayor

[Signature]
Associate Commissioner District 1

[Signature]
Associate Commissioner District 2

[Signature]
Associate Commissioner District 3

[Signature]
Associate Commissioner District 4


[Signature]
Associate Commissioner District 5

[Signature]
Associate Commissioner District 6
BOARD OF CITY COMMISSIONERS

I hereby certify that the above Ordinance was published in THE DOTHAN EAGLE, a newspaper of general circulation in the City of Dothan, Alabama, on September 23, 2022.

Wendy Shiver
Wendy Shiver
City Clerk

12.2.5 - Tuscaloosa, AL 35404

APPROVED AS TO FORM

Office of the City Attorney

Prepared By: SBH/cr
Requested: Admin Committee Date: 8/16/22
Council Presentation on: 8/23/22
Suspension of Rules: No

ORDINANCE NO. 9259

AN ORDINANCE AUTHORIZING THE OPERATION OF
MEDICAL CANNABIS DISPENSING SITES
(A22-0798)

WHEREAS, in 2021 legislative session the Alabama legislator passed Act No. 21-450 legalizing and creating a regulatory framework for medical cannabis and,

WHEREAS, the Alabama legislator made a number of findings of fact including:

“Medical research indicates that the administration of medical cannabis can successfully treat various medical conditions and alleviate the symptoms of various medical conditions.”

“There are residents in Alabama suffering from a number of medical conditions whose symptoms could be alleviated by the administration of medical cannabis products if used in a controlled setting under supervision of a physician licensed in this state.”

“Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments,”; and

WHEREAS, this act requires the governing body of any municipality by ordinance to authorize the operation of the dispensing sites within the corporate limits of the municipality; and

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

WHEREAS, the City of Tuscaloosa wishes to authorize the operation of medical cannabis dispensing sites within the corporate limits of the City of Tuscaloosa to assure its citizens can benefit from the medical and economic benefits of medical cannabis.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF TUSCALOOSA that, in accordance with Alabama Code § 20-2A-51 a holder of a license granted by the State of

Alabama pursuant to Act 21-450 is hereby authorized to operate a medical cannabis dispensing site within the corporate limits of the City of Tuscaloosa subject to the provisions of Act 21-450 and any relevant provisions of the code of the City of Tuscaloosa.

NOW, THEREFORE, BE IT FURTHER ORDAINED, any business license or sales tax revenue generated by medical cannabis dispensaries authorized by this ordinance shall be deposited to the public safety fund. The funds collected shall not be comingled with other funds of the city.

FUNDING REQUIRED: Yes No

By: _____
Chief Financial Officer

COUNCIL ACTION

Resolution _____
Ordinance _____
Introduced _____
Passed _____
2nd Reading _____
Unanimous _____
Failed _____
Tabled _____
Amended _____
Comments: _____

Adopted 8/30/22
(Ty/H)
(C,B-NO)
[Signature]
City Clerk

Introduced (L-Absent)
8/23/2022
INTRO: (Ty/H - Y, C-NO)
unanimous: FAILED
[Signature]
City Clerk

STATE OF ALABAMA)
TUSCALOOSA COUNTY)

I, Brandy P. Johnson, City Clerk of the City of Tuscaloosa, Alabama, hereby certify that the attached is a full, true, and correct copy of Ordinance No. 9259 duly adopted by the City Council of Tuscaloosa at a regular meeting of said Council held on the 30th day of August, 2022, as the same appears and remains of record in the record book in the Office of City Clerk wherein are recorded the Minutes of Proceedings of said Council.

IN WITNESS WHEREOF, I have hereunto affixed my signature and the official seal of said City of Tuscaloosa this the 31st day of August, 2022.





Brandy P. Johnson, City Clerk

12.2.6 - Decatur, AL 35603

CERTIFICATE

STATE OF ALABAMA)
) CITY OF DECATUR
COUNTIES OF MORGAN AND LIMESTONE)

I, Stephanie Simon, City Clerk of the City of Decatur, Alabama, hereby certify that the attached is a true and correct copy of _____ adopted by the City Council of the City of Decatur, Alabama at a regular meeting held thereof on the 27th day of December, 2022 as the same appears in the records on file in the Office of the City Clerk.

WITNESS my signature as City Clerk under the seal of the City of Decatur, Alabama, this 27th day of December, 2022.



Stephanie Simon
Stephanie Simon
City Clerk

The City Council finds and determines that Verano Alabama, LLC has made a request regarding locating a medical cannabis dispensing site

The City Council further finds and determines that city staff has reviewed the request and that the location requested meets the City's Zoning Ordinance and the adopted Medical Cannabis Ordinance;

THEREFORE, BE IT RESOLVED by the City Council of the City of Decatur, Alabama that the Verano Alabama, LLC request regarding a medical cannabis dispensing site to be located at is hereby approved; subject to approval by the Alabama Medical Cannabis Commission and compliance with its regulations along with the City's requirements.

ORDINANCE NO. 22-4544A

WHEREAS, during the 2021 Regular Session of the Alabama Legislature, **Act 2021-450**, known as the *Darren Wesley 'Ato' Hall Compassion Act*, (the "Act"), was enacted and codified in Title 20, Chapter 2A, *Code of Alabama* 1975, "to create within Alabama a wholly intrastate system for the cultivation, processing, and distribution of medical cannabis in the interest of protecting its own residents from the danger that recreational cannabis poses" (Code of Ala. 1975 § 20-2A-2); and

WHEREAS, the Act legalizes and establishes a comprehensive regulatory framework for medical cannabis, including the licensing and strict regulation of the cultivation, processing, transporting, testing, and dispensing of medical cannabis; and

WHEREAS, the Act specifically finds as follows: "Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments." (Code of Ala. 1975 § 20-2A-2); and

WHEREAS, the Act defines a "dispensary" as an entity licensed by the Alabama Medical Cannabis Commission that is "authorized to dispense and sell medical cannabis at dispensing sites to registered qualified patients and registered caregivers" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act defines an "integrated facility" as an entity licensed "to perform the functions of a cultivator, processor, secure transporter, and dispensary" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act defines a "dispensing site" as a site that is "operated by a dispensary licensee or an integrated facility licensee" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act prohibits a dispensary and an integrated facility from operating a dispensing site within a municipality unless the governing body of that municipality has adopted an ordinance authorizing the operation of dispensing sites within its boundaries (Code of Ala. 1975 §§ 20-2A-51, 20-2A-64, and 20-2A-67); and

WHEREAS, the Act "does not prohibit a municipality from adopting zoning ordinances restricting the operation of dispensing sites within its corporate limits" (Code of Ala. 1975 § 20-2A-51); and

WHEREAS, in accordance with the authority conferred on municipalities under the Act and in order to protect and promote the public health, safety and general welfare, the City Council of the City of Decatur Alabama desires to authorize the operation of dispensing sites for state-licensed dispensaries and integrated facilities within the corporate limits of the City of Decatur, Alabama.

12.3 Evidence of Community Support

12.3.1 - AL 36049



12.3.2 - , Montgomery, AL 36110



Steven L. Reed
Mayor

City Council Members
Charles W. Jwright - President
Cornelius "CC" Calhoun - Pres. Pro Tem
Ed Grimes
Brantley W. Lyons
Marche Johnson
Audrey Graham
Oronde S. Mitchell
Clay McInnis
Glen O. Pruitt Jr.

November 2, 2022

Trevor Seyller
Verano Alabama, LLC
415 N. Dearborn St., 4th Floor
Chicago, IL 60654

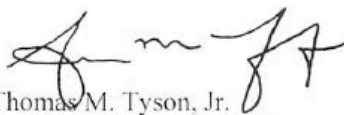
RE:

Dear Sir or Madam:

This is to advise you that the properties located at _____ is in a B-5 (Commercial) Zoning District, which will permit a medical cannabis dispensary.

The City is providing this information solely as a courtesy and the person requesting such information should independently confirm the information contained, herein. The City assumes no liability or responsibility for any misstatements or inaccuracies contained. If we can be of any further assistance, please do not hesitate to contact me at (334)625-2722.

Sincerely,


Thomas M. Tyson, Jr.
Land Use Control Administrator

/tri

12.3.3 - , Birmingham, AL 35212

CITY OF BIRMINGHAM
Department Of Planning, Engineering & Permits
710 North 20th Street
City Hall | Room 210
Birmingham, Alabama 35203



PUTTING PEOPLE FIRST

RANDALL L. WOODFIN
MAYOR

KATRINA THOMAS
DIRECTOR

13 December 2022

Verano Alabama, LLC
415 N Dearborn St, 4th floor
Chicago, IL 60657

To Whom It May Concern:

The property located at 5113 Messer Airport Hwy is zoned CB-2, Contingency General Business District. Properties to the north, south, and west are also zoned CB-2. Properties to the east are zoned R-3 (Single Family District). The property is located in the Woodlawn Neighborhood and is located in Council District 4. According to the City of Birmingham's Geographic Information System (GIS), the property is not located in a regulated floodplain or Commercial Revitalization/Historic District.

A Medical Cannabis Dispensary is permitted with conditions in this zoning district. The conditions include:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.

The City of Birmingham's Zoning Ordinance is available online at www.birminghamal.gov

12.3.4 - , Dothan, AL 36301



CITY OF DOTHAN

Department of Planning and Development

P. O. BOX 2128 • DOTHAN, ALABAMA 36302 • 334 615 4410 (o) • 334 615 4419 (f)
www.dothan.org

Todd L. McDonald, AICP – Director

December 14, 2022

Trevor Seyller
Varano Alabama LLC
415 N Dearborn St.
4th Floor
Chicago, IL 60654

To Whom It May Concern:

The Planning and Development Department is pleased to report that the subject property is zoned B-2 (Highway Commercial) according to the Official Zoning Map of the City of Dothan, Alabama. Under the B-2 zoning district, medical cannabis dispensaries are permitted by-right.

Preliminary review of the location referenced above indicates that there are no schools, day cares, or childcare facilities within 1,000 feet of this property. However, this is a requirement of state law and is not part of the city ordinance. It is your responsibility to verify that none of these uses exists with 1000 ft. of this property.

- The Property is not in a special, restrictive, or overlay district.
- The Property is not part of a PUD.
- Adjacent properties are zoned B-2.

Should you have any questions, please feel free to contact me. My direct telephone number is 334-615-4412 and my e-mail address is

Sincerely,

~~Kimberly Vann~~
Kimberly Vann
Planning Assistant

cc: File

12.3.5 -

Tuscaloosa, AL 35404



December 19th, 2022

Trevor Seyller
Verano Alabama, LLC
415 N Dearborn St.
4th Floor
Chicago, IL 60654

To Whom It May Concern:

This letter is to verify the above referenced property is located within the corporate limits of the City of Tuscaloosa and is currently zoned MX-3.

Section 24-304 of the Tuscaloosa City Code outlines permitted uses for property zoned MX-3. Retail sales or service is listed as a permitted use for property zoned MX-3. Medical cannabis dispensing sites are considered retail sales or service.

Any and all state or federal guidelines and regulations related to medical cannabis dispensing will have to be followed, and the City of Tuscaloosa does not have any additional zoning restrictions for this use at this time.

Should you have any questions, please do not hesitate to contact the Planning Division of the Office of Urban Development at 205-248-5100.

Sincerely,

A handwritten signature in cursive script that reads 'Jonathan Bowen'.

Jonathan Bowen
Planner



PLANNING

2201 University Blvd. • Tuscaloosa, AL 35401 • Phone 205-248-5110 • Fax 205-349-0136 • City Hall 205-248-5311

TUSCALOOSA.COM

@TuscaloosaCity

12.3.6 , Decatur, AL 35603



December 22, 2022

Verano Alabama, LLC
C/O Trevor Seyller
415 N Dearborn St 4th Floor
Chicago, IL 60654

To Whom It May Concern:

Zoning Verification Letters provide information about and verify the current zoning of a particular piece of property and the types of uses that are allowed in that zoning district.

The purpose of this letter is to confirm that the current zoning of a site located at _____ meets the criteria of the medical cannabis ordinance.

This location is considered approved by the Planning Department.

Regards,

A handwritten signature in blue ink, appearing to read "Lee Terry", is written over a horizontal line.

Lee Terry
Planner III
Planning Department

Planning Department – City of Decatur
308 Cain Street, NE • Post Office Box 488 • Decatur, AL 35602-0488
Phone (256) 341-4720 • Fax (256) 341-4727 • www.DecaturAlabamaUSA.com

12.4 Conclusion

As demonstrated above, the Applicant has successfully obtained all applicable business licenses and authorizations from the local authorities for all five of its dispensing sites. Beyond that, the Applicant also provided copies of letters of support from mayors and community organizations indicating their excitement for and approval of the Applicant's dispensaries. As such, the above documents and narrative far exceed the criteria of Exhibit 12.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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License Type: Integrated Facility

Exhibit 13 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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License Type: Integrated Facility

Introduction

As one of the top three largest publicly traded cannabis companies in the world, the Applicant is one of the largest and most established in the cannabis industry. Since its inception, the Applicant has



been profitable with industry-leading margins. The opportunity to bring an established medical cannabis approach to Alabama will add to the already commanding presence in the south, including operations in Florida.

The Applicant is a local business that was carefully built to unite some of the foremost national experts in the cannabis industry with prominent local professionals and community institutions, all with the mindset toward achieving one singular goal—delivering the most experienced, skillful, and compliant medical cannabis operation in the country to the great state of Alabama. In just the few short months since inception, the Applicant has made great strides toward entrenching itself in the communities of each of its six facilities through various partnerships and outreach initiatives with distinguished local entrepreneurs and renowned organizations. Aside from the local partners and institutional supporters, the Applicant has also successfully assembled a dynamic team that features some of the most knowledgeable and proficient members in the industry. The Applicant’s ownership entity is one of the largest and most experienced cannabis operators in the world, comprising 125+ affiliated retail dispensary licenses, nine affiliated grower licenses, and eleven affiliated processor licenses in some of the most restrictive states in the country. With a stellar reputation of producing and providing artisan medical cannabis products that improve lives and inspire brand loyalty, the Applicant’s ownership entity will provide the Applicant with operational, staffing, and logistical resources to help the Applicant successfully and seamlessly open and operate an Integrated Facility.

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Having recently refinanced a \$350 Million Credit Facility in October 2022 (one of the industry's largest to date at the time), the Applicant's ownership entity and main funder can further provide financial assistance to the Applicant should the Applicant require additional funding (although this is unlikely given the Applicant's access to capital in excess of \$30,000,000 from executed credit facility with the ownership entity).

On an ongoing basis, the Applicant's ownership entity will provide the on-the-ground operational team in Alabama unfettered access to a national network of medical cannabis operational, scientific, research, security, sales, design/construction, finance, marketing, community outreach, and regulatory and legal experts. This includes, but is not limited to, sharing personnel/talent, providing standard operational procedures, implementing staff hiring and training procedures, pooling internal resources for problem solving, and pursuing organic growth opportunities and leveraging the collective size of the greater affiliate network to ensure more economical pricing from vendors and contractors. All day-to-day operations in Alabama will be required to comply with internal standards and protocol, as set jointly and in collaboration between the ownership entity and the Applicant.

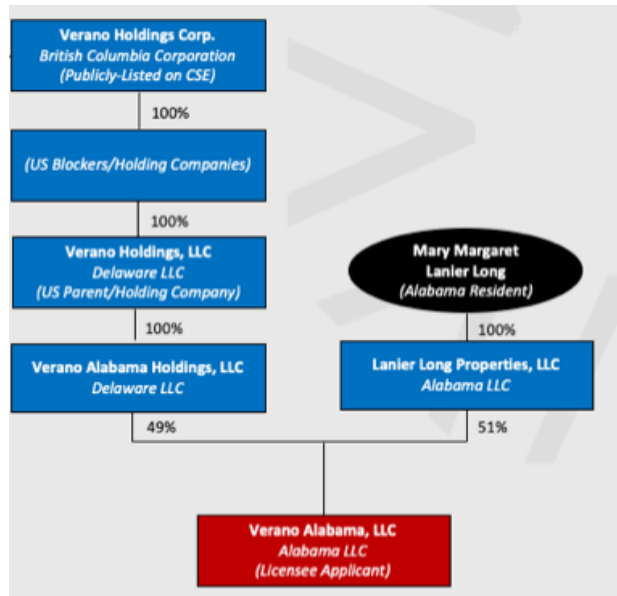
The ownership entity's Compliance Department, which regularly audits each of its affiliate facilities nationwide, will ensure the Applicant's conformity with applicable rules and regulations. Throughout the ownership entity's operational history, they have undergone countless regulatory audits by third parties, state, and local regulators with zero significant violations or disciplinary actions. As part of one of the largest, longest operating, most vetted, and operationally proficient multi-state cannabis conglomerates in the world, the Applicant brings the requisite business experience, operational know-how, and financial discipline needed to successfully operate an Integrated Facility in Alabama, as the team has done time and again across the nation for over six years.

13.1 Business Structure and Plan for Adherence to Corporate Conventions

Business Structure - The entity is structured as a manager-managed Limited Liability Company, which includes majority ownership held by a 15-year continuous Alabama resident with required agricultural experience. The lifelong Alabama resident has 51 years

Confidential –Exempt from Public Disclosure of agricultural experience and holds hemp licenses from the Alabama and Tennessee Departments of Agriculture. The corporate structure is depicted on the right. Additionally, the Applicant has registered the trade name “Zen Leaf” and will operate its dispensaries under this trade name.

License Type: Integrated Facility



Plan for Adherence to Applicable Corporate Conventions

– The Applicant has developed a plan to adhere to all applicable corporate conventions. To this end, the Applicant has filed for and received all formation documents and appropriate licenses, including the Certificate of Formation, Limited Liability Agreement, Federal Employer Identification Number, Certificate of Good Standing, Certificate of Compliance, Trade Name Registration, Alabama Sales Tax licenses, Privilege Tax Licenses for each county of its facilities, and municipal business licenses for each location (a copy of each provided in *Exhibit 11 - Business Formation Documents*). The Applicant has also appointed a Registered Agent of its LLC that is an individual that has agreed to accept legal papers and service of process on the Applicant’s behalf.

The Applicant has filed an initial Business Privilege Tax Return and Annual Report with the Department of Revenue and will do so each year and pay all applicable taxes by their respective deadlines (e.g. on or before three and one-half months after the beginning of the LLC’s taxable year). Since the Applicant will be selling goods, collecting sales tax, and have employees, the Applicant has registered with the Alabama Department of Revenue. As mentioned above, the Applicant has filed for and received local business licenses for each of its facilities and will renew these licenses on an annual basis. Lastly, the Applicant will keep the following records in its principal office and make them available for inspection by LLC members: (1) a current list of the full name and last known address of each member and manager; (2) a copy of the filed articles of organization and all amendments; (3) executed

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copies of any powers of attorney; (4) copies of the LLC's federal, state, and local income tax returns for the three most recent years; (5) copies of any operating agreements including any amendment; and (6) copies of financial statements of the LLC for the three most recent years.

13.2 Business Goals and a 3-Year and 5-Year Plan

The Applicant's business goals fall into five categories: Financial, Patient Outcomes, Employment, Community Impact, and Environmental Sustainability. Each category of the Applicant's business goals is clearly defined below, followed by a 3- and 5-year plan explaining how the Applicant will accomplish such goals.

Financial Goals: By the end of year five, the Applicant's goal is to surpass **\$100M** in annual revenues. Based on this revenue, the Applicant will, at a minimum, generate **\$5.2M** in income tax, **\$8M** in local taxes, **\$10M** in state taxes, and **\$17M** in federal taxes on an annual basis.

Patient Outcome Goals: Patient Outcomes Goals include serving 20% of all registered medical cannabis patients in Alabama by the end of the fifth year. Of those patients, the goal is to have 25% to be considered active patients (i.e. shopping at the Applicant's dispensaries more than once per quarter). Of the reported patient outcomes, the Applicant's goals are set at 95% positive and less than 5% negative. **Employment goals:**

The Employment Goals also include maintaining an employee base that is at least 50% diverse (e.g. comprised of minority groups and veterans) as well as an employee base that is comprised of 75% local residents of the communities of each facility. **Environmental Sustainability goals:** The Applicant's sustainability goals include using 50% of the current industry average for water and energy usage of similar operations; becoming LEED-badge (Leadership in Energy and Environmental Design) certified by year three; and obtain carbon neutrality by the end of year five. **Community Impact Goals:** By the end of year five, the Applicant's goal is to support at least 5 local organizations in each of the Applicant's facilities local communities by allocating up to 10% of its net income and 100 volunteer hours each year for each location.

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The Applicant already possesses the requisite skills, expertise, resources, and capital to promote and execute the aforementioned business goals. These goals will guide the Applicant's vision and set the standards for future decisions. The goals align with the Applicant's mission statement and business philosophy, which focus on providing patients with quality products, access to medicine, and a safe, memorable shopping experience. Below, the Applicant describes how it will achieve these business goals, broken into a 3-year and a 5-year plan for doing so.

13.2.1 3-Year Plan

With **\$30,000,000** committed from the Applicant's ownership entity,

The cultivation/processing building has the infrastructure, including power and water, that will allow the Applicant to commence cultivation operations within 60 days of award. The construction phase has already begun.

Financial Plans –

Similarly, the Applicant's state-of-the-art production processes, honed from other markets, will produce premium products that will attract patients over

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License Type: Integrated Facility

competitors. Likewise, the Applicant’s marketing and advertising plan will allow the Applicant to build reputable brands within the Alabama market, thereby driving sales further. **Patient Outcomes Plans** – Within the first year, the Applicant will begin implementing Angilno by Strainprint Technologies to track and manage patient outcomes. The software is HIPPA, PHIPA, PHIPEDA, and GDPR compliant. The key performance indicators tracked are: **(1)** the Number of Patients Being Served, **(2)** Active Users, **(3)** Positive Reported Outcomes, and **(4)** Negative Reported Outcomes. All five dispensary locations will be opened in year one, thereby allowing the Applicant to increase patient access and capture market share with a first movers advantage, bringing the Applicant closer to achieving its goal of serving 20% of all registered medical cannabis patients in Alabama. During the first three years, the Applicant will also focus heavily on compliant marketing and advertising (as detailed in section 13.8) to assist in achieving the market share goals. The Applicant will also implement feedback from patients to improve reported outcomes, adjusting processes and products as necessary to increase positive reported outcomes. **Employment Plans** – As described above, the increased capacity will also reinforce the Applicant’s need to hire employees. As such, the Applicant will hire locally for its facilities to meet the growing demand. Hiring will be done in partnership with local organizations to identify talent and provide career assistance programs when needed.

Environmental Sustainability - During the first year, the Applicant will have an energy audit performed on each of its facilities and meet with a sustainability consultant to obtain recommendations for reducing energy usage and meeting its goal of becoming LEED-badge certified. LEED is an internationally recognized green building certification program developed by the U.S. Green Building Council (USGBC). Similarly, during the first three years, the Applicant will develop and begin to implement its tree-planting and restoration programs to begin working toward carbon neutrality (more on this in Section 13.10).

Community Impact Plans –The Applicant will continue to identify additional local organizations and initiatives to support, with the plan to be actively supporting at least three organizations within the local community of each of its facilities by the end of the third year. The Applicant will budget up 10% of its net income during each of the first three years,

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including up to 100 volunteer hours a year, to ensure it meets its annual Community Impact Goals.

13.2.2 5-Year Plan

Financial Plans– The Applicant’s plan to increase production capacity and produce a vast array of product types to serve the increasing market size will aid the Applicant in achieving its 5-year financial goal

Patient Outcome Plans – Throughout the first five years, the Applicant plans to continue adopting its operations and product selection to fit the needs of Alabama patients. Products will be refined via patient feedback with the aim of increasing the Positive Reported Outcomes metric to the Applicant’s 5-year goal of 95%. Similarly, the Applicant will refine its marketing and advertising to accommodate the demographic of the Alabama patient population and achieve its goal of capturing and maintaining a 20% market share, while developing programs that aim at increasing repeated customers and achieving the 25% Active User goal.

Employment Plans – the Applicant will achieve its Employment Goals through local hiring initiatives, including partnering with career services organizations and attending career fairs. Also, throughout the first five years, under the direction of the Chief Diversity and Inclusion Officer, and on an annual basis, the Applicant will hire an objective third party to audit the Applicant’s overall diversity and local hiring status and compile an action-focused report detailing specific goals, programs, and metrics. At the time of its license renewal, the Applicant will produce a record of its employee base, setting a collective goal of maintaining at least 50% of a diverse employee base and 75% of employees being residents of the community of each facility.

Environmental sustainability – During the first five years, the Applicant plans to instill a deep sense of environmental responsibility within the culture of its company. This will be accomplished through policies, education, and various incentive programs that encourage and reward employees for eco-friendly behavior. By the fifth year, the Applicant’s restoration and tree-planting program will have reached its full force, and the Applicant

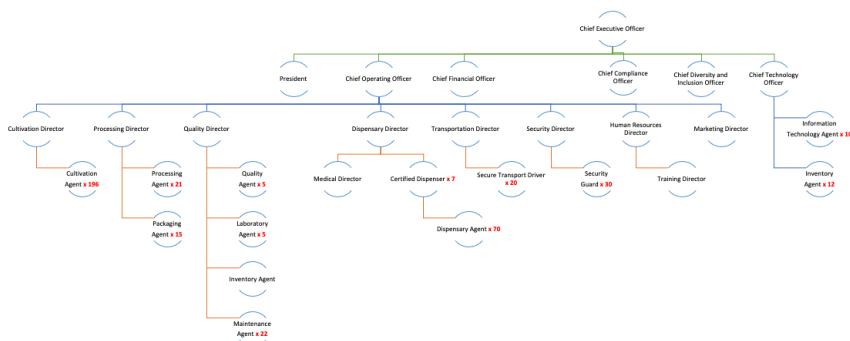
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License Type: Integrated Facility

estimates that this will offset its carbon emissions to allow the Applicant’s company to obtain a carbon neutrality status (more on this in *Section 13.10*). **Community Impact** – In addition to local hiring, the Applicant will continue to work with local organizations and the municipalities to support initiatives that will drive the most positive impact to each community that houses the Applicant’s facilities. The Applicant will build its relationship with the county and municipal governing bodies to identify areas where support is needed most. This relationship and community ties will help the Applicant identify and support at least five local community organizations to support monetarily (up to 10% of net income) and with volunteer hours (100 hours a year per facility), thereby successfully achieving the Applicant’s 5-year community impact plans. By following the 3-year and 5-year plans outlined above, the Applicant is confident in its ability to achieve and exceed its business goals set out at the beginning of this section.

13.3 Organizational Chart

The Applicant’s team consists of industry titans who have played an instrumental role in shaping the development of the cannabis industry. Moreover, as a proud supporter of diversity, equity, and inclusion, the Applicant is pleased to announce that **53%** of the leadership team described below comprises diverse individuals.



The roles, responsibilities, and relationships between individuals within the Applicant’s entity is detailed below in Sections 13.4 and 13.5.

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License Type: Integrated Facility

13.4 Job Descriptions | Managerial Positions

Below are the job descriptions of all managerial positions, showing clear delineation of authority, qualifications, and duties. **C-Level** | The managerial positions mentioned below are filled with individuals with the required qualifications. The **CEO** reports to the shareholders and ultimately retains responsibility for the Applicant's performance, including compliance, safety, strategy, and profitability while executing the vision and mission of the company. The CEO maintains authority over all C-Level positions. Ten-plus years in cannabis operations are required with a bachelor's degree or higher in business. Duties include setting broad goals for performance and growth and evaluating performance by analyzing and interpreting data and metrics. The **Chief Operating Officer** reports to the CEO and retains responsibility for strategic decision-making, policy development, and implementation for all business units. This individual will work collaboratively with the division leads and manage to develop and implement strategic plans focused on the growth and development of operational programs. Ten-plus years in cannabis operations are required with a bachelor's degree or higher in Supply Chain Management. Duties include accountability for the operation's performance (construction, environmental impact, marketing, sales, insurance, bonds, facilities, service, quality, and finances) of all business units. The COO will ensure compliance with all state, federal, and regulatory agencies. The **Chief Financial Officer** reports to the CEO and retains accountability for the company's administrative, financial, and risk management operations. Ten-plus years in financial operations are required with a bachelor's degree or higher in finance. Duties include tax compliance, financial reporting, the development of a financial and operational strategy, metrics tied to that strategy, and the ongoing development and monitoring of control systems designed to preserve company assets and report accurate financial results. The **Chief Technology Officer** reports to the CEO and holds responsibility for leading and overseeing all technical aspects of the company. This position requires a bachelor's degree or higher in technology or computer science with strong operational and technical leadership skills and hands-on experience with cannabis cultivation, processing, and dispensing technologies. Duties include oversight of information technology strategy while implementing policies and goals for the IT department. The CTO ensures analytic platforms

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provide current and future informational needs for all constituencies across the organization and state regulatory system, including Statewide Seed-to-Sale Tracking System operations. The **Chief Compliance Officer** reports to the CEO and develops and implements regulatory compliance strategies to ensure employees, processes, and facilities remain compliant inclusive of the Policies and Procedures Manual and Standard Operating Plan and Procedures management. Five-plus years in cannabis compliance operations are required with a bachelor's degree or higher in regulated industries. Duties include working with state, local, and federal governments to remain compliant, including zoning, inspections, auditing of tracking systems, labeling/ packaging, onsite audits, and renewal of operational licenses. The **Chief Diversity and Inclusion Officer** reports to the CEO and is responsible for guiding efforts to conceptualize, define, assess, nurture, and cultivate diversity and inclusion as an institutional and educational resource. Five-plus years in DEI are required with a bachelor's degree or higher in human resources. Duties include affirmative action/equal employment opportunity regarding the constituent needs of minorities, women, veterans, disabled, and other bounded social identity groups. In addition, management of the community impact plan, initiatives, and implementation. The **Chief Agricultural Officer** reports to the CEO and advises cultivation facility improvements, including propagation, vegetation, and storage of cannabinoid-based products. Ten-plus years in commercial agriculture are required with a bachelor's degree or higher in Agriculture or Horticulture. Duties include ensuring company cultivation policies remain upheld, and company-provided standard operating procedures are followed. The **Chief Strategy Officer** retains responsibility for analyzing business and system processes, competitive dynamics, market share changes, organization capabilities, and strategic risks. Additionally, the CSO will forge new working relationships and synergies with State cannabis vendors. Five years in cannabis and investment operations are required with a bachelor's degree or higher in Regulated Industries. Duties include evaluating the overall business portfolio and ensuring initiatives at all levels align with the company's standards.

Director-Level | The **President** reports to the CEO and oversees the business operations while ensuring the Applicant has effective operational procedures in place. Ten-plus years in cannabis operations are required with a bachelor's degree or higher in Business. Duties

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include spearheading strategies to steer the Applicant’s future in a positive direction, driving operating capabilities to surpass patient satisfaction and retention, controlling costs and introducing tactical initiatives to address negative patient outcomes. The **Cultivation Director** reports to the COO and retains accountability for cultivation operation’s performance and compliance. Responsible for supervising and managing the daily cultivation operations including selecting plant nutrients, implementing dynamic integrated pest management (IPM), maintaining production documents, scheduling all cultivation staff, interviewing potential agents, recording product receipts, making plant media decisions, as well as working directly with local and state government regulators, auditors, and law enforcement agents with inspection visits and information requests. Ten-plus years in cannabis operations are required with a bachelor’s degree or higher in agriculture. Duties include supervising all phases of cultivation operations, including regulatory compliance with state law regarding production, quality control, maintenance, receiving, and shipping. The **Processing Director** reports to the COO and retains oversight of the extraction laboratory, and operates, maintains, and troubleshoots all processing and infusion equipment. The Processing Director manages extraction techniques, formulations, dosing, and processing compliance. Ten-plus years in cannabis processing operations are required with a bachelor’s degree or higher in chemistry. Duties include the oversight of product weighing, packaging, labeling, and documentation of all products. Ensures the quality of products while coordinating internal and external testing and manages retention sampling. The **Transportation Director** reports to the COO and manages, directs, and executes the supply chain program, including manifest creation, tracking systems, and staffing. Five-plus years in cannabis transport operations are required with a bachelor’s degree or higher in logistics with an active CDL license. Duties include the management of all logistics of product transport, vehicle insurance, CDL compliance, third-party Secure Transporters, security of transports, and all product in transport. The **Dispensary Director** reports to the COO while working collaboratively with members of various dispensary teams to drive revenue. Creates and maintains effective SOPs and KPIs to ensure operational, procedural, and performance compliance for dispensary locations. Five-plus years in cannabis retail operations are required with a bachelor’s degree or higher in business. Duties include Statewide Seed-to-Sale Tracking System management (patient registry), store compliance,

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coaching, supporting, and inspiring team members of the dispensing operations. The **Medical Director** reports to the Dispensary Director and retains responsibility for defining and implementing the performance improvement program and patient outcome measurement system in collaboration with the quality improvement department, ensuring the quality of care and measurable program effectiveness for patients' medical care, safety, and comfort. Four-plus years of medical experience are required with a bachelor's degree or higher in medicine. Duties include business and market development, medical research and planning, coordination with medical professionals, and hiring and directing the day-to-day activities of medical staff. **Certified Dispensers** report to the Dispensary Director and are responsible for managing dispensary employees and have undergone training and certification as required by the Commission. A certified dispenser must have at least two years of education or experience in biology, biochemistry, chemistry, physiology, pharmacology, medicine, medical cannabis, nursing, pharmaceuticals, or a similar field. Duties and responsibilities include the requirements outlined in **Rule 583-x-8-.03**. The **Security Director** reports to the COO and manages day-to-day security business operations while maintaining the security program inclusive of security plans and procedures outlined in **Rule 538-x-3-.05** and **538-x-4-.07**. Five plus years in cannabis security operations are required with a bachelor's degree or higher in a security related field. Duties include managing security systems and local security contracts to ensure compliance and safety protocols are followed for all cannabis products within the supply chain. The **Human Resources Director** reports to the COO and manages all HR practices, including performance management, employee engagement and development, inclusion and diversity, and talent development initiatives. The Human Resources Director manages the roster of all leaders and employees. Five-plus years in administrative HR operations are required with a bachelor's degree or higher in human resources. Duties include hiring, new hire orientation, staffing, compensation, wellness and benefits, training, continued education, employee handbook management, development, and team relations. The **Quality Director** reports to the COO and directs processes and product testing to ensure quality standards are met during production – both in the cultivation and processing stages. Ensures procedures are implemented to maintain compliance with the quality systems requirements defined by the quality system manual. Five-plus years in cannabis quality operations are required with a

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bachelor's degree or higher in chemistry. Duties include planning and directing quality assurance policies, programs, and initiatives, including complaints, investigations, recalls, remediation, and product testing compliance. The **Marketing Director** reports to the COO and retains responsibility for all activities related to conceptualizing and implementing the *Marketing and Advertising Plan* compliant with Commission and federal regulations, inclusive of public relations. Ten-plus years in marketing or advertising are required with a bachelor's degree or higher in marketing or advertising. Duties include business and market development, market research and planning, packaging and labeling compliance, strategic direction for promotion and advertising, coordination with sales, and hiring and directing the day-to-day activities of marketing staff. Responsible for advertising and marketing compliance. The **Training Director** reports to the Human Resource Director and retains accountability for providing direction and leadership in the planning, development, and execution of the company's training strategy. Five-plus years in cannabis training is required with a bachelor's degree or higher in a training related field. Duties include analyzing the business needs from a training and cannabinoid therapy perspective, identifying gaps and recommending training and operations solutions. Training all personnel on regulations, compliance, job duties, and patient outcomes.

13.5 Job Descriptions | Non-Managerial Positions

Below are the Applicant's job descriptions of all non-managerial employee positions, showing a clear delineation of qualifications and duties. **Cultivation Division | Cultivation Agents** report to the Cultivation Director and monitor and maintain plant production and health. They maintain organization, cleanliness, and efficiency of production areas. Responsible for compliance with **Ala. Admin. R. 80-14-1, et seq.** Cultivation Agents manage all protocols for preventing pests employing techniques for identifying, managing, and eliminating pests. Five-plus years in cannabis operations are required with a bachelor's degree or higher in horticulture or botany. Duties include daily plant care within all plant life cycles, including nutrient management, pruning, harvesting, and trimming while performing plant tracking in accordance with regulations and company standards also scouting, eradication, logging, tracking, and preventative maintenance of pest and pathogens.

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Processing Division | Processing Agents report to the Processing Director and assists with facilitating processing operations, including operations of processing equipment and devices, while aiding in the creation of batch production records and labels following standards. Five-plus years in cannabis processing operations are required with a bachelor's degree or higher in chemistry. Duties include assisting with the weighing, packaging, labeling, and documentation of all products, as well as tracking batch numbers, lot numbers, expiration dates, and other relative duties of processing cannabis. **Packaging Agents** report to the Processing Director and support packaging operations. Two-plus years of professional experience are required, and a bachelor's degree or higher in logistics preferred. Duties include tracking, prepping, cleaning, labeling, wrapping, and operating production and packaging machinery. **Laboratory Agents** report to the Quality Director and is responsible for assisting in product testing, processing, and formulation. Five plus years of professional cannabis laboratory experience are required with a bachelor's degree or higher in chemistry. Duties include compliance with **Chapter 10** and performing qualitative and quantitative chemical and microbiological analysis methods.

Transportation Division | Secure Transport Drivers report to the Transportation Director and are responsible for safely delivering products, cash, and valuables to and from production facilities and dispensaries. Five-plus years in cannabis transport operations and a bachelor's degree or higher in logistics or related field are required with an active CDL license. Duties include compliance with **Chapter 7**, enforcement of rules to protect the shipment of cannabis, products, and cash, as well as the safety of personnel involved in the transportation, freight, and receiving of high-value assets.

Dispensary Division | Dispensary Agents assist the dispensary management team in all operational aspects of running the dispensary and ensuring each patient receives outstanding service by providing a positive and friendly environment. Dispensary Agents will assist patients and caregivers with their personal needs, maintaining solid product knowledge and always providing the highest level of customer service. Four-plus years of professional experience are required, and a bachelor's degree or higher in business is preferred. Duties include compliance with **Chapter 8**, dispensing medical cannabis,

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inventory tracking compliance, sanitation, auditing, and product explanation. Recommend, select, and help locate the right products for patients depending on their needs and information contained in the Physician Certification. Dispensary Agents are responsible for greeting customers promptly, keeping organized patient records, and helping patient schedules flow smoothly. Duties also include facilitating new membership and patient renewal processes compliant with **Chapter 2**, including data entry.

Operations Division | Quality Agents report to the Quality Director and retain responsibility for assisting with quality-related activities at the facility associated with incoming inspection, start-up verification, in-process verifications & checks, and sampling and inspection of finished products. Two-plus years of quality systems experience are required with a bachelor's degree or higher in quality systems management. Quality Agents will also assist in identifying potential quality risks and working with operations personnel to develop improvement opportunities. **Security Guards** report to the Security Director and ensure company facilities, employees, patients, and products follow established procedures and policies. Two-plus years of professional experience are required, and a bachelor's degree or higher in a security related field is preferred. Duties include conducting security checks, viewing security monitors, and reporting significant problems to authorities, state regulators, and company leaders assigned as the first point of contact. The Security Guard will also complete scheduled security reports and assist company personnel with special needs. **Inventory Agents** report to the CTO and are responsible for data input, quality, and audits. Two-plus years in cannabis inventory operations are required with a bachelor's degree or higher in a Logistics related field. Duties include compiling and verifying inventory records to confirm product compliance requirements are met while maintaining compliance within BioTrack/Metric systems to formulate, implement and enforce proper techniques and reporting. **Information Technology Agents** reports to the CTO and support day-to-day IT business needs such as troubleshooting laptops, desktops, printers, tablets, conference rooms, and operational software. Two-plus years in information technology operations are required with a bachelor's degree or higher in information technology. Duties include installing hardware onsite, working as part of a support team for a product launch, or as a tester for a new IT service. **Maintenance Agents** report to the Quality Director and ensure

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that facilities are maintained in a satisfactory condition. Two-plus years of maintenance experience required with a bachelor's degree or higher preferred. Duties include upkeep of facilities such as trash removal, cleaning, sanitization, plumbing, electrical, carpentry, and HVAC.

Advisors | Advisory Board Chairman reports to the CEO, serves as a communication liaison between the Advisory Board and the officers of the company. He appoints subcommittees, attends board meetings, and participates in organizational events. Two-plus years in cannabis operations are required, with a bachelor's degree or higher in Regulated Industries. Responsibilities include submitting a quarterly leadership report to advise the company and board on initiatives planned for the company and outline a detailed execution strategy. The **Pharmaceutical Advisor** reports to the Advisory Board Chairman and works collaboratively with the products team providing best practices. Ten-plus years of pharmaceutical experience are required with a bachelor's degree or higher in quality systems management. Duties include attendance of Medical Advisory Board meetings and discuss innovations in supply chain compliance based on FDA pharmaceutical standards. The **Financial Advisor** reports to the Advisory Board Chairman and provides reporting and financial tracking advice. Ten-plus years of financial experience are required with a bachelor's degree or higher in Finance. Duties include attendance of Advisory Board meetings to report innovations in tax compliance and financial systems. The **M&A Advisor** reports to the Advisory Board Chairman and provides mergers and acquisition prospects and advice. Ten-plus years of M&A experience are required with a bachelor's degree or higher in accounting, finance, or a related field. Duties include attendance of Advisory Board meetings to report mergers and acquisition activity and prospective companies to acquire. The **Cultivation Advisor** reports to the Advisory Board Chairman and provides agricultural and horticultural advice. Ten-plus years of cannabis experience are required with a bachelor's degree or higher in horticulture, or a related field. Duties include attendance of Advisory Board meetings to report innovations in cannabis cultivation equipment and techniques. The **Cannabinoid Research Advisor** reports to the Advisory Board Chairman and provides cannabinoid research advice. Ten-plus years of cannabis research experience are required with a bachelor's degree or higher in a research related field. Duties include

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attendance of Advisory Board meetings to report cannabinoid research from scholarly journals that could alter products and propose research and development initiatives.

13.6 Executive Summary

The Applicant intends to obtain a vertically integrated license within the Alabama market, focusing on patient outcomes, environmental responsibility, community impact, and research.

The Applicant's ownership entity (i.e. a publicly traded cannabis corporation) has substantial cash reserves for this project, and a **\$30M** revolving line of credit has secured the startup capital required to move quickly and sponsor all expenses for the first three years. Although the capital expenditures are vast, the infrastructure and foundation laid today will pay incredible dividends in the future. Once the infrastructure has been implemented, scaling the operations is expeditiously accomplished based on the projected needs of the market. By bringing best-in-class operators to the Alabama market for training and starting operations, the Applicant can effectively deploy human and financial resources. Through a proposed joint venture,

to establish a shared cannabinoid research initiative focused on minor cannabinoid development, long term cannabinoid storage degradation, and cannabinoid analytic testing research. In addition, the Applicant intends to make monetary donations for the cannabinoid internship program sponsoring coursework, educational supplies, and textbooks (as described further in the Community Engagement Plan).

13.6.1 Mission Statement

With a mission to address vital health and wellness needs, the Applicant produces a comprehensive suite of premium, innovative medical cannabis products sold under its trusted portfolio of consumer brands. Above all, patient outcomes, supported by scientific research, drive the heart of the company.

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13.6.2 Leadership Background and Qualifications

Owner & Chief Agricultural Officer - The Owner & Chief Agricultural Officer, a lifelong Alabama resident, has farmed her entire adult life. With over 52 years of total commercial horticulture experience, she has extensive experience in farming. Crops include corn, seed cotton, soybeans, wheat, and industrial hemp. She obtained her industrial hemp license from the Alabama Department of Agriculture in 2020, which is still in good standing. At 16, she was declared an adult by the State of Alabama following the tragic death of her parents. She petitioned the state for adulthood to farm the land and apply for loans for farming equipment for the land she still farms today. She was certified by the Alabama Department of Agriculture as a Private Applicator through the Alabama A&M extensions program coordinated by Sanja B Thomas, Ph.D. She has successfully started and exited numerous Alabama businesses including real estate, landscaping, and horticulture. **Chief Executive Officer** – The CEO has led one of the largest cannabis companies in the world from infancy through Initial Public Offering (OTCMKTS: VRNOF). With a market capitalization exceeding \$2.7B, a global workforce surpassing 4,000 employees, and expansion into 17 states, his superior leadership has driven the business’s growth and success, catapulting it to the second-highest revenue-generating cannabis company worldwide in 2021. The CEO earned his B.S. in Communication and Philosophy from Loyola University, a top-tier Chicago institution. His diligence, perseverance, and tireless work ethic have made him one of the cannabis industry’s most successful entrepreneurs. His business acumen is also well-established outside the cannabis field. He owns and operates six well-known restaurants, which have received multiple awards in the restaurant and food service industry. Due in part to his versatility, he has established himself as a nationally renowned entrepreneur. **Chief Operating Officer** – The COO leverages his years of regulatory and corporate experience to bring professionalism and efficiency across the company. The COO currently sits on the Executive Committee, and Board of the Maryland Wholesale Medical Cannabis Trade Association was named to the Baltimore Business Journal’s 40 Under 40 List, was awarded the 2016 Innovator of the Year prize, and is identified as a 2017 People to Know in the Law. He received his bachelor’s degree magna cum laude from Washington University in St. Louis and his Juris Doctorate cum laude from George Mason University School of Law. **Chief**

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Financial Officer – Prior to joining the Applicant, he held leadership positions of increasing responsibility across multiple information technology, manufacturing, and CPG companies. He spent ten years at General Motors in Financial Planning and Analysis, Controller, and CFO positions in the U.S., European, and Asian markets. Most recently, he served as Vice President, Head of Supply Chain Finance, and CFO of The Kraft Heinz Company's U.S. Operations. The CFO holds an MBA from the Ross School of Business at the University of Michigan and a master's and two bachelor's degrees in Engineering and Computer Science from Michigan State University. He is also a CPA. **Chief Technology Officer** – The CTO is a seasoned technology, digital, e-commerce, and retail executive. His responsibilities include enterprise systems, infrastructure, software development, and data engineering. He implemented SAP FICO successfully in Sep 2022 and IT general controls for the Sarbanes-Oxley Act of 2002 (SOX) for Applicant operations. His experience includes serving as Chief Information and E-commerce Officer at Charlotte's Web (one of the largest CBD companies worldwide), leading the company's technology transformation. **Chief Strategy Officer** – The Chief Strategy Officer currently serves as Chief Investment Officer of a publicly traded cannabis company, and over the course of his more than 19 years of financial and capital markets experience, he has served in leadership roles across a variety of Fortune 500 companies and industries. He graduated from Central Michigan University with a Bachelor of Science degree in Economics and obtained his Master of Science in Finance from Walsh College. **Chief Compliance Officer** – The Chief Compliance Officer has ten years of cannabis experience and oversees Legal, Regulatory Compliance, and Government Affairs for one of the world's largest publicly traded cannabis companies. He commands a staff of 25 retaining ultimate responsibility for 201 licenses under the Applicant umbrella. He received his Bachelor of Arts in History and Psychology from the University of Illinois, Urbana-Champaign, his Juris Doctor cum laude from Chicago-Kent College of Law, and a Master of Laws in Health Law and Policy from Loyola University Chicago School of Law. **Chief Diversity and Inclusion Officer** – The CDIO is the Chief People Officer at a publicly traded cannabis company. In this role, she is responsible for leading the Applicant's overall people strategy, which includes workforce planning; talent management; learning and development; diversity, equity, and inclusion; acquisitions, integration, and overall employee engagement to support the future growth of the company. She has over 20 years

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of human resources experience in professional and financial services firms. She received her B.A. in English Literature at Purdue University.

13.6.3 Business Style and Philosophy

The Applicant's business style includes three pillars: people, process, and product.

1) **People** are the lifeblood of the operation; their entrepreneurial spirit will lift the organization to new heights. The Applicant intends to foster a company of culture inclusive of diversity, inclusion, and equity. The critical metric for people includes tenure and overall employee happiness. The Applicant encourages all employees to be cannabis advocates while educating the pros and cons of the industry. 2) **Process** is an instrument of success; the operator's mindset deploys stringent standard operating procedures for efficiency. All patient-driven processes employ extensive research and development to make products more effective. Over the last decade of operations, the Applicant can leverage leading-edge patented products utilizing production automation proven in seventeen markets. 3) **Products** are led by proprietary genetics. The premium flower and unique strains provide the Applicant with an unmatched advantage. The genetics that have shown positive outcomes in patients in other markets are utilized to help patients of Alabama. The Applicant possesses a consumer-packaged goods (CPG) brand offering modeled after the largest companies in the world. Product offerings in Alabama and other markets include all product types to give patients the largest arsenal to combat ailments.

13.6.4 Key Personnel

President – The President has served the Applicant since 2014, and instrumental in the management and ongoing success of MÜV's 115,000 square foot processing and cultivation facility in Ruskin, FL. Under his leadership the Applicant serves nearly 200,000 patients over 61 dispensary locations throughout Florida. Using both leadership and financial acumen, he built a team of experts that has made MÜV™ one of the most respected Medical Marijuana Treatment Centers in Florida. Product development has received multiple patents for the award-winning MÜV Products line providing quality, consistency, and reliability. Due to MÜV's unmatched innovative and proprietary formulas, companies in more than 12 other

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states and 5 foreign countries sell MÜV product formulations.

Cultivation Director – The Cultivation Director manages the cultivation operations in seventeen locations encompassing 1 million square feet of production space. His responsibilities include designing, implementing, and managing cultivation procedures, IPM programs, facility design, nutrient programs, training, breeding, tissue culture, research, and development. He was instrumental in developing a transdermal cannabis patch in collaboration with the University of South Florida.

Dispensary Director – The Dispensary Director leads, directs, and supports retail operations of 12+ locations managing over 120 employees. Before joining the Applicant, he was the Manager of Dispensary Operations and Delivery Hubs for Curaleaf. He led dispensary operations from admissions, patient consultations, cash management, product dispensing, auditing, reporting, and inventory management.

Medical Director, RPh – The Medical Director is a registered pharmacist with over 25 years of medication dispensing experience in multiple practice settings. She now devotes her career entirely to improving lives naturally with medical cannabis. The Medical Director has served as Clinical Director of the Applicant's affiliate Zen Leaf™ dispensaries in Maryland since opening in 2017 where she oversees the care of patients across multiple dispensary locations. Given her in depth knowledge and hands-on experience both in the medical cannabis industry and the retail pharmacy industry, she is ideally situated to serve as the Applicant's Medical Director.

Human Resources Director – The Human Resources Director is responsible for overseeing corporate HR functions such as payroll, benefits, and workers comp, as well as HR functions for integrating new acquisitions. She was born and raised in South Africa and moved to the US in 2002

Training Director
– The Training Director is a cannabis expert and plays an essential role in employee development, educational compliance, and creating training collateral across audio, video, and other mediums. Beyond cannabis, he has an additional seven years of direct training and

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education experience in manufacturing, retail, and food service environments.

Security Director – The Security Director has extensive experience developing and implementing security solutions in 100 plus cannabis retail and cultivation/ processing locations across the U.S. Before entering the cannabis industry, he held the position of Supervisory Special Agent/Attorney with the United States Department of Justice, Drug Enforcement Administration (DEA) for 30 years.

Quality Director – The Quality Director is the Executive Vice President of the Applicant and a co-founder of CTPharma, a biotech company with clinical stage and discovery assets derived from cannabis. He is the Management Representative for ISO 9001:2008/ISO 13485:2003 system and is responsible for the Quality Manual, the quality policy, quality objectives, and quarterly management review meetings.

Marketing

Director – The Marketing Director is a seasoned and versatile marketer, adept in strategic planning, brand building, marketing communications, and media relations. He brings nearly a decade of advertising experience to the Applicant, ensuring that all marketing and communication initiatives are executed and implemented on-brand across retail and wholesale markets where affiliates operate.

Secure Transport Driver 1 has a Class A CDL and was a Heavy Equipment Operator and Combat Engineer

. **Secure Transport Driver 2** also has an active CDL and has driven commercially since 1999.

Certified Dispensers | Certified Dispenser 1 is an Alabama local pharmacist that lives within forty-five minutes of proposed dispensary site one. Certified Dispenser 1 was awarded the illustrious Five-Year Service Award from U-Save Pharmacy for his dedicated work.

(15) Certified Dispenser 2 is an Alabama local pharmacist that lives within sixty minutes of proposed dispensary site two. She is a life-long Alabama resident and

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pharmacy career began in high school during a pharmacology course where she shadowed community pharmacists.

through simple counseling on over-the-counter products and medication packaging to ease compliance issues. Her continuous goal as a pharmacist is to strive for excellence in her work to deliver the best outcomes for patients. **(16) Certified Dispenser 3** is an Alabama local pharmacist that lives within thirty minutes of proposed dispensary site three. She has over 25 years of dispensing medications and working in a retail pharmacy setting.

(17) Certified Dispenser 4 is an Alabama local pharmacist that lives within thirty minutes of proposed dispensary site four.

(18) Certified Dispenser 5, an Alabama local pharmacist lives within seventy-five minutes of proposed dispensary site five. She has over 12 years of pharmacy experience, including managerial roles and general retail oversight.

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13.6.5 Identification of Facility Location(s) and Function(s).

Cultivation/Processing Facility – The Applicant’s cultivation and processing facility is located at **Luverne, AL 36049**. The functions that will occur at this facility include: corporate administration; cultivation; processing; packaging and labeling; in-house testing; waste destruction; cannabis and medical cannabis storage; Secure Transportation; and the sale or transfer of medical cannabis to dispensaries. In other words, the functions that will occur at the Applicant’s facility located at **Luverne, AL 36049** are all of the authorized actions for licensed cultivators, processors, transporters, and testing laboratories (e.g. in-house testing). **Dispensing Sites** – On the other hand, the Applicant has secured the following five dispensing sites:

The Applicant will perform all permitted functions for dispensary licensees at its dispensing sites, as outlined in **Chapter 8** of the Commission’s Rules. Restricted functions comply with **Rule 538-x-8-.02-05**. The duties and requirements of these dispensing facilities comply with **Rule 538-x-8-.02-06**.

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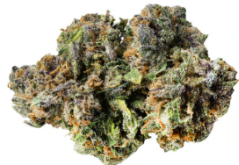
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13.7 Description of Services

As described below, the Applicant will fully utilize its license authorization and the number of its permitted facilities by offering the following services and products, in accordance with **Rule 538-x-3-.11-3.h**. In each section of the services and products below, the Applicant describes: (a) pricing data, if applicable; (b) product lifespan, if applicable; (c) projected benefits to consumers; (d) patents; and (e) proprietary technology.

13.7.1 Cultivation Services and Products

In regard to the services or products related to cultivation, the Applicant will, in accordance with **§20-2A-62(a)(1)**, conduct the following: (a) The cultivation of cannabis; (b) The sale or transfer of cannabis to a processor; and (c) If the Applicant contracts with a processor to process its cannabis into medical cannabis on the Applicant’s behalf, the sale or transfer of medical cannabis to a dispensary. The Applicant will use proprietary technology for cultivation including genetics, lighting, cultivation processes, nutrient mixtures, and internal software. All cultivation activities will occur at the Applicant’s cultivation facility located at _____, Luverne, AL 36049. The Applicant will cultivate and offer for sale to Processors and Integrated Facilities (for processing) the following strains:



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13.7.2 Processing Services and Products

Using documented good quality practices and meeting current Good Manufacturing Practices, the Applicant will process cannabis produced by its internal cultivation operations as well as from a cultivator into approved medical cannabis products, pursuant to **Rule 538-x-6-.04-1**. Put differently, the Applicant will, in accordance with **§20-2A-63(a)(1)**, offer the following services related to its processing operations: (a) The purchase or transfer of cannabis from a cultivator; (b) The processing of cannabis into medical cannabis, which shall

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include properly packaging and labeling medical cannabis products, in accordance with **§20-2A-63(d)** and **Rule 538-x-6-.05**; and (c) The sale or transfer of medical cannabis to a dispensary. All processing services and products will occur at the Applicant's cultivation/processing facility located at Luverne, AL 36049.

Since the Applicant plans to fully utilize the full authorization of its license, the Applicant will produce every type of medical cannabis product permitted in Alabama, as described in **§20-2A-3(14)**. More specifically, the Applicant will produce, using proprietary technologies and proven methods tested in various medical cannabis markets, the following medical cannabis products: (1) Tinctures; (2) Oral tablets; (3) Capsules; (4) Non-sugarcoated Lozenges; (5) Topical Balms; (6) Topical Cream; (7) Topical Gels; (8) Topical bath soaks; (9) Suppositories; (10) Transdermal Patches; (11) Nebulizers; and (12) Liquid or oil for administration using an inhaler. The Applicant's ownership entity already produces these products in medical cannabis markets, several of which have won awards for superior quality and satisfaction. The Applicant will produce, package, and label all medical cannabis products in compliance with the requirements outlined in **Rules 538-x-6-.04, 538-x-6-.05, and §20-2A-62**.

Below is a description of the medical cannabis products that the Applicant will produce, including benefits and pricing based on the Applicant's data collected from its operations in 17 U.S. States.

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13.7.3 Testing Services

The Applicant will perform in-house testing of cannabis and medical cannabis products, including retention sample testing. While this service will be for internal purposes only (i.e. the Applicant will not test any other licensees cannabis or medical cannabis), the benefits of this service includes quality assurance and identifying issues early in the production process. By doing so, the Applicant can deploy changes to ensure the quality of products before they move through the supply chain. There is no pricing affiliated with the Applicant's in-house testing services.

13.7.4 Transportation Services

In addition to the secured transportation of the Applicant's own medical cannabis, the Applicant will offer as a service to transport cannabis and medical cannabis of other licensees in compliance with Chapter 7 of the Commission's rules. More specifically, the Applicant will

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use its Secured Transport Vehicles to transport cannabis and medical cannabis, in a safe, efficient and professional manner from and to licensees' facilities, pursuant to such contracts as the Applicant may negotiate between itself and one or more licensees, in accordance with **Rule 538-x-7-.02-3.a.**

The benefit of the Applicant's transportation services for licensees include secured, reliable transport, timely deliveries, and transportation in a moisture- and temperature-controlled environment acceptable to the contracting licensee, to avoid deterioration or loss of efficacy of the cargo.

13.7.5 Dispensing Services and Products

At all five of the Applicant's dispensing sites (all of which have been secured by the Applicant and approved by the local governing bodies), the Applicant will sell state-tested medical cannabis products to patients and caregivers. More specifically, pursuant to **Rule 538-x-8-.02-4.**, the Applicant's dispensing services and products will include: (a) The purchase and transfer of medical cannabis from a processor; (b) If a cultivator contracts with a processor to process its cannabis into medical cannabis on the cultivator's behalf, the purchase or transfer of medical cannabis from the cultivator; (c) The purchase and transfer of medical cannabis from an integrated facility; and (d) The dispensing and sale of medical cannabis only 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. The Applicant will sell the medical cannabis products produced from its own processing operations and will also sell products obtained from other licensees. In fact, the Applicant has already established business relationships and supply agreements for its dispensing sites with several other prospective licensees

The Applicant will continue to build such relationships with suppliers in Alabama as the market matures.

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Lifespan of Medical Cannabis – Having dispensed over a billion grams of medical cannabis, the Applicant has compiled product stability data over the last decade to provide the following lifespan data. In short, the lifespan for all medical cannabis products will not exceed 12-months, as will be indicated by the expiration date on the labels and verified through stability testing. **Benefits to Consumers** – The benefit of each medical cannabis product type (oral tablets, transdermal patches, lozenges, etc.) that the Applicant will sell was meticulously detailed above in *Section 13.7.2*. Additional benefits of the Applicant’s dispensing services include increased patient access, since the Applicant strategically chose its dispensing sites to provide the most access to as many Alabama medical cannabis patients as possible. Beyond the direct benefits to consumers of the medical cannabis products themselves, the Applicant will also benefit consumers by offering discounts to veterans and qualified social equity individuals. Additional benefits from the Applicant’s dispensaries will include product variety, quality, competitive pricing, educational resources, presentations, and patient take-home literature. By expanding the Applicant’s product offering to include other licensees’ products, the Applicant also benefits patients by providing a wider spectrum of therapies to treat various qualifying medical conditions, as described in **§20-2A-3(21)**.

13.8 Advertising/Marketing Analysis and Strategy

To effectively advertise and market to the Alabama medical patient population, the Applicant has conducted a thorough analysis of the market. The results from such an analysis were

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used as the foundation of the Applicant’s strategy for advertising and marketing in Alabama, as discussed below.

13.8.1 Advertising/Marketing Analysis

First, the Applicant started by analyzing the market for qualifying medical conditions in Alabama, such as those described in **§20-2A-3(21)**. As part of the analysis, the Applicant also collected data related to Alabama patient demographics, patterns of use, successes/failures of treatment, and more. Given the large similarities and crossover between the Florida and Alabama medical cannabis program and patient demographics, ethnicity, income, and overall market, the Applicant also cross-referenced data collected from the Florida market (as reported by Rosenthal et al. 2021) as a comparison for its analysis.

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In addition to the external market analysis, the Applicant also conducted an internal analysis to determine the best advertising and marketing strategy for the Alabama market. Below are the findings from the Applicant's SWOT analysis: **Strengths** – The Applicant has access to incredible human and financial resources in over 17 operating states with more than 4,000 employees. Having built and operated successfully integrated facilities worldwide, experience, talent, and strategy are key strengths. Brands, workflows, operating procedures, and protocols are utilized and perfected in other similar markets. **Weaknesses** – A new market poses complexities in operations, compliance, human and financial capital needs. **Opportunities** – Since Alabama has not yet introduced medical cannabis to the market, there are incredible opportunities to expand the product offering in a clinical sense. The results from the external analysis indicate that the Applicant can tailor its marketing and advertising to address the needs, personalities, and demographics of the Alabama market (as described below in *Section 13.8.2*). **Threats** –Outside competitors threaten the garnering of market share. To combat this threat, the Applicant must run efficient and scalable operations and continue to bring new and innovative products to the market that are unique, effective, and safe. All of this will be supported by the advertising and marketing strategy outlined below.

13.8.2 Advertising/ Marketing Strategy

The Applicant's advertising and marketing strategy, including branding, product selection and pricing, are based on the results of its analysis of the Alabama market.

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Prior to the launch of advertisements or marketing campaigns, the Applicant will seek preapproval pursuant to **Rule 538-x-4-.17-1**. Through **538-x-4-.17-4**. All placement of campaigns will adhere to **Rule 538-x-4-.17-5**. Complying with the restrictions of **Rule 538-x-4-.17-6**. The Applicant will provide a marketing and advertising plan in compliance with **Rule 538-x-9-.03-3.k**. and

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intends to provide the Commission with examples of any specific advertisements. All web presence will comply with **Rule 538-x-4-.17-7.**, while advertising and marketing in general will comply with the restrictions outlined in **Rule 538-x-4-.17-8.** And the **Act §20-2A-61.**

13.9 Community Engagement Plan

The following Community Engagement Plan describes all efforts that have been and will be made to foster the Applicant's relationship with, involvement in the cities of Luverne, Montgomery, Birmingham, Dothan, Tuscaloosa, and Decatur, and commitment to any community (including municipality or county) in which the Applicant intends to locate a facility within the next three years. In fact, the Applicant has already secured one cultivation/processing facility and five dispensing sites (described in Section 13.6.5). Additionally, the Applicant has already begun taking actions to positively impact the community (city and county) of each of its facilities, as evidenced by the letters of intent and support between the Applicant and various community organizations (within the original submission,

In short, up to **10% of profits** will be earmarked for local donations to the organizations and initiatives mentioned above for each community of each of the Applicant's facilities. Total community impact is estimated at \$250,000-\$1,000,000 annually. Additionally, the Applicant will provide full-time employees up to two (2) paid days off per year to volunteer for local organizations and toward supporting community initiatives. The Applicant anticipates **volunteering a minimum of 100 hours** during each of the first three years of operations and expects that number to increase annually as staff numbers increase. In addition to county and city support, the Applicant will support the following statewide initiatives: **Education** – While the Applicant believes in the therapeutic benefits that cannabis provides, it also recognizes the potential harm and risks associated with consuming cannabis at an early age. For this reason, the Applicant intends on hosting monthly community meetings for parents and their teens/children to educate them on the potential harms of cannabis use. Educating teens/children at an early age will hopefully prevent them

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from developing any cannabis abuse problems. **Drug Abuse** – The Applicant intends to donate to the drug abuse centers, such as the Aletheia House which offers residential/inpatient treatment and outpatient services in Birmingham, AL. **Veteran Causes** – The Applicant will collaborate with the *Alabama Department of Veterans Affairs (ADVA)*, to develop an internship program aimed at providing veterans employment opportunities in the cannabis industry.

(c) **Diversity and**

Inclusion – At least 50% of the students selected for the internship program will be those of minority heritage; (d) **Intellectual Property** – All research will be shared by both the Applicant and Tuskegee with the goal of publishing in scholarly journals; and (e) **Research Location** – The Applicant will serve as an ISO-certified laboratory location inclusive of the analytic equipment, processes, and procedures (absent of federal funds) to aid in student development. Beyond the community engagement plans outlined above, the Applicant will continuously work with local organizations and the local governing body to identify areas of support that would benefit the communities the most.

13.10 Environment Impact Statement

The following Environmental Impact Statement outlines the anticipated impact of each of the Applicant’s proposed operations, per facility, on the local environment (13.10.1); the Applicant’s efforts and plans to foster cooperation and compliance with agencies providing environmental oversight (13.10.2); and steps the Applicant has and will take to eliminate its

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carbon footprint (13.10.3) and maintain a positive environmental profile in each community (13.10.4).

13.10.1 Anticipated Impact of each of the Applicant's Operations, per Facility

Cultivation and Processing Operation – The Applicant anticipates that its cultivation and processing operation's two largest impacts on the environment are energy and water usage. The facility will consume lower than average power and water based on average cannabis facility size due to the Applicant's innovative consumption reduction strategies. Beyond energy and water consumption, the other anticipated impacts of the Applicant's cultivation/processing facility include: (1) Pesticide misuse; (2) local habitat impacts; (3) waste management issues; and (4) air quality impacts. **Dispensing Operations** – Retail locations will have minimal impact on the environment.

The Applicant provides countermeasures to reduce its carbon footprint and environmental impact of its operations, per facility, below in Section 13.10.3. But first, the Applicant will describe its plans for fostering a cooperative relationship with environmental agencies at the federal, state, and local level.

13.10.2 Fostering Cooperation with Federal, State, and Local Agencies

To foster cooperation and compliance with federal, state, and local agencies providing environmental oversight, the Applicant has designated its Chief Compliance Officer to serve as its Environmental Impact Liaison. This liaison will serve as the direct line of communication between the Applicant and all agencies providing environmental oversight, including, but not limited to, **federal** (U.S. Environmental Protection Agency, Department of Energy, U.S. Department of Agriculture, Department of Interior, and more); **state** (Alabama Department of Environmental Management); and **local** (Crenshaw County Health Department, Montgomery County Environmental Health Division, Jefferson County Environmental Services, Houston County Environmental Health Department, Tuscaloosa County Public Works Department, and Morgan County Environmental Services). The

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Applicant will cooperate with the EPA to work with federal, state and local partners to monitor and ensure compliance with clean water laws (i.e. Clean Water Act), clean air laws (i.e. Clean Air Act), and regulations related to the use or disposal of chemical substances (i.e. Toxic Substances Control Act). At the State level, the Applicant will cooperate and collaborate with the Alabama Department of Environmental Management (ADEM) to ensure compliance with Alabama environmental laws, including but not limited to solid waste management in the State (via the Solid Wastes Disposal Act).

The Applicant will also comply with all local ordinances related to sewage and other environmental standards. The Environmental Impact Liaison will maintain an active relationship with these environmental oversight agencies, publishing monthly reports to the public and these agencies describing the Applicant's operations impact on the environment for each of its facilities, measures taken to reduce its carbon footprint, and efforts made to maintain a positive environmental profile in each community of each of all six of its facilities.

13.10.3 Reducing Carbon Footprint

Section 13.10.3 outlines how the Applicant will reduce its carbon footprint, starting with actions already taken and then describing plans for the future.

13.10.3.1 What Has Been Done to Reduce Carbon Footprint

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13.10.3.2 What Will be Done to Reduce Carbon Footprint

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13.10.3.2.1 Cultivation/Processing Facility

13.10.3.2.2 Dispensing Sites

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13.10.4 Maintaining a positive environmental profile in each community

13.11 Insurance Plan

The Applicant's insurance plan includes insurance for casualty, workers' compensation, liability, and auto/fleet policy, in compliance with **Rule 538-x-3-.05-3.m.(15)(k)** and **§20-2A-53(a)(2)**, as exemplified by the declaration's pages from A-rated insurers below.

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13.12 Conclusion

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In conclusion, the Applicant intends to exceed all Commission requirements while providing the most comprehensive care to optimize positive patient outcomes. Accomplishing this goal involves the dedication of a world-class team uniquely qualified to execute on this plan. Financial stability and operational excellence are a couple of the most compelling reasons but the soul of the company's "why", involves a compelling need to help. Patient care sits at the top of the company's "why" and drives all decisions from goal setting, company structure, employment, marketing, advertising, environmental sustainability, and insurance.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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Exhibit 14 – Evidence of Business Relationship with Other Licensees and Prospective Licensees

Verification

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

James A. Leventis

Printed Name of Verifying Individual

Chief Compliance Officer

Title of Verifying Individual

James A. Leventis

Signature of Verifying Individual

3/3/2023

Verification Date

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Summary

The Applicant has already established significant business relationships with other licensees and prospective licensees, as evidenced by the attached contracts, contingent contracts, or memoranda of understanding. More specifically, the Applicant has established business relationships with the following:

- Cultivators:

- Processors

- Secure Transporters

- Dispensaries

- Integrated Facilities

- State Testing Laboratories

Below are copies of all contracts, contingent contracts, or memoranda of understanding between the Applicant and the prospective licensees listed above. Additionally, the Applicant also provides exemplars of agreements it may use in the future with other licensees (see Section 14.8). By drafting the actual contracts at this stage, the Applicant can move expeditiously to solidify proposed relationships with the prospective licensees that are awarded licenses.

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14.1 Contracts with Cultivators

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14.2 Contracts with Processors

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License Type: Integrated Facility

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License Type: Integrated Facility

14.3 Contracts with Secure Transporters

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14.4 Contracts with Dispensaries

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14.5 Contracts with Integrated Facilities

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14.6 Contracts with State Testing Laboratories

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14.7 Exemplars of Contracts

14.7.1 Processing Services on behalf of Cultivators

The Applicant intends to provide processing services to licensed Cultivators. All processing of cannabis into medical cannabis, packaging, storage, and transport of medical cannabis follows the duties and restrictions outlined in **Chapter-5-Regulation-of-Cultivators, Chapter-6-Regulation-of-Processors, Chapter-7-Regulation-of-Secure-Transporters, and Chapter-9-Regulation-of-Integrated-Facilities.**

The following contract outlines the terms of service the Applicant will provide. Within the cannabis industry this service is known as toll processing.

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14.7.2 Wholesale Supply Agreement

The following contract will govern wholesale purchases or sales from the Applicant to the Licensee. This contract will work for the following purposes:

1. The sale and purchase of cannabis products with Cultivators
2. The sale and purchase of cannabis and medical cannabis products with Processors
3. The sale and purchase of medical cannabis products with Integrated Facilities
4. The sale of medical cannabis products to Dispensaries

All purchases and sales of cannabis and medical cannabis follow the duties and restrictions outlined in **Chapter-9-Regulation-of-Integrated-Facilities**.

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14.7.3 Secure Transporter Contract as Service Provider

As an integrated facility providing secure transporter services the following duties and restrictions shall be followed:

Duties:

1. To transport cannabis and medical cannabis, in a safe, efficient, and professional manner from and to licensees' facilities, pursuant to such contracts as the Secure Transporter may negotiate between itself and one or more licensees.
2. To log details regarding the product and the transport in the Statewide Seed-To-Sale Tracking System and/or the manifest relating to said transport.
3. During transit, to maintain cannabis and medical cannabis, the Applicant will perform transports in accordance with an approved security plan and make all deliveries in a moisture- and temperature-controlled environment acceptable to the contracting licensee, to avoid deterioration or loss of efficacy of the cargo.

Restrictions:

As a secure transporter the Applicant will not:

1. Perform the functions of a State Testing Laboratory.
2. Make home delivery of cannabis or medical cannabis to anyone.
3. Transport patients or caregivers to or from dispensing sites or any other licensees' facilities.
4. Transport any cargo except cannabis, medical cannabis and associated products, materials, packages, or containers.

All transports follow the duties and restrictions outlined in **Chapter-7-Regulation-of-Secure-Transporters** and **Chapter-9-Regulation-of-Integrated-Facilities**.

The following contract will govern secure transporter services the Applicant intends to provide to Licensees. This contract will work for the following purposes:

1. The transport of cannabis or medical cannabis products on behalf of Cultivators
2. The transport of cannabis or medical cannabis products on behalf of Processors

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3. The transport of cannabis or medical cannabis products on behalf of Integrated Facilities
4. The transport of medical cannabis products on behalf of Dispensaries

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14.7.4 Secure Transporter Contract as Client of Service Provider

The following contract will govern secure transporter services the Applicant intends to contract with 3rd party secure transport licensees. This contract will work for the following purposes:

1. The transport of cannabis or medical cannabis products with Cultivators
2. The transport of cannabis or medical cannabis products with Processors
3. The transport of cannabis or medical cannabis products with Integrated Facilities
4. The transport of medical cannabis products with Dispensaries

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14.7.5 State Testing Laboratory Agreement

If a licensed State Testing Laboratory does not have a vendor contract to provide services to the Applicant, the following contract shall be utilized. All testing follows the duties and restrictions outlined in **Chapter-10-Regulation-of-State-Testing-Laboratories**.

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14.8 Conclusion

As shown above, the Applicant has already established significant business relationships with prospective licensees of every type available. The Applicant will continue to establish business relationships with other licenses and support a cohesive and fair medical cannabis market in Alabama. Thus, the Applicant’s business relationships shown above, in addition to the exemplars of agreements provided, far exceed the required criteria of Exhibit 14.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
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Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
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Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
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Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 15 – 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.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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15.1 Introduction

To track all aspects of patient and caregiver qualifications, including receiving and coordinating information and certification from registered certifying physicians, the Applicant will use the **Alabama Medical Cannabis Patient Registry** as well as (interfaced with the Statewide Seed-To-Sale Tracking System - METRC), in accordance with **§20-2A-34(a)(1)**. This combination of technology will allow the Applicant to conduct the following: (1) Receive and record physician certifications; (2) Receive and track qualified patient registration and issuance of medical cannabis cards; (3) Receive and track designated caregiver registration and issuance of medical cannabis cards; (4) Verify that a medical cannabis card is current and valid and has not been suspended, revoked, or denied; (5) Track purchases of medical cannabis at dispensaries by date, time, amount, and type; (6) Determine whether a particular sale of medical cannabis transaction exceeds the permissible limit; and (7) Track medical cannabis cards that are denied, revoked, or suspended.

will seamlessly interface with the METRC and the patient registry to allow the Applicant to easily receive and coordinate information for each qualified patient and caregiver, including: (a) the name of the qualified patient and the patient's designated caregiver, if applicable; (b) the patient's registered certifying physician; (c) the respective qualifying medical condition or conditions; (d) the recommended daily dosage and type of medical cannabis; and (e) any other information the Commission deems relevant. This industry leading, proven, all-in-one cannabis technology system will notify the Certified Dispenser if the sale of medical cannabis is compliant with the certifying physicians' recommendations and the limits thereof.

The Applicant acknowledges that before medical cannabis may be dispensed to, possessed by, or administered to a prospective patient and, if applicable, the prospective patient's caregiver, the patient and caregiver, must be placed on the patient registry established by the Commission in accordance with the Act and the Rules, pursuant to **Rule 538-x-2-.03-1**. Thus, the first step in coordinating information and certifications with physicians is to verify that the incoming patient or caregiver has an active registration in the patient registry. Thereafter, the Applicant's Certified Dispenser will use the patient registry, if available, and

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to coordinate information with the physicians regarding the patient or caregiver's medical cannabis purchases and limits. All individuals who as part of their duties to licensees, must interact with the patient registry, the AMCC website, or the Statewide Seed-to-Sale Tracking System, will undergo pre- commencement IT certification for each database with which they must interact, demonstrating their proficiency in respect to those databases. IT certification as set forth herein shall be administered by the third-party IT provider, or another, as the Commission may designate, pursuant to **Rule 538-x-4-.05-5**.

15.2 Verifying a Valid and Active Medical Cannabis Card

The Applicant will only sell medical cannabis to a patient or caregiver with a valid and active medical cannabis card, which may be tangible or virtual, demonstrating certification by a registered certifying physician pursuant to the Act and the Commission rules, in accordance with **Rule 538-x-2-.07-1** and **538-x-2-.09-5**. Thus, upon entry into the dispensing site and before purchasing medical cannabis, the Applicant will require that patients and caregivers must provide to a Dispensary Agent their medical cannabis card as well as additional photo or other approved identification, in accordance with **Rule 538-x-2-.07-3. & 4**. The Dispensary Agent will prohibit from entering the dispensing site any persons, including children or guests of patients or caregivers, who are unable to provide a medical cannabis card matching a valid patient registry profile, or who are unable to provide, upon request, additional identification to the satisfaction of dispensing site personnel, pursuant to **Rule 538-x-2-.07-5** and **§20-2A-64(d)(7)**. The Applicant will have one of the most advanced and sought-after ID verification technology packages available, built on the best ID Scanners for dispensaries in the industry.



Once the identification has been verified, the Dispensary Agent will then verify that the identification number on the medical cannabis card is identical to the identification number included in the patient or caregiver's profile in the patient registry, in accordance with **Rule 538-x-2-.07-6**. The Dispensary Agent will check the patient registry to ensure the patient or

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caregiver has an active registration or determine if a registered certifying physician has deactivated a current certification or declined to issue a new certification for medical cannabis under any of the circumstances described in **Rule 540X-25-.10-(7)**. The Dispensary Agent will also review the medical cannabis card and patient registry information to determine if the patient is classified as an adult or minor (under 19 years of age), pursuant to **Rule 538-x-2-.03-3. & 4., 538-x-2-.07-2., and §20-2A-30(a & b)**. The Applicant acknowledges that such minor patient may use medical cannabis obtained by a caregiver on behalf of the minor patient, but the minor patient may not purchase or possess medical cannabis. Once verified, the Dispensary Agent will allow the patient or caregiver to enter the dispensing site.

15.3 Purchase of Medical Cannabis by Patients and Caregivers

The Applicant will always have a Certified Dispenser on duty while the dispensing site is open for business; and the Certified Dispenser will oversee and sign off on all sales of medical cannabis as the dispensary employee ultimately responsible for each transaction, pursuant to **Rule 583-x-8-.03-1. and §20-2A-64(d)(5)**. Prior to dispensing medical cannabis, the Applicant's Certified Dispenser (or Dispensary Agent supervised by a Certified Dispenser) will use the patient registry to confirm that: (1) the patient or caregiver holds a valid, current, unexpired, and unrevoked medical cannabis card; (2) the patient or caregiver holds a valid, current, and unexpired identification; (3) the dispensing of medical cannabis conforms to the type and amount recommended in the physician certification; and (4) that the amount recommended will not exceed the 60-day daily dosage purchasing limit, in accordance with **Rule 583-x-8-.03-5., 538-x-2-.07-7., and §20-2A-64(d)(7)**.



In accordance with **Rule 583-x-8-.03-6.**, at the time of dispensing medical cannabis, the Certified Dispenser (or Dispensary Agent supervised by a Certified Dispenser) will enter into

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the patient registry and (interfaced with the METRC), and will also attach to the package containing the medical cannabis the following patient-specific information: (a) The name and medical cannabis card number of the patient; (b) The name and medical cannabis card number of the caregiver, if applicable; (c) The name and contact information of the registered certifying physician; (d) The amount and type of medical cannabis being dispensed; (e) The physician's dosing comments and maximum daily dosage recommendation; and (f) The date and time the medical cannabis was dispensed.

15.3.1 Coordinating Daily Dosages

Dosages of medical cannabis purchased by a patient or caregiver shall be limited to the lower of the maximum daily dosage recommended for the patient by the licensed certifying physician, or the maximum daily dosage permitted by law under the Act and the Rule, pursuant to **Rule 538-x-2-.07-9.** and **540-X-25-.11-(2).** A registered certifying physician does not prescribe medical cannabis but merely sets a recommended form of intake (i.e., oral tablet, capsule, tincture, inhaler, lotion, etc.) and THC content, up to a maximum daily dosage of medical cannabis for the patient based on the patient's diagnosis, qualifying medical condition, age, size, and other individual factors. Such determinations as to form and THC content to be recommended shall be exclusively the province of the registered certifying physician, up to the maximum daily dosage allowed by law, pursuant to **Rule 538-x-2-.07-8.** As to all patients, regardless of the form of administration or the patient's condition or individual factors, the initial maximum daily dosage recommended by the registered certifying physician may be lower than, but shall not exceed, 50 mg of delta-9 THC. However, the Applicant acknowledges that a registered certifying physician may increase the maximum daily dosage but will still be subject to the maximum daily dosages established by the criteria listed in **Rule 538-x-2-.07-9.b. – d.** and **540-X-25-.11-(3).** The Applicant acknowledges that a registered certifying physician may not lawfully recommend the use of medical cannabis with a potency greater than three percent (3%) tetrahydrocannabinol to any minor for any qualifying medical condition, pursuant to **Rule Rules 538-x-2-.07-9.e.** and **540-X-25-.11-(1).** The Applicant is also aware that a caregiver of a minor who holds a medical cannabis card may not legally possess medical cannabis with a potency greater than three percent (3%) tetrahydrocannabinol, unless the caregiver holds a medical cannabis

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card based on their own qualifying medical condition or holds a caregiver medical cannabis card on behalf of a patient who is not a minor, pursuant to **Rule 538-x-2-.07-9.e**. Thus, the Applicant's Certified Dispenser will use the patient registry and _____ to ensure that: (1) patients and caregivers do not purchase medical cannabis that exceeds their maximum daily dosage; and (2) minor patients or their caregiver, as applicable, do not receive medical cannabis that exceeds 3% in tetrahydrocannabinol.

15.3.2 Coordinating Purchase Limits

In accordance with **Rule 538-x-2-.07-10.**, the Certified Dispenser (or Dispensary Agent supervised by a Certified Dispenser) will use _____ and the patient registry to ensure that the number of daily doses of medical cannabis being sold to a patient or caregiver at one time shall be limited to the lesser of: (1) a 60-day supply; (2) the number of doses equal to the number of days since the patient's or caregiver's last purchase of medical cannabis; or (3) as recommended by the registered certifying physician. Similarly, the Applicant will ensure patients or caregivers do not renew their medical cannabis supply more than 10 days before the 60-day period expires as well as ensuring that at no time a registered qualified patient or registered caregiver possesses more than 70 daily dosages of medical cannabis, pursuant to **§20-2A-30(d)**. _____ will notify the Certified Dispenser if the above purchase limits would be exceeded by any sale to a patient or caregiver.

15.4 Conclusion

As shown above, the Applicant's plan for receiving and coordinating information and certifications from registered certifying physicians meticulously addresses and exceeds all requirements of Exhibit 15. The Applicant will use the patient registry and _____ to verify medical cannabis cards are active and valid, track purchases of medical cannabis, coordinate purchase limits, and more. As an added layer of assurance, the Applicant will verify identification of patients and caregivers using state-of-the-art ID scanners and monitor patient registrations in the patient registry for practices that could facilitate unlawful diversion or misuse of cannabis and shall report to the Commission such findings, pursuant to **§20-2A-34(c)**.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
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Exhibit 16 – Point-of-Sale Responsibilities

Verification

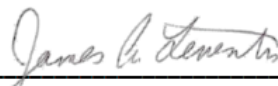
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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16.1 Introduction

The Applicant's plan regarding its point-of-sale responsibilities involves the Certified Dispenser educating and informing patients and caregivers on a vast array of topics pertaining to medical cannabis, including, but not limited to, instructions for use, potential side effects, proper storage, legal requirements, and more. As will be discussed below, the Certified Dispenser will convey this information to patients and caregivers at the point-of-sale, during private consultations, and through educational materials such as brochures and links to online resources owned and operated by the Applicant, all of which comply with the Act and the Commission's rules. The Applicant has recruited proposed Certified Dispensers, which are licensed Alabama pharmacists, for each dispensing site to handle all patient sensitive communications to go above and beyond Commission requirements.

16.2 Education

The Applicant will train Certified Dispensers to properly educate patients and caregivers on the topics outlined below at the point-of-sale. *Potential Side effects* - The Certified Dispenser will inform patients and caregivers about the adverse impact and cautions regarding medical cannabis use, including the possible cardiovascular and pulmonary adverse side effects; some common adverse side effects, such as disorientation, drowsiness, and paranoia; as well less common but potentially more severe adverse effects, such as psychosis, seizures, and dyspnea. Among other topics, this training includes cautions regarding medical cannabis use while driving or operating heavy machinery. *Potential drug interactions* - If a patient or caregiver requests education regarding potential drug interactions, the Certified Dispenser will educate the patient or caregiver on how cannabinoids interfere with the metabolism of many prescription medications through the cytochrome P450 enzyme system. Potential drug interactions can occur with other drugs, such as tachycardia and hypertension with sympathomimetics, drowsiness and ataxia with central nervous system depressants, and confusion with anticholinergics. The Certified Dispenser will direct patients and caregivers who have questions about their potential drug interactions to their registered certifying physician, who must maintain a documented

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review of the patient's current medication to identify possible drug interactions in accordance with **Rule 540-X-25-10**.

Requirements and Restrictions - At the request of the patient or caregiver, the Certified Dispenser will also educate patients and caregivers on the restrictions the Commission places on patients and caregivers as outlined in **Rule 538-x-2-08**. For instance, patients and caregivers shall: (1) not be able to transfer registrations; (2) not engage in the cultivation of medical cannabis or the manufacture of medical cannabis extract; (3) not provide or accept samples of medical cannabis; (4) purchase medical cannabis only from a certified medical cannabis dispensing site operated by a dispensary or integrated facility licensed by the Commission; and (5) carry their medical cannabis cards with them whenever they are in possession of medical cannabis. The Certified Dispenser will also educate patients and caregivers of the requirements for circumstances necessitating a notice to the Commission, as outlined in **Rule 538-x-2-10**. **Possession Limits** - Upon request of a patient or caregiver, the Certified Dispenser will provide education related to possession limits and restrictions. For example, patients and caregivers shall: (1) possess no more than a 70-day supply of medical cannabis, as then recommended by the patient's registered certifying physician, by or on behalf of a single patient at any time; (2) not possess or administer medical cannabis shall on federal property or in federal buildings; (3) not possess or administer medical cannabis at state or federal correctional detention facilities, including but not limited to prisons and juvenile detention centers; (4) not possess or administer medical cannabis in any public or private place where medical cannabis is prohibited; (5) not possess or administer medical cannabis outside of its packaging on the premises of a dispensing site or any other licensed facility under the Act or these Rules; and (6) not operate a motor vehicle, watercraft, heavy machinery, or aircraft while under the influence of medical cannabis.

Product Information and Availability - The Certified Dispenser will educate patients and caregivers, upon request, on the medical cannabis product types available at the dispensary. Suppose the Certified Dispenser determines that the product the patient or caregiver requests is unavailable at the dispensary. In that case, the Certified Dispenser will inform purchasers of other dispensaries that have the product in its inventory. Such determinations as to form and THC content to be recommended shall be exclusively the province of the

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registered certifying physician, as described in **Rule 538-x-2-.07-9.** and **§20-2A-33(f)(1).** *Laboratory Test Results* - If requested by the patient or caregiver, the Certified Dispenser will provide education on interpreting State Testing Laboratory test results, including details for which contaminants have been tested for, percentages of cannabinoids, types of terpenes, water activity, pests, and if any mold or mildew is present. *Proper storage and handling of medical cannabis* - If a patient or caregiver requests education regarding the appropriate storage and handling of medical cannabis, the Certified Dispenser will inform the patients and caregivers that they must store medical cannabis in a secure location to prevent theft, loss, or access by persons not authorized under the Act and the Commission’s rules, pursuant to **Rule 538-x-2-.08-5.** Similarly, per **Rule 538-x-2-.08-7.,** the Certified Dispenser will inform the patient and caregiver that they must maintain medical cannabis in one of the following containers at all times until administered to, or by, a patient: (a) The original dispensing package with an unaltered dispensary label in accordance with the Act and Commission Rules; or (b) A container for storing medical cannabis provided by a dispensary or integrated facility in accordance with the Act and the Commission. *Substance Abuse* - If requested by a patient or caregiver, the Certified Dispenser will discuss how cannabis can be used as an alternative to addictive drugs such as opioids. The Certified Dispenser will also discuss how some people may develop tolerance to cannabis use (aka “substance dependence”). If a purchaser requests information about opportunities to participate in substance abuse programs, the Certified Dispenser will provide them with detailed educational materials and contact information for affiliated programs. Brochures for these programs will be readily available and prominently displayed in the lobby near the front desk reception.

16.3 Consultation

The Applicant will construct the point-of-sale area to allow for complete privacy between the patient/caregiver and the Certified Dispenser. However, if a patient or caregiver requests a consultation, the Certified Dispenser will provide an in-person consultation at the dispensing site’s private consultation room. The Certified Dispenser will provide each purchaser with individually tailored advice on the topics listed above and instructions for

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the proper and safe use of medical cannabis while ensuring not to address any topics or questions that are prohibited for the Certified Dispenser to advise on.

16.4 Provision of information

The Applicant will develop and maintain educational materials provided free of charge for distribution at each of its dispensing sites, including but not limited to new customer packets, trifold, informational videos, websites, newsletters, and other electronic and web-based resources. Information covered in the educational materials will include: (1) general cannabis education; (2) proper use and administration of medical cannabis; (3) safe storage of medical cannabis; (4) testing processes; (5) basic legal information; (6) clinical studies related to the use of medical cannabis; (7) restrictions on patients and caregivers as described in **Rule 538-x-2-.08**; (8) circumstances requiring notice to the Commission as outlined in **Rule 538-x-2-.10**; (9) preventing unintended consumption; (10) laws and regulations regarding medical cannabis in Alabama; and (11) more. Patients and caregivers can also volunteer to receive periodic emails, texts, or calls with updates on the Alabama medical cannabis program and other information concerning the legal use of medical cannabis. In addition to these illustrated brochures, pamphlets, and websites, informational sheets will be included with every product sold and will provide, at a minimum, the information outlined in **Rule 583-x-8-.03-6**. and instructions for administration, storage, and disposal; any required disclaimers; substance abuse information; and more. Information will be provided in both English and Spanish. Copies of all materials will be available for inspection by the Commission upon request.

16.5 Responses to patient and caregiver questions

Pursuant to **Rule 583-x-8-.03-7**., a Certified Dispenser may, at the request of the patient or caregiver, provide instructions on the proper administration of medical cannabis, education regarding potential side effects, potential drug interactions, or other aspects of medical cannabis. The Certified Dispenser will answer any questions regarding the topics above at the point-of-sale and/or through the provision of information materials. If the patient or

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caregiver would like more privacy, the Applicant has a private consult room at each dispensary site away from the sales area. Notwithstanding the foregoing, the Applicant's Certified Dispenser will not offer advice regarding the safety or effectiveness of medical cannabis, the recommended daily dosage, or type of medical cannabis recommended by the registered certifying physician. Instead, the Certified Dispenser will direct the patient or caregiver back to the registered certifying physician to address questions or provide advice that the Certified Dispenser cannot, pursuant to **Rule 583-x-8-.03-7**.

16.6 Instructions for use regarding all medical cannabis products

The Applicant has developed instructions for using all permissible medical cannabis product types outlined in **§20-2A-3(14)**. At the request of a patient or caregiver, the Certified Dispenser will verbally provide instructions for use at the point-of-sale. Additionally, for each medical cannabis product type, the Applicant has developed brochures that patients and caregivers can take home free of charge that provide step-by-step instructions for the use, storage, disposal, and return of medical cannabis products. Furthermore, the Applicant will establish a phone line that patients and caregivers can call for additional instructions and guidance regarding the use of medical cannabis products. If requested, the Certified Dispenser will also provide patients and caregivers with a chart to record their dosages, dates, type of product, and the effect they receive.

16.7 Conclusion

As demonstrated above, the Applicant has meticulously devised standard operating procedures for its point-of-sale responsibilities to be conducted by the Certified Dispenser. The education, consultation, and provision of information regarding all medical cannabis products to be sold at each dispensing site comply with the Commission's requirements for Certified Dispensers and far exceed the minimum required criteria of Exhibit 16.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
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Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
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Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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Exhibit 17 – Confidentiality of Patient Information

Verification

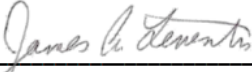
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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License Type: Integrated Facility

17.1 Maintaining Confidential Information

Below is the Applicant's plan for maintaining confidential information and providing cybersecurity for sensitive information with respect to patients and caregivers, including protocols for maintaining the confidentiality of patient information in accordance with HIPAA arising from or related to the dispensary's access to the Patient Registry and/or from any other source, pursuant to **Rule 538-x-3-.05-3.m.(16)(i)** and **Rule 538-x-4-.07-12.o.(9)**. The Applicant's Training Director will train employees on patient confidentiality, including relevant Alabama rules and regulations, relevant HIPAA guidelines, cybersecurity best practices, and the Applicant's SOPs. For instance, employees will be trained to keep diffusers on their computer screens to prevent third parties from observing their screens from the side, which helps preserve patient confidentiality. Employees are also trained to receive and return caregiver and patient ID cards in a face-down position, so that patient names are not visible to nearby individuals. Indeed, the Applicant will ensure that patient records are not visible to anyone other than the qualified patient, their caregiver, and authorized employees. Check-in employees are taught to assign queue numbers to patients and caregivers upon sign-in. This way, when patients are in the waiting room and then called to go back into the dispensing area, they are called by their queue number, as opposed to their actual name, further preserving confidentiality. Dispensary employees are taught to talk in a soft voice when talking with patients and caregivers in the dispensing area and only discuss ailments, treatments, use of products, or other confidential information in a private, consult room. The Applicant's facility is designed to accommodate patient confidentiality by offering ample space for filling out forms and providing information in a discreet manner. Additionally, employees are taught to dispense products in compliant, closed, opaque bags so that the product is not visible to anyone else when the patient leaves the dispensary. Employees will be trained on proper shredding and media destruction to ensure the Applicant remains compliant with privacy laws and provides protection to all parties to avoid a confidential information leak of any records communicated interpersonally, kept physically, or stored virtually. Employees will be trained never to leave sensitive information in the open.

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The Applicant will also require non-disclosure agreements and business associate agreements (BAA) with employees, contract workers, service providers, suppliers, investors, or any third parties with access to confidential or sensitive information, as applicable. These entities must sign the agreements before the Applicant is permitted to share Protected Health Information (PHI) with these entities. A non-disclosure agreement will ensure that individuals do not distribute or disclose secret information or intellectual property. A BAA is a legal document that dictates the safeguards that entities are required to have and mandates that they are responsible for maintaining their HIPAA compliance.

All staff members, including management, are required to complete training related to HIPAA compliance and security. In addition, any employee whose job duties include direct interaction with the patient registry or is otherwise involved with accessing, collecting, or handling patient information is required to complete training on the collection and confidentiality of patient information before starting employment. The Training Director oversees all training on the collection and confidentiality of patient PHI and electronic PHI (ePHI) while also incorporating additional ePHI training from the Applicant's third-party seed-to-sale track system

The Training Director will train the Applicant's employees on using password protection and dual authentication to access the patient registry interfaced with the Statewide Seed-to-Sale Tracking System (METRC). Employees are also trained on the 18 fields of information protected under HIPAA, such as patient name, diagnosis, and social security number, among other fields, as well as any part of an individual's medical record or payment history. Employees are trained not to disclose any protected information without express written authorization from the patient unless the information is being used under one of HIPAA's limited exceptions, such as to facilitate payment. In addition to initial employee training, the Training Director will implement ongoing HIPAA training through screen saver reminders; posters with reminders of what HIPAA data includes pop quizzes on HIPAA data; and other ongoing training to keep patient confidentiality as a top-of-mind concern through the culture of the company. To be HIPAA compliant, the Applicant will document employee training to prove that each employee received the required training on time.

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17.2 Providing Cybersecurity for sensitive information

Electronic Document Management System - Protecting digital data is one of the primary goals of the Applicant's plan for providing cybersecurity for sensitive information concerning patients and caregivers, which is why the Applicant will use a centralized Electronic Database Management System (EDMS) that far exceeds HIPAA's security standards related to IT systems and infrastructure protection.

Similarly, HIPAA's data backup and storage requirements require an entity to create and maintain retrievable copies of its protected documents while allowing the entity to maintain those copies at the same location.

In compliance with **§20-2A-55(e)**, the information in METRC is confidential and is exempt from disclosure under the Open Records Act, Article 3 of Chapter 12 of Title 36. The Applicant prevents access by a person who is not authorized to access METRC or is not authorized to access the information, pursuant to **§20-2A-60(17)**.

Securing and Protecting the System from Outside Intrusion and Hacking - The Applicant will secure its cybersecurity system and IT infrastructure from outside intrusion and hacking with several layers of advanced protection.

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This visibility allows for fast and efficient responses to potential threats. Pursuant to **Rule 538-x-4-.05**, licensees' network security will, at a minimum, comply with cybersecurity standards set by the International Society of Automation (ISA) and the International Electrotechnical Commission (IEC) standard ISA/IEC 62443 applicable to industrial facilities operated by manufacturers of medical or pharmaceutical businesses and take all necessary steps to ensure the confidentiality of the information received, maintained, and uploaded to any of the above databases.

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License Type: Integrated Facility

17.3 Conclusion

The Applicant will always maintain and review at least annually its plans for maintaining the confidentiality of patient information and cybersecurity for sensitive information, as per **Rule 538-x-4-.07-12.o.(9)** and **538-x-3-.05-3.m.(16)(i)**. As shown above, the Applicant has meticulously devised a plan for securing and maintaining confidentiality as to all sensitive information and any records required to be confidentially maintained, including but not limited to information and records communicated interpersonally, kept physically, or stored virtually. The plans, procedures, and protocols described above will ensure patient confidentiality and far exceeds the minimum required criteria of Exhibit 17.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

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detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 18 – Money Handling & Taxes

Verification

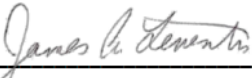
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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License Type: Integrated Facility

18.1 Introduction:

The Applicant will properly handle and manage its money to ensure the success and safety of the business, as well as compliance with all taxes required by any local, state, or federal agency.

To ensure complete tax compliance, the Applicant's Chief Financial Officer (CFO) is a Certified Public Accountant (CPA) that specializes in the cannabis industry. The first part (18.2) covers the Applicant's money handling procedures, while the second part (18.3) describes how the Applicant will allocate and remit taxes.

18.2 Money Handling for Dispensing Sites

The Applicant has designed rigorous protocols for money handling for the Applicant's Integrated Facility and Dispensing Site operations, including secured storage, point-of-sale procedures, beginning and end of day protocols, secured cash transport, and more.

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At the time required by law, the Dispensary Agent will allocate the appropriate sum for satisfaction of taxes as may be levied against the sale, pursuant to **Rule 583-x-8-.03.8**.

The Certified Dispenser will oversee and sign off on all sales of medical cannabis as the dispensary employee ultimately responsible for each transaction, pursuant to **Rule 583-x-8-.03.2**. Dispensing agents will never allow other dispensing agents to operate from their point-of-sale terminal or cash drawers. If a dispensing agents shift ends in the middle of the day, the agent will follow end-of-day protocols defined below. The new agent beginning a shift in the middle of the day will follow beginning of day protocols.

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18.2.1 Money Handling for Integrated Facility Operations

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18.2.2 Limited Cash On Hand and Cash Transport

18.3 Allocating and Remitting Taxes

The Applicant's business will collect and remit or pay the following taxes: (a) 9% - Medical cannabis sales tax; (b) 4% - Alabama state sales tax; (c) ~6% - Local sales tax, based on city and county; (d) Alabama privilege tax based on net worth; (e) 6.5% - Alabama corporate income tax; and (f) 21% - Federal corporate income tax (in accordance with IRS Tax Code 280E). All purchasers will receive a receipt that clearly shows all relevant taxes that are computed for each transaction. **Collection and Allocation** - The Applicant will allocate money not just for taxes, but for license renewal fees.

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Remittance of State Taxes - The Applicant will report and pay the sales tax in monthly installments on or before the 20th day of the month next succeeding the month in which the tax accrues, unless otherwise provided, in accordance with **§ 40-23-7(a)&(b)**. Similarly, the Applicant will file an Alabama Business Privilege Tax Return and Annual Report and pay all taxes by the due date of the corresponding federal income tax returns as provided by federal law, which shall include the public record disclosures required by §10-2B-16.22 with the DOR for every taxable year and for which it is subject to the tax levied by §40-14A-22, in accordance with **§40-14A-25(a & b)**. The Applicant will file an annual Corporate Income Tax Return (generally Form 1120) and pay corporate income taxes by the 15th day of the fourth month following the close of its tax year. Likewise, the Applicant will remit the Alabama corporate income tax to the DOR within one month following the due date of the corresponding federal income tax return.

18.4 Conclusion

As demonstrated above, the Applicant's *Money Handling and Taxes Plan* is evidence of the meticulous steps the Applicant will take to exceed the requirements for responsible money handling and that all taxes (federal, state, and local) are allocated and remitted. The Applicant operates 125 dispensaries and 17 cultivation & processing facilities over the last decade with no compliance issues with money handling or tax compliance and will deploy the same protocols with Alabama.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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Exhibit 19 – Standard Operating Plan and Procedures

Verification

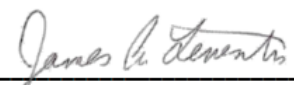
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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Introduction

The Applicant's Integrated Facility will meet and maintain the standards, policies, procedures, and operations, both at the pre-commencement inspection and always thereafter, as affirmed to the Commission at the time of licensing. The Applicant acknowledges that they will be governed by and must comply with the rules for applications and licensing generally pertaining to all applicants, any rules promulgated by the Department applicable to cultivator applicants and, as applicable to the aspect of the Integrated Facility's business, the specific requirements applicable to each type of licensee, as provided in Chapter 5 (cultivators), Chapter 6 (processors), Chapter 7 (secure transporters), and Chapter 8 (dispensaries) pursuant to **Rule 538-x-9-.09**.

19.1 IT Plan

The Applicant's vast experience with numerous Statewide Seed-to-Sale Tracking Systems, more specifically METRC, multiple third-party inventory systems, and patient registries established in other medical states has gone into the development of the Applicant's IT Plan. The Applicant's IT Plan demonstrates the Applicant's ability to exceed the requirements set out by the Commission while addressing future concerns already prevalent in other markets. Proper technology integrated into the Applicant's operations will compliantly track the cultivation, processing, transportation, dispensation, testing, and use of medical cannabis. Upon receipt of a license, the Applicant will immediately establish an account with the Statewide Seed-to-Sale Tracking System, in compliance with **§20-2A-54**. Pursuant to **Rule 538-x-4-.05-1**, the Applicant will, always, maintain technology (whether proprietary, provided through a third party, or if applicable, through the Statewide Seed-to-Sale Tracking System), and through such technology shall track information, sufficient to comply with the requirements of § 20-2A-60, Code of Alabama 1975 (as amended), and any other requirements of the Commission. Tracking information contained in any databases created or maintained by the Applicant will be updated no less often than daily (during the next business day after the incident is discovered or new information has been received) and maintained for a minimum of six years or longer at the request of the Commission, law enforcement personnel, or any court having jurisdiction of a matter arising out of or relating

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to the information so tracked. The Applicant will utilize technologies created by METRC, for the Statewide-Seed-to-Sale Tracking System for a third-party inventory system, and the Alabama Medical Cannabis Patient Registry System created by the Commission. Additionally, pursuant to **Rule 538-x-4-.05-4**, consistent with the requirements of §20-2A-54, Code of Alabama 1975 (as amended), the Applicant will support, participate in, and contribute to the Statewide Seed-to-Sale Tracking System. The Applicant will ensure that its third-party inventory and tracking systems will properly interface with the Statewide Seed-to-Sale Tracking System and, as appropriate, with the patient registry. The Applicant's technology and uploads to the Statewide Seed-to-Sale Tracking System shall be sufficient to allow access to said system by the Commission, and, to the extent necessary and appropriate, patients and caregivers, qualified certifying physicians, other state agencies, other licensees, and law enforcement personnel.

METRC Overview: METRC's robust track-and-trace platform will help facilitate the Alabama Medical Cannabis Commission's data collection and regulatory oversight, enabling the Applicant 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 software-as-a-service (SaaS) system.

automatically reports all required compliance data to Alabama's METRC tracking system and the patient registry. BioTrack has all of the capabilities required to comply with **§20-2A-60(a)** and more. **Alabama Medical Cannabis Patient Registry System Overview:** The Alabama Medical Cannabis Patient Registry System will, among other things, receive, record, and track the following: (i) Physician Certifications; (ii) patient registrations (including Qualifying Medical Conditions, Registered Certifying Physician, and recommended dosage); (iii) designated caregivers; and (iv) patient purchases of medical cannabis by location, date, time,

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amount, and type. Access to the Patient Registry is restricted to: (i) Registered Certifying Physicians; (ii) health care practitioners licensed to prescribe prescription drugs; (iii) licensed pharmacists; (iv) dispensaries; (v) the Alabama Board of Medical Examiners; and (vi) state and local law enforcement agencies (subject to probable cause or reasonable suspicion of a violation of a controlled substance law or DUI, and certain other restrictions).

The Applicant's Chief Technology Officer (CTO) currently manages all information systems and technologies for the Applicant's 125 dispensaries and 17 cultivation/ processing locations and will implement a proven protocol for hardware and software integration. The Applicant's CTO will be the designated liaison with the Commission for purposes of coordinating, monitoring, and updating the Licensee's input to the Statewide Seed-to-Sale-Tracking System pursuant to **Rule 538-x-4-.05-6**. The Applicant's CTO will also coordinate IT Certification administered by the third-party IT provider, or another, as the Commission may designate for each database with which agents must interact, demonstrating their proficiency with respect to those databases. IT Certification will be required for all agents who as part of their duties must interact with the patient registry, the AMCC website, or the Statewide Seed-to-Sale Tracking System, shall undergo pre-employment or when the Applicant first receives the new license, pre-commencement, pursuant to **Rule 538-x-4-.05-5**.

19.1.1 Accurate Recordkeeping

The Applicant's records include but are not limited to, employees, vendors, financial, compliance, patients, inspections, audits, transactions, inventory, usage, cannabis or medical cannabis on hand amounts, disposal records, discrepancies, and all recordkeeping duties and restrictions to comply with the Act and Commission's Rules. Daily physical inventory audits of each facility will help management correct errors and maintain accurate records allowing full reverse traceability. All records are maintained indefinitely in filing cabinets at each facility and will be electronically backed up to a secure server at an off-site location. Electronic records will function similarly to any accounting software as records become part of a permanent history.

the Applicant can generate instant inventory and/or financial statements to comply with reporting and monitoring requirements. Agents' access

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to records is restricted unless they require access to complete their essential job duties. The Applicant has ensured the ability to restore data following an outage, computer, or equipment failure which will enable the Applicant to seamlessly maintain compliant recordkeeping of facility operations. The Applicant will keep electronic and written records of bank statements, journals, ledgers, and other supporting documents such as agreements, checks, invoices, receipts, and vouchers. The Applicant will maintain financial transaction records including the counting, storing, and facilitating of funds transferred to and from the Applicant's facilities.

Security recordkeeping will include Audio/Video surveillance records and visitor records defined as all records related to individuals including employees, vendors, transporters, medical cannabis patients and caregivers, and all others entering and exiting the Applicant's facilities, pursuant to **80- 14-1-.16**. Visitor records will be kept for a minimum of 6 years. Audio/Video surveillance records must be kept for at least 60 days, and longer upon the request of the Commission, its inspectors, or any law enforcement personnel. Audio/Video recordings potentially reflecting an incident of actual or attempted diversion must be kept for the length of a period of two years, or until resolution of the incident and apprehension and discipline or prosecution of the individuals involved in the actual or attempted diversion. All records related to the cultivation of cannabis, destruction, and disposal of cannabis, and storage of medical cannabis in the Applicant's integrated facility will be kept for at least 6 years and made available to the AMCC upon request. Detailed records for all secure transport operations including: (1) Transport manifests;(2) Receipts; (3) Invoices; (4) Bills of lading; (5) Shipping invoices; and (6) Packing slips or any other shipping documents are stored within BioTrack and will be kept for at least 6 years and made available to the AMCC upon request.

19.1.2 Compliance with Inventory Protocols

The Applicant will utilize _____ as a tool to stay compliant with inventory protocols through all processes of the Applicant's operations. _____ will be used during the Applicant's **cultivation, processing, and manufacturing processes** to enter all transactions into the statewide seed-to-sale tracking system operated by the AMCC including

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(1) inventory of all cannabis plants, immature and mature; (2) inventory of in-process cannabis; (3) inventory of medical cannabis products; (4) inventory of cannabis or medical cannabis in quarantine; (5) inventory of all incoming cannabis transferred from a licensed cultivator or processor; (6) in transit cannabis or medical cannabis being transported; and (7) inventory and documentation of cannabis or medical cannabis that were destroyed and disposed of at the integrated facility in compliance with **80-14-1-17**. will be used during the Applicant's **dispensary operations** to enter all transactions into the statewide seed-to-sale tracking system operated by the AMCC including: (1) all inventory; (2) patient usage; and (3) other relevant information as may be necessary or appropriate to the dispensary's business pursuant to § 20-2A-54, Code of Alabama 1975 (as amended). The Applicant's agents will document every product transaction at the time of the transaction and each day's beginning and ending inventory, including purchases, sales, denial of sales, and disposal of products. These records demonstrate the exact products sold, the price of the items, and the method(s) of payment.

Daily and monthly physical inventory audits of each facility will help management correct errors and maintain accurate and compliant inventory numbers. will be used to record daily, and monthly inventory audits conducted by the Applicant's agents.

allows for comprehensive inventory audits of all cannabis and medical cannabis, including immature and mature cannabis plants, in-process medical cannabis, medical cannabis products, and unusable cannabis and/or medical cannabis waste marked for destruction and disposal at each of the Applicant's facilities. The Applicant's Certified Dispenser will ensure that no products in the Applicant's possession exceed their expiration or use-by date. If products in inventory exceed their expiry or use-by date, such goods shall be designated as "medical cannabis waste" and managed in compliance with the Applicant's Waste Management Plan. The Applicant will abide by the expiration and use-by dates for all medical cannabis produced (unless instructed otherwise by the Commission). A Quality Agent will enter each product expiration and use-by date into upon initial transfer to the Vault. The Applicant's inventory system will automatically issue alerts to the Quality Director when a product in inventory is approaching its use-by and expiration date.

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19.1.3 Coordination of Information and Systems

The Chief Technology Officer will ensure all information and technology systems coordinate with one another. The Applicant will utilize coordination between the integration of the Alabama Medical Cannabis Patient Registry System and the Statewide Seed-to-Sale-Tracking System with _____ to ensure regulatory compliance, including vendor coordination. The Applicant will bear the cost of technology sufficient to comply with the requirements of §20-2A-60. The Commission will not pay for the Applicant's systems or upgrades, RFIDs, barcodes, and/or hardware. The coordination of _____ in-system patient records tracking integrated with the Statewide Seed-to-Sale-Tracking System enables the Applicant to comply with the patient-specific purchase limits. Prior to dispensing medical cannabis, the Applicant's dispensing site, acting through a certified dispenser or employee supervised by a certified dispenser, shall confirm that the patient or caregiver holds a valid, current, unexpired, and unrevoked medical cannabis card, and that the dispensing of medical cannabis conforms to the type and amount recommended in the physician certification, and that the amount recommended will not exceed the 60-day daily dosage purchasing limit pursuant to **Rule 583-x-8-03**. _____ can recognize and flag purchases more than authorized limits. An individual patient's purchase history is used with their purchase limits to calculate the maximum purchases allowed for the current transaction. If the amount of medical cannabis requested by a patient exceeds the purchase limit, the sale will not be allowed to go through the system; items will need to be removed until the amount of medical cannabis falls equal to or below the patient's purchase limit. This control prevents both the unintentional and intentional over-dispensing of medical cannabis to patients. When cannabis or medical cannabis is transferred between the Applicant's facilities or other licenses, the coordination between the Applicant's technology system connections will generate transport manifests through linked inventory between licensees and update the Statewide Seed-to-Sale-Tracking System accordingly.

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19.2 Maintenance and Storage of Cannabis and Medical Cannabis Plan

The Applicant will always maintain and review at least annually the plan for the maintenance and storage of cannabis and medical cannabis in the possession and control of the Applicant. Such a plan will include, maintaining cannabis and medical cannabis in a moisture- and a temperature-controlled environment free of pests; keeping stored items secure, properly separated and labeled; and limiting access to cannabis and medical cannabis to essential personnel by position.

19.2.1 Maintenance of Cannabis and Medical Cannabis

By its very nature, cannabis is defined by its moisture content. This moisture content changes rapidly depending on the environment where it is kept. Prior to cannabis being processed into medical cannabis, the Applicant's cannabis will be kept maintained in a storage area at an ideal temperature and humidity to keep mold from growing. Mold thrives in temperatures above 77°F, so cannabis must be stored at a cooler temperature in an environment with a relative humidity between 59% – 63%. The Applicant will maintain all cannabis and medical cannabis storage areas in each of the Applicant's facilities (i.e., Vaults and Quarantine Rooms) in a clean and orderly condition, free from infestation by insects, rodents, birds, and pests of any kind.

The Applicant will employ standards that mandate the segregation of sellable and unsellable products. Products will be placed in separate storage containers, labeled, and separately stored in locked storage areas (sellable items will be stored in the Applicant's vault, whereas unsellable items will be separately stored in a Quarantine area).

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19.2.2 Storage of Cannabis and Medical Cannabis

The Applicant's Integrated Facility has multiple storage areas that will be utilized during the production of cannabis. In-production cannabis will be stored in the drying (dark blue rooms in the image on the right), curing (tan rooms), and walk-in freezer (teal room) until the Applicant is ready to process the cannabis into medical cannabis. The drying, curing, and walk-in freezer rooms are all temperature and humidity controlled to optimal specifications. When cannabis moves to the Applicant's processing operations, cannabis is extracted and processed into oil that will be used to manufacture medical cannabis products. Cannabis oil and processed medical cannabis products will be stored in the secure storage vault (purple room image above). All medical cannabis located at the Applicant's Dispensing Sites will be stored in the secure storage vault (shown in red in the image to the lower left).

When cannabis oil or medical cannabis is required to be stored in the secure storage vault, all items will be placed in containers, labeled, and kept on shelves within the vault.

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19.2.3 Limitation of Access to Cannabis and Medical Cannabis

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. No person will be allowed access to any area of the production facility or dispensing sites containing cannabis and medical cannabis products except authorized personnel whose responsibilities necessitate access to such places, and only if necessary to perform the agent's job duties. All areas in the production facility will be compartmentalized based on function, and access between compartments remains restricted to authorized personnel essential for efficient operation.

19.3 Quality Control/Quality Assurance Plan (Provided in Exhibit 39)

19.4 Contamination and Recall Plan (Provided in Exhibit 40)

19.5 Criminal Activity Plan

All agents require training on relevant criminal activity protocols and the proper handling of violent incidents and other emergencies, including, at a minimum: (1) theft prevention; (2) emergency response, including CPR training; (3) the appropriate use of force, including when the use of force is and is not necessary; (4) the protection of a crime scene; (5) access control to protected areas of a facility; (6) identifying criminal activity related to cannabis or medical cannabis within the facility; (7) steps in reporting criminal activity to the proper

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authorities; (8) preservation of cannabis or medical cannabis; and (9) maintain access to medical cannabis by those who depend on it.

Reporting the Criminal Activity to the Proper Authorities - Upon becoming aware of discrepancies identified during inventory, diversion, theft, loss, or unauthorized destruction of any cannabis or of any loss or unauthorized alteration of records related to cannabis, the Applicant shall immediately notify (1) Appropriate law enforcement authorities; and (2) Commission.

The Applicant will notify the Commission no later than the next business day, followed by written notification no later than ten business days, of any of the following (1) Alarm activation or other events that require a response by public safety personnel; (2) A breach of security; (3) The failure of the security alarm system due to a loss of electrical support or mechanical malfunction that is expected to last longer than eight hours; and (4) Corrective measures are taken if any. Upon request, the Applicant will 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 user lists, operation instructions, and any other security-related information deemed relevant by the Commission or its inspectors. In the event of unlawful behavior, the offender will be immediately reported to the Commission and local law enforcement.

Audio/Video surveillance records are kept for at least 60 days or longer upon the request of the Commission or any law enforcement personnel.

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Preservation of cannabis or medical cannabis during an emergency - While protocols are in place to protect the life and safety of all persons, these events inherently create opportunities for theft and diversion. The Applicant has security plans in place so that sensitive items such as cash and medical cannabis remain secure during emergencies. The Applicant will keep cannabis locked up and secured within the vault, when not in safety display cases on the sales floor. This emphasis on keeping sensitive items locked at all times will help mitigate theft and diversion in the event of an emergency and allow personnel to focus on keeping human life safe. For foreseeable emergencies, medical cannabis will be stored in an access-controlled vault on each premise.

For unforeseeable emergencies, efforts will be made to secure medical cannabis in a vault until the emergency ends or the site is evacuated.

Reasonable efforts to maintain access to medical cannabis - Although vault storage decreases the likelihood of theft of all cannabis and/or medical cannabis at the Applicant's facility, the Applicant will coordinate with other licensees to prepare for an event that could deplete its inventory. The Applicant's vehicles will assist in transfers of cannabis and/or medical cannabis between facilities to accelerate the time to resume normal operations. Additionally, the Applicant will maintain an offsite data backup of the inventory tracking system. This backup data will assist the Applicant in identifying matching products.

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19.6 Emergencies Procedures/Disaster Plan

Based upon years of experience and industry best practices, the Applicant will employ comprehensive emergency management, and workplace hazard plans to mitigate, respond, and quickly resolve emergency incidents effectively.

Preservation of cannabis or medical cannabis -

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Reasonable efforts to maintain access to medical cannabis - Continuity of operations is a Company-wide effort to ensure that essential functions are performed during and after a wide range of emergencies, including localized acts of nature, accidents, and related emergencies. To achieve that goal, the Applicant has identified essential functions and has developed plans that allow those functions to be continued throughout or resumed rapidly after a disruption of everyday activities. Recovery is an ongoing process. The type and breadth of recovery activities will vary based on the nature and scope of the emergency; however, the goal of the recovery phase is to restore the facility to normal operations. Planning for recovery begins in the Preparedness phase and requires support from management to ensure that decisions contribute to the implementation and resolution of all recovery components. Recovery includes (1) Physical and structural recovery; (2) Business recovery; and (3) Restoration of operations. The Applicant's vehicles will assist in transfers of cannabis and/or medical cannabis between facilities to accelerate the time to resume normal operations. In the case the Applicant does not possess medical cannabis products of the same type as the destroyed products, the Applicant will follow the procedures outlined in Section 19.5 to ensure patients maintain access to medical cannabis.

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19.7 Alcohol, Smoke, and Drug-Free Workplace Policy

The Applicant intends to help provide a safe smoke-free, alcohol-free, and drug-free work environment, in compliance with **§20-2A-6**, for their patients, caregivers, and employees. The policy does not interfere with, impair, or impede, any federal restrictions on employment regulations adopted by the United States Department of Transportation in Title 49, Code of Federal Regulations.

All forms of tobacco use, including cigarettes, cigars, e-cigarettes, and smokeless tobacco, are prohibited inside all the Applicant's facilities. Smoking is prohibited in all enclosed areas, including common work areas, conference and meeting rooms, private offices, hallways, employee break rooms, stairs, restrooms, employer-owned or leased vehicles, and all other enclosed facilities. Employees may smoke in their personal vehicles, but smoke and tobacco products must be completely contained within the vehicle. It is not acceptable for smoking or non-smoking employees to be subjected to smoke that they must walk through to reach

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their vehicles or other destinations on Applicant's property.

19.8 Employee Safety Plan

The Applicant's mission is to dispense medical cannabis while ensuring the highest standards for quality of product, service, and public safety. The Applicant expects to minimize risk through plans for employee safety, injury reporting, hazardous material storage and disposal, and physical safety. Preparedness will aid in prevention and allow employees and management to handle any potential safety risks efficiently. Training materials will be distributed through Applicant's employee handbook, which will be made available upon request to the Commission. The Applicant's *Employee Safety Plan* is designed in compliance with parallel OSHA standards and complies with the rules outlined in the Act

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and Commission Rules. A proactive, ongoing process to identify, assess, and mitigate hazards is a core element of any adequate safety and health program. Effective controls protect workers from workplace hazards; prevent injuries, illnesses, and incidents; minimize or eliminate safety and health risks, and help employers provide workers with safe and healthy working conditions. Controls are selected based on feasibility, effectiveness, and permanence. Once controls are implemented, the Applicant will evaluate their efficacy and update accordingly. The Applicant will establish and maintain standards, procedures, and requirements for hazardous and chemical waste product storage and disposal, and chemical storage that complies with Chapters 27 and 30 of Title 22, Code of Alabama, 1975.

In the event the Applicant discovers hazardous threats, chemical spills, or contamination of cannabis or medical cannabis within its possession and control, the Applicant will make enhanced efforts to protect employees. The Applicant will accomplish this through the use of personal protective equipment (PPE) and effectively quarantining all contaminated cannabis and medical cannabis.

The Applicant will adhere to OSHA's Hazard Communication Standard 29 CFR §1910.1200. The Applicant will ensure that the dispensary remains fire-safe with routine maintenance and inspections of fire safety and suppression equipment. The dispensary will be properly lit during normal operating conditions, emergencies, and power outages. The Applicant will maintain sufficient staffing of security guards at each facility to reasonably ensure the safety of the products stored therein; however, the Applicant will maintain, at a minimum, one (1) security guard per facility during the facility's business/operating hours pursuant to **538-x-9-.03-3.m.(8)**.

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Materials that will be present, such as cleaning supplies and standard-use products, will be stored and handled in accordance with applicable requirements of OSHA regulations. Any hazardous materials will be stored, logged, and reported in accordance with OSHA regulations. The Applicant will train management on proper OSHA-recommended standards of hazardous materials. In turn, management will ensure that employees are properly educated on best safety practices pertaining to hazardous materials. This training will: identify potential hazards at the worksite; create standard operating procedures to meet the regulations; improve existing occupational safety and health management systems; arrange safety and health and wellness training; and get qualified for a safety recognition award. The Applicant will follow OSHA, established in 29 CFR 1910.141, to maintain a clean and safe working environment for all employees, as well as any customers, vendors, and visitors at the dispensary. Flooring and work surfaces will be kept free of hazards and cleaned regularly. An air filtration system will be utilized to ensure indoor air quality complies with OSHA standards.

19.9 Confidential Information and Cybersecurity Plan

The Applicant will always maintain and review at least annually, a plan for securing and maintaining confidentiality as to any and all sensitive information and any records required to be confidentially maintained, including, at a minimum, information and records communicated interpersonally, kept physically, or stored virtually, pursuant to **Rule 538-x-4-.07-12.o.(9)**. The Applicant's data security strategy will focus on protecting the confidentiality, integrity, and availability of systems and data through a multi-tier governance plan of critical programs and security standards. The Applicant will implement passive, active, and proactive controls in the security and protection of systems, data, personnel, and all electronically protected health information. The Applicant's network security will, at a minimum, comply with cybersecurity standards set by the International Society of Automation (ISA) and the International Electrotechnical Commission (IEC) standard ISA/IEC 62443 applicable to industrial facilities operated by manufacturers of medical or pharmaceutical businesses. In addition, the Applicant will take all necessary steps

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to ensure the confidentiality of the information received, maintained, and uploaded to any of the above databases, pursuant to **Rule 538-x-4-.05**.

Confidential information will not be disseminated to any other person unless the confidential information is redacted, pursuant to **Rule 538-x-2-.13** The information in the statewide seed-to-sale tracking system is confidential and is exempt from disclosure under the Open Records Act, Article 3 of Chapter 12 of Title 36; provided, pursuant to **§20-2A-60.17.c**. The Applicant will secure the confidentiality of information in the database by preventing access by a person who is not authorized to access the statewide seed-to-sale tracking system or is not authorized to access the information, pursuant to **§20-2A-55(e)**.

The Applicant will maintain all inventories, inventory

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audits, and related documents required by the Commission, and will be available to the Commission upon request. Whenever any sample or record is for the purpose of an investigation or as evidence, such person will tender a receipt to Applicant.

Agent Confidentiality Training - The Applicant's Training Director will train employees on patient confidentiality, including relevant Alabama rules and regulations, relevant HIPAA guidelines, cybersecurity best practices, and the Applicant's SOPs. The Applicant's facility is designed to accommodate patient confidentiality by offering ample space for filling out forms and providing information in a discreet manner. Additionally, employees are taught to dispense products in compliant, closed, opaque bags so that the product is not visible to anyone else when the patient leaves the dispensary. Employees will be trained on proper shredding and media destruction to ensure the Applicant remains compliant with privacy laws and provides protection to all parties to avoid a confidential information leak of any records communicated interpersonally, kept physically, or stored virtually. Employees will be trained never to leave sensitive information in the open.

The Training Director oversees all training on the collection and confidentiality of patient PHI and electronic PHI (ePHI) while also incorporating additional ePHI training from the Applicant's third-party seed-to-sale track system .

Employees are also trained on the 18 fields of information protected under HIPAA, such as patient name, diagnosis, and social security number, among other fields, as well as any part of an individual's medical record or payment history. Employees are trained not to disclose any protected information without express

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written authorization from the patient unless the information is being used under one of HIPAA's limited exceptions, such as to facilitate payment.

Cybersecurity Plan - The Applicant has crafted their *Cybersecurity Security Plan* as a proactive and layered approach to minimize and mitigate these security concerns by implementing a secure network, assessing risks, and implementing redundancies in both physical and electronic access to the network as well as network monitoring for intrusions from both internal and external actors. The plan also addresses the necessary requirements for HIPAA and PCI compliance in accordance with NIST SP-800-53. The Applicant's network security shall, at a minimum, comply with cybersecurity standards set by the International Society of Automation (ISA) and the International Electrotechnical Commission (IEC) standard ISA/IEC 62443 applicable to industrial facilities operated by manufacturers of medical or pharmaceutical businesses, pursuant to **538-x-4-.05**. The Applicant's Cybersecurity Plan protects the digital infrastructure and security system against theft and diversion facilitated or hidden by tampering with computer or electronic records. The Cybersecurity Plan incorporates several layers of protocols and measures that prohibit the accessibility of security measures, including combination numbers, passwords, or electronic or biometric security systems.

19.10 Tracking and Proper Disposal of Waste Cannabis or Medical Cannabis

The Applicant's *Tracking and Proper Disposal of Waste Cannabis or Medical Cannabis Waste Plan* will ensure the Applicant's operations throughout their facilities remain compliant. The Applicant will utilize _____ to track and maintain accurate and comprehensive records regarding waste cannabis or medical cannabis waste that accounts for, reconciles, and evidence of all waste activity related to the disposal of cannabis or medical cannabis. The Applicant will ensure that when destroying cannabis waste or medical cannabis waste, it is destroyed in such a way as to render the material unusable and unrecognizable, in accordance with **§20-2A-62(c)(4)** and **Rules 80-14-1-.11**. If requested by the Commission, the Quality Director will postpone waste disposal activities to allow an agent of the Commission to travel to the facility and be present for the destruction. The Applicant will

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maintain records of waste destruction for at least five years and make records available to the Commission and authorized bodies upon request.

19.10.1 Tracking of Waste Cannabis and Medical Cannabis Waste

Waste cannabis from cultivation and processing operations is logged into _____ as waste and tracked. The Applicant will use calibrated digital scales as cultivation activities are completed to ensure cannabis waste materials are adequately identified, weighed, and tracked before they are designated for destruction and disposal. During cultivation, any foliage removed from plants will be bagged and weighed with other plants from the same batch; this amount is then recorded into _____. During harvest and wet trim, all waste (e.g., branches, stems, water leaves) will be similarly bagged and weighed with other plants from the same harvest batch and recorded into _____. As extraction and processing activities are completed, the Applicant will use calibrated digital scales to weigh all biomass that has been extracted and will require to be destroyed and disposed of. Medical cannabis from the Applicant’s integrated facility that is required to be destroyed will be logged into _____ as waste and tracked. Medical cannabis from a dispensing site that is required to be destroyed will need to transfer the inventory from the dispensing site to the Applicant’s integrated facility. Once the medical cannabis has been transferred back to the Applicant’s Integrated facility, it will be logged into _____ as waste and tracked.

All waste cannabis or medical cannabis waste will be weighed, recorded, and entered in _____ before destruction. Once the Applicant destroys the cannabis and/or medical cannabis, the status of the items is changed to “Destroyed” and the Applicant will enter the required information into _____

Within 24 hours after destroying the waste, the Applicant will notify the Commission, in writing, of the amount of cannabis waste or medical cannabis waste destroyed, including the form, weight, quantity, and any other information requested by the Commission. This information will also be recorded, tracked, and communicated to the Commission through the Statewide Seed-to-Sale Tracking System.

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19.10.2 Destruction of Cannabis Waste from Cultivation and Processing

All cannabis plants, including parts thereof, and any related materials that cannot or will not be processed, transported, or dispensed, are considered cannabis waste. The Applicant acknowledges that any cannabis material not used in medical cannabis must be destroyed in such a way as to render the material unusable and unrecognizable. Any foliage removed from plants (e.g., branches, stems, water leaves), growing media, and any ancillary materials used throughout the cultivation process will be stored in the biomass storage room until it is ready to be destroyed and disposed of.

Cannabis waste from cultivation and processing operations will be required to be destroyed in such a way as to render the material unusable and unrecognizable. As such, the Applicant intends to shred and mix waste cannabis using an industrial shredder and waste grinder. This approach will include shredding and mixing cannabis with non-consumable solid wastes so that the resulting mixture is at least 50% non-cannabis waste. Once cannabis byproduct, scrap, and waste cannabis are incorporated with non-consumable solid waste (destroyed), the mixed waste will be completely unusable and unrecognizable. Nutrient-enriched grow media and hazardous waste materials derived from the Applicant's cultivation and processing operations will be stored in designated chemical/hazardous waste storage rooms and will be disposed of as required by the Environmental Protection Act (EPA), **Rule 80-14-1-.14**, and the associated rules.

19.10.3 Destruction of Medical Cannabis

Medical cannabis may be required or ordered to be destroyed for several reasons including (1) Failure of State Testing Requirements; (2) Past Expiration Date; (3) Damaged Product; (4) Delivery Device Failure; (5) Cross-Contaminated Product; or (6) Product Recall. Medical cannabis, from the Applicant's integrated facility or transferred back to the Applicant's integrated facility, that is required to be destroyed and disposed of will be stored in the

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Secured Quarantine Storage Room until the destruction has been requested and approved. Medical cannabis is removed from product packaging and must then be rendered unusable and unrecognizable. The Applicant will follow the same procedures for the destruction of medical cannabis as the destruction of cannabis waste above. The product packaging is also shredded, deemed unrecognizable, and then recycled

19.10.4 Proper Disposal of Cannabis Waste and Medical Cannabis

Final disposal of cannabis and medical cannabis waste that has been rendered unusable and unrecognizable (i.e., destroyed) will be transported from the Applicant's integrated facility to a permitted waste facility. To transport destroyed cannabis waste to a permitted waste facility, the Applicant will contract with an approved third-party waste management company licensed to operate in the State of Alabama. The Applicant will arrange for a regular pickup to prevent the accumulation of waste, which could present both sanitation and security risks. Records for all waste that has been transported will include the date and time of waste transport, total weight of waste, third-party waste management company used, waste management driver information, and location of waste facility.

19.11 Security Plan (Provided in Exhibit 33)

19.12 Grow Plan

Pursuant to **Rule 80-14-1-.06**, the Applicant intends to cultivate cannabis in an indoor and enclosed structure; each cannabis plant or batch of cannabis plants will be cultivated in an individual receptacle containing soil or growing media, to foster portability, limit cross-contamination, and facilitate proper monitoring of each plant. Containers for batches of plants will be clearly identified and traceable. The Applicant will not permit cultivation outdoors nor directly on the ground onsite. Pursuant to **Rule 80-14-1-.07**, the Applicant will only cultivate cannabis cultivars approved by the department prior to the acquisition of plant material. Cultivars will not be derived from hemp or industrial hemp as defined by Ala. Admin. Code **Rule 80-10-21-.02 (19)** but must be derived from cannabis plants that have a high likelihood of producing medical cannabis. The Applicant will locate further than 1 mile

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from any licensed hemp or cannabis cultivation site while limiting the visibility of cannabis,
in any form, from outside the perimeter barrier in compliance with **Rule 80-14-1-.08**.

19.12.1 Number of Cannabis Plants to be Cultivated

The Applicant has a two-phase approach to its construction and cultivation plan.

19.12.2 Methods of Cultivation

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19.12.3 Environmental Control and Optimal Settings

19.12.4 Fertilizer Application and Optimal Nutrient Levels

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19.12.5 Integrated Pest Management, Additives, Pesticides and Herbicides

The Alabama Department of Agriculture and Industries (ADAI) recommends following the Hemp Pest Management Guide published by Extension for pesticide use. Patient safety being paramount, the Applicant has developed an *Integrated Pest Management (IPM)*, plan that enhances current cannabis industry practices with proven methods from both the food production industry and from the plant science community. The Applicant submits to all pesticide (restrictions, usage, required testing, recordkeeping, and inspection) requirements in compliance with **Rule 80-14-1-.13**. The plan includes a facility design to reduce infiltration of insects, mites, and spores; tissue culturing mother stock plants to eliminate viruses and other systemic diseases; restricted access to mother rooms; strict Standard Operating Procedures (SOPs) to prevent contamination; routine pest scouting and record-keeping; weekly releases of proven beneficial insects and mites; organic pesticide applications compatible with the beneficial insects/mites present on the crop; and culling of affected branches or whole plants.

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19.13 Engineering Plans and Specifications (Provided in Exhibit 32)

19.14 Chain of Custody, Inventory, Tracking, and Interfacing with Statewide Seed-to-Sale Tracking System for Cultivation Operations

The Applicant will implement an unbroken chain of custody from seed to sale that will be tracked using (third-party seed-to-sale tracking system), in conjunction with the Statewide Seed-to-Sale Tracking System in compliance with **Rule 80-14-1-17**. is capable of tracking lot and batch information throughout the entire chain of custody as well as all products, conversions, and derivatives throughout the entire chain of custody, in compliance with **§20-2A-60(a)(2)&(3)**. The Applicant will enter all transactions into and the Statewide Seed-to-Sale Tracking System. At a minimum, these transactions must include the inventory of cannabis plants in the cultivation facility, the location of the cannabis when it leaves the cultivation facility, and the documentation showing any plants or cannabis material that were destroyed and disposed of at the cultivation facility, in compliance with **Rule 80-14-1-17(1)**. The Applicant will account for all cannabis plants and other materials that have ever been in the custody or control of the Applicant, at all times. This includes from planting to disposal or from planting to such time as a medical cannabis product is dispensed through a dispensary, pursuant to **Rule 80-14-1-17(2)**. The Applicant's plan demonstrates a continuous chain of custody protocol for all cannabis plants and cannabis material. Additionally, the chain of custody protocol requires that at any time, no fewer than two employees of the Applicant are responsible for the location and security of all cannabis plants or related materials within the custody or control of the Applicant, in accordance with **Rule 80-14-1-17(3)**. In fact, as will be detailed below, the Applicant's chain of custody protocols requires that three employees are always responsible for the location and security of all cannabis and medical cannabis in possession or under the control of the Applicant. The Applicant's **Inventory Manager** will be responsible for the location and security of cannabis, medical cannabis, and related materials at all times, from seed to sale (or disposal).

Thus, the Applicant's chain of custody begins in the cultivation department, where the **Cultivation Director, Cultivation Agent, and Inventory Manager** will be responsible for

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the location and security of the cannabis and related materials.

A batch number will be assigned at the time of planting for a specified number of plants, as specified in **Rule 538-x-1-.04-5**.

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The Applicant will not alter the chain-of-custody protocols, without first receiving written permission-from the Commission and the Department, in accordance with **Rule 80-14-1-.17(3)**.

Conclusion

In conclusion, the Applicant has developed Standard Operating Plans and Procedures that cover every aspect of its operations. The SOPs meticulously comply with the Act and the Commission’s Rules and far exceed the criteria of Exhibit 19.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 20 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

20.1 Five Page Summary

The Applicant has provided a verified copy of the Applicant's 2,225 proposed Policies and Procedures Manual. In compliance with **Rule 538-x-4-07-12.o.** the Applicant's Standard Operating Plan and Procedures (SOPs) will be readily accessed from the physical site of each operation upon the request of inspectors, the Commission, or Commission staff and will be updated annually. Each policy outlines the authority, duties, and restrictions of each division.

(1) A 20-page **Cultivation** policy and procedures document has been provided covering mothering, propagation, vegetative, flowering, harvesting, and trimming policies inclusive of plant stage timing and growing mediums. The policies comply with the regulations outlined in Chapter 5, §20-2A-22, and the Department of Agriculture Rules Ala. Admin. r. 80-14-1, et seq. The policies include organic fertilization procedures, nutrient compositions/management, irrigation systems, and nutrient monitoring. The policies are accompanied by twenty cGMP SOPs and thirteen integrated pest management SOPs, in total, 310 pages of proprietary SOPs have been included below. Thirty-seven pages of ORMI certified plant additive Material Safety Data Sheets (MSDS) are also included.

(2) A 196-page **Extraction** and **Manufacturing** policies and procedures document, compliant with Chapter 6 regulations, includes step-by-step procedures include twenty meticulous SOPs covering equipment, manuals, the manufacturing process of all intended product formulations including Tablets, Capsules, Tinctures, Gels, oils, and creams for topical use, Suppositories, Transdermal patches, Nebulizers and Liquids or oils for use in an inhaler. SOPs cover each step of the extraction, post extraction, processing, formulation, packaging, remediation, and labeling procedures.

(3) An 89-page **Quality Assurance and Quality Control** policies and procedures manual, compliant with the Act and Commission rules, with corresponding 355-page SOP manual cover the entire universe of QA/QC inclusive of

(4) A detailed **Dispensing Policies** document covers how dispensing agents interact with patients,

(5) A 24-page **Transportation Policies** document,

(6) A 37-page **Employment Policies** document

(7) A 67-page **Security Policies** document,

(8) An 85-page **IT Policies** document provides detailed information on general IT practices, establishing/ maintaining the internal tracking and Statewide Seed-to-Sale Tracking system, cultivation/ processing/ transportation/ dispensing tracking procedures.

(9) A 20-page **Environmental Policies** document how the applicant will conserve water and energy, projected consumption totals, HVAC systems, water usage, water treatment, water filtration, drainage, minimizing carbon footprint, material selection, paperless communications, alternative energy plan, treatment of wastewater, water reclamation, water recycling, and noise/air/ light pollution strategies.

20.1.1 Conclusion

The Applicant has implemented these comprehensive procedures in seventeen states across the country including seventeen cultivation/ processing locations and 125 retail locations. The manuals and plans include an incredible amount of proprietary information but demonstrate the Applicant's ability to go above and beyond the Commission's requirements. The Chief Compliance Officer in conjunction with Quality Director will implement processes and procedures and oversee Change Management. Job descriptions, job duties, and chain of command are reviewed annually to ensure operational efficiency.

20.1.2 Policies and Procedures Table of Content

Operations

Cultivation Manual – page 6

Extraction and Processing Manual – page 375

Manufacturing – page 501

Quality Assurance/ Quality Control Manual – page 625

Contamination and Recall Manual – page 712

Internal Testing Manual – page 762

Sanitation Manual – page 864

Material Safety Data Sheets – page 936

Packaging Manual – page 1,052

Dispensing Policies – page 1,074

Dispensing Manual – page 1,085

Brand Guidelines – page 1161

Transportation Manual– page 1,170

Transportation Procedures – page 1,231

Employment Policies – page 1,269

Employee Profiles – page 1,307

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Employee Handbook – page 1,460

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Confidential Information and Cybersecurity – page 1,693

Information Technology Policies– page 1,281

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<<<< End of Five Page Summary >>>>



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HIGHLY CONFIDENTIAL

ALABAMA PROCUREMENT
REGISTRY

Cultivation Manual

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Designated Contact | **James A. Leventis, Esq.**
Chief Compliance Officer





Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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Attachment XX

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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SECTION 1. IDENTIFICATION

Product name : GOJO® Luxury Foam Antibacterial Handwash

Manufacturer or supplier's details

Company name of supplier : GOJO Industries, Inc.
 Address : One GOJO Plaza, Suite 500
 Akron OH 44311
 Telephone : 1 (330) 255-6000
 Emergency telephone : 1-800-424-9300 CHEMTREC

Recommended use of the chemical and restrictions on use

Recommended use : Antibacterial Soap

Restrictions on use : This is a personal care or cosmetic product that is safe for consumers and other users under normal and reasonably foreseeable use. Cosmetics and consumer products, specifically defined by regulations around the world, are exempt from the requirement of an SDS for the consumer. While this material is not considered hazardous, this SDS contains valuable information critical to the safe handling and proper use of the product for industrial workplace conditions as well as unusual and unintended exposures such as large spills. This SDS should be retained and available for employees and other users of this product. For specific intended-use guidance, please refer to the information provided on the package or instruction sheet.

SECTION 2. HAZARDS IDENTIFICATION
GHS Classification

Flammable liquids : Category 3

Serious eye damage : Category 1

GHS Label element

Hazard pictograms :



Signal Word : Danger

Hazard Statements : H226 Flammable liquid and vapor.
 H318 Causes serious eye damage.

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Precautionary Statements

- Prevention:**
 P210 Keep away from heat/sparks/open flames/hot surfaces. No smoking.
 P233 Keep container tightly closed.
 P241 Use explosion-proof electrical/ ventilating/ lighting/ equipment.
 P242 Use only non-sparking tools.
 P243 Take precautionary measures against static discharge.
 P280 Wear protective gloves/ eye protection/ face protection.
- Response:**
 P303 + P361 + P353 IF ON SKIN (or hair): Take off immediately all contaminated clothing. Rinse skin with water/shower.
 P305 + P351 + P338 + P310 IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or doctor/ physician.
- Storage:**
 P403 + P235 Store in a well-ventilated place. Keep cool.
- Disposal:**
 P501 Dispose of contents/ container to an approved waste disposal plant.

Other hazards

Vapors may form explosive mixture with air.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Substance / Mixture : Mixture

Hazardous ingredients

Chemical Name	CAS-No.	Concentration (%)
Ethanol	64-17-5	>= 1 - < 5
Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt	87782-19-0	>= 1 - < 5
Ammonium dodecyl sulphate	2235-54-3	>= 1 - < 5
Propylene glycol	57-56-6	>= 1 - < 5
4-chloro-3,5-dimethylphenol	88-04-0	>= 0,1 - < 1

SECTION 4. FIRST AID MEASURES

- General advice** : In the case of accident or if you feel unwell, seek medical advice immediately.
When symptoms persist or in all cases of doubt seek medical advice.
- If inhaled** : If inhaled, remove to fresh air.
Get medical attention if symptoms occur.
- In case of skin contact** : Wash with water and soap as a precaution.
Get medical attention if symptoms occur.
- In case of eye contact** : In case of contact, immediately flush eyes with plenty of water

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- for at least 15 minutes.
If easy to do, remove contact lens, if worn.
Get medical attention immediately.
- If swallowed : If swallowed, DO NOT induce vomiting.
Get medical attention if symptoms occur.
Rinse mouth thoroughly with water.
- Most important symptoms and effects, both acute and delayed : Causes serious eye damage.
- Protection of first-aiders : First Aid responders should pay attention to self-protection, and use the recommended personal protective equipment when the potential for exposure exists.
- Notes to physician : Treat symptomatically and supportively.

SECTION 5. FIRE-FIGHTING MEASURES

- Suitable extinguishing media : Water spray
Alcohol-resistant foam
Dry chemical
Carbon dioxide (CO₂)
- Unsuitable extinguishing media : High volume water jet
- Specific hazards during fire fighting : Do not use a solid water stream as it may scatter and spread fire.
Flash back possible over considerable distance.
Vapors may form explosive mixtures with air.
Exposure to combustion products may be a hazard to health.
- Hazardous combustion products : Carbon oxides
Sulfur oxides
Nitrogen oxides (NO_x)
- Specific extinguishing methods : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Use water spray to cool unopened containers.
Remove undamaged containers from fire area if it is safe to do so.
Evacuate area.
- Special protective equipment for fire-fighters : In the event of fire, wear self-contained breathing apparatus.
Use personal protective equipment.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions, protective equipment and emergency procedures : Remove all sources of ignition.
Use personal protective equipment.
Follow safe handling advice and personal protective

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- equipment recommendations.
- Environmental precautions** : Discharge into the environment must be avoided. Prevent further leakage or spillage if safe to do so. Prevent spreading over a wide area (e.g. by containment or oil barriers). Retain and dispose of contaminated wash water. Local authorities should be advised if significant spillages cannot be contained.
- Methods and materials for containment and cleaning up** : Non-sparking tools should be used. Soak up with inert absorbent material. Suppress (knock down) gases/vapors/mists with a water spray jet. For large spills, provide diking or other appropriate containment to keep material from spreading. If diked material can be pumped, store recovered material in appropriate container. Clean up remaining materials from spill with suitable absorbent. Local or national regulations may apply to releases and disposal of this material, as well as those materials and items employed in the cleanup of releases. You will need to determine which regulations are applicable. Sections 13 and 15 of this SDS provide information regarding certain local or national requirements.

SECTION 7. HANDLING AND STORAGE

- Technical measures** : See Engineering measures under EXPOSURE CONTROLS/PERSONAL PROTECTION section.
- Local/Total ventilation** : Use with local exhaust ventilation. Use only in an area equipped with explosion proof exhaust ventilation.
- Advice on safe handling** : Avoid inhalation of vapor or mist. Do not swallow. Do not get in eyes. Avoid prolonged or repeated contact with skin. Handle in accordance with good industrial hygiene and safety practice. Non-sparking tools should be used. Keep container tightly closed. Keep away from heat and sources of ignition. Take precautionary measures against static discharges. Take care to prevent spills, waste and minimize release to the environment.
- Conditions for safe storage** : Keep in properly labeled containers. Keep tightly closed. Keep in a cool, well-ventilated place. Store in accordance with the particular national regulations. Keep away from heat and sources of ignition.

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Materials to avoid : Do not store with the following product types:
 Strong oxidizing agents
 Organic peroxides
 Flammable solids
 Pyrophoric liquids
 Pyrophoric solids
 Self-heating substances and mixtures
 Substances and mixtures which in contact with water emit flammable gases
 Explosives
 Gases

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Ingredients with workplace control parameters

Ingredients	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
Ethanol	64-17-5	TWA	1,000 ppm 1,900 mg/m ³	NIOSH REL
		TWA	1,000 ppm 1,900 mg/m ³	OSHA Z-1
		STEL	1,000 ppm	ACGIH
Propylene glycol	57-55-6	TWA	10 mg/m ³	US WEEL

Hazardous components without workplace control parameters

Ingredients	CAS-No.
Alpha-Sulfo-omega-(dodecyl(oxy)-poly(oxy-1,2-ethanediy)). Ammonium salt	67762-19-0
Ammonium dodecyl sulphate	2235-54-3
4-chloro-3,5-dimethylphenol	88-04-0

Engineering measures : Minimize workplace exposure concentrations.
 Use only in an area equipped with explosion proof exhaust ventilation.
 Use with local exhaust ventilation.
 Dust formation may be relevant in the processing of this product. In addition to substance-specific OELs, general limitations of concentrations of particulates in the air at workplaces have to be considered in workplace risk assessment. Relevant limits include: OSHA PEL for Particulates Not Otherwise Regulated of 15 mg/m³ - total dust, 5 mg/m³ - respirable fraction; and ACGIH TWA for Particles (insoluble or poorly soluble) Not Otherwise Specified of 3 mg/m³ - respirable particles, 10 mg/m³ - inhalable particles.

Personal protective equipment

Respiratory protection : General and local exhaust ventilation is recommended to

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maintain vapor exposures below recommended limits. Where concentrations are above recommended limits or are unknown, appropriate respiratory protection should be worn. Follow OSHA respirator regulations (29 CFR 1910.134) and use NIOSH/MSHA approved respirators. Protection provided by air purifying respirators against exposure to any hazardous chemical is limited. Use a positive pressure air supplied respirator if there is any potential for uncontrolled release, exposure levels are unknown, or any other circumstance where air purifying respirators may not provide adequate protection.

Hand protection	
Material	: Impervious gloves
Material	: Flame retardant gloves
Remarks	: Choose gloves to protect hands against chemicals depending on the concentration specific to place of work. Breakthrough time is not determined for the product. Change gloves often! For special applications, we recommend clarifying the resistance to chemicals of the aforementioned protective gloves with the glove manufacturer. Wash hands before breaks and at the end of workday.
Eye protection	: Wear the following personal protective equipment: Chemical resistant goggles must be worn. If splashes are likely to occur, wear: Face-shield
Skin and body protection	: Select appropriate protective clothing based on chemical resistance data and an assessment of the local exposure potential. Wear the following personal protective equipment: Flame retardant antistatic protective clothing. Skin contact must be avoided by using impervious protective clothing (gloves, aprons, boots, etc).
Hygiene measures	: Ensure that eye flushing systems and safety showers are located close to the working place. When using do not eat, drink or smoke. Wash contaminated clothing before re-use.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance	: liquid
Color	: clear, amber, brown
Odor	: fruity
Odor Threshold	: No data available

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pH	: 4.5 - 8.5
Melting point/freezing point	: No data available
Initial boiling point and boiling range	: 83 °C
Flash point	: 58.9 °C
Evaporation rate	: No data available
Flammability (solid, gas)	: Not applicable
Upper explosion limit	: No data available
Lower explosion limit	: No data available
Vapor pressure	: No data available
Relative vapor density	: No data available
Density	: 1.00 g/cm3
Solubility(ies) Water solubility	: soluble
Partition coefficient: n-octanol/water	: Not applicable
Autoignition temperature	: No data available
Decomposition temperature	: The substance or mixture is not classified self-reactive.
Viscosity Viscosity, kinematic	: 10 - 20 mm2/s (20 °C)
Explosive properties	: Not explosive
Oxidizing properties	: The substance or mixture is not classified as oxidizing.

SECTION 10. STABILITY AND REACTIVITY

Reactivity	: Not classified as a reactivity hazard.
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: Flammable liquid and vapor. Vapors may form explosive mixture with air. Can react with strong oxidizing agents.
Conditions to avoid	: Heat, flames and sparks.
Incompatible materials	: Oxidizing agents

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Hazardous decomposition products : No hazardous decomposition products are known.

SECTION 11. TOXICOLOGICAL INFORMATION
Information on likely routes of exposure

Inhalation
Skin contact
Ingestion
Eye contact

Acute toxicity

Not classified based on available information.

Product:

Acute oral toxicity : Acute toxicity estimate: > 5,000 mg/kg
Method: Calculation method

Ingredients:
Ethanol:

Acute oral toxicity : LD50 (Rat): > 5,000 mg/kg
Acute inhalation toxicity : LC50 (Rat): 124.7 mg/l
Exposure time: 4 h
Test atmosphere: vapor

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Acute oral toxicity : LD50 (Rat): 4,100 mg/kg
Method: OECD Test Guideline 401
Remarks: Based on data from similar materials

Acute dermal toxicity : LD50 (Rat): > 2,000 mg/kg
Method: OECD Test Guideline 402
Assessment: The substance or mixture has no acute dermal toxicity
Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Acute oral toxicity : LD50 (Rat): 2,000 mg/kg
Method: EC Directive 92/69/EEC B.1 Acute Toxicity (Oral)
Remarks: Based on data from similar materials

Propylene glycol:

Acute oral toxicity : LD50 (Rat): > 5,000 mg/kg
Acute inhalation toxicity : LC50 (Rabbit): > 159 mg/l, > 51091 ppm
Exposure time: 4 h
Test atmosphere: dust/mist
Assessment: The substance or mixture has no acute inhalation toxicity
Acute dermal toxicity : LD50 (Rabbit): > 2,000 mg/kg
Assessment: The substance or mixture has no acute dermal toxicity

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4-chloro-3,5-dimethylphenol:

Acute oral toxicity : Acute toxicity estimate: 500 mg/kg
Method: Expert judgment
Remarks: Based on harmonised classification in EU regulation 1272/2008, Annex VI

Acute inhalation toxicity : LC50 (Rat): > 6.29 mg/l
Test atmosphere: dust/mist

Acute dermal toxicity : LD50 (Rat): > 2,000 mg/kg

Skin corrosion/irritation

Not classified based on available information.

Product:

Result: No skin irritation

Ingredients:**Ethanol:**

Species: Rabbit
Method: OECD Test Guideline 404
Result: No skin irritation

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Species: Rabbit
Method: OECD Test Guideline 404
Result: Skin irritation
Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Species: Rabbit
Method: OECD Test Guideline 404
Result: Skin irritation

Propylene glycol:

Species: Rabbit
Method: OECD Test Guideline 404
Result: No skin irritation

4-chloro-3,5-dimethylphenol:

Result: Skin irritation
Remarks: Based on harmonised classification in EU regulation 1272/2008, Annex VI

Serious eye damage/eye irritation

Causes serious eye damage.

Ingredients:**Ethanol:**

Species: Rabbit
Result: Irritation to eyes, reversing within 21 days
Method: OECD Test Guideline 405

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Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Species: Rabbit

Result: Irreversible effects on the eye

Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Species: Rabbit

Result: Irreversible effects on the eye

Method: OECD Test Guideline 405

Propylene glycol:

Species: Rabbit

Result: No eye irritation

Method: OECD Test Guideline 405

4-chloro-3,5-dimethylphenol:

Result: Irreversible effects on the eye

Respiratory or skin sensitization

Skin sensitization: Not classified based on available information.

Respiratory sensitization: Not classified based on available information.

Product:

Assessment: Does not cause skin sensitization.

Ingredients:**Ethanol:**

Test Type: Local lymph node assay (LLNA)

Routes of exposure: Skin contact

Species: Mouse

Result: negative

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Test Type: Maximization Test (GPMT)

Routes of exposure: Skin contact

Species: Guinea pig

Method: OECD Test Guideline 406

Result: negative

Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Test Type: Maximization Test (GPMT)

Routes of exposure: Skin contact

Species: Guinea pig

Result: negative

Remarks: Based on data from similar materials

Propylene glycol:

Test Type: Maximization Test (GPMT)

Routes of exposure: Skin contact

Species: Guinea pig

Result: negative

4-chloro-3,5-dimethylphenol:

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Assessment: Probability or evidence of skin sensitization in humans
 Remarks: Based on harmonised classification in EU regulation 1272/2008, Annex VI

Germ cell mutagenicity

Not classified based on available information.

Ingredients:

Ethanol:

- Genotoxicity in vitro : Test Type: In vitro mammalian cell gene mutation test
 Result: negative
- Genotoxicity in vivo : Test Type: Rodent dominant lethal test (germ cell) (in vivo)
 Species: Mouse
 Application Route: Ingestion
 Result: negative

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

- Genotoxicity in vitro : Test Type: Bacterial reverse mutation assay (AMES)
 Method: OECD Test Guideline 471
 Result: negative
 Remarks: Based on data from similar materials
- : Test Type: In vitro mammalian cell gene mutation test
 Method: OECD Test Guideline 476
 Result: negative
 Remarks: Based on data from similar materials
- Genotoxicity in vivo : Test Type: Mutagenicity (in vivo mammalian bone-marrow
 cytogenetic test, chromosomal analysis)
 Species: Mouse
 Application Route: Ingestion
 Method: OECD Test Guideline 475
 Result: negative
 Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

- Genotoxicity in vitro : Test Type: In vitro mammalian cell gene mutation test
 Result: negative
 Remarks: Based on data from similar materials
- Genotoxicity in vivo : Test Type: Mammalian erythrocyte micronucleus test (in vivo
 cytogenetic assay)
 Species: Mouse
 Application Route: Ingestion
 Method: OECD Test Guideline 474
 Result: negative
 Remarks: Based on data from similar materials

Propylene glycol:

- Genotoxicity in vitro : Test Type: Bacterial reverse mutation assay (AMES)
 Result: negative
- Genotoxicity in vivo : Test Type: In vivo micronucleus test
 Species: Mouse
 Application Route: Intraperitoneal injection

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Result: negative

4-chloro-3,5-dimethylphenol:

Genotoxicity in vitro : Test Type: Bacterial reverse mutation assay (AMES)
Result: negative

Carcinogenicity

Not classified based on available information.

Ingredients:

Ammonium dodecyl sulphate:

Species: Rat
Application Route: Ingestion
Exposure time: 2 Years
Result: negative
Remarks: Based on data from similar materials

Propylene glycol:

Species: Rat
Application Route: Ingestion
Exposure time: 2 Years
Result: negative

IARC

No ingredient of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

OSHA

No ingredient of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No ingredient of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Reproductive toxicity

Not classified based on available information.

Ingredients:

Ethanol:

Effects on fertility : Test Type: Two-generation reproduction toxicity study
Species: Mouse
Application Route: Ingestion
Method: OECD Test Guideline 416
Result: negative

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Effects on fertility : Test Type: Two-generation reproduction toxicity study
Species: Rat
Application Route: Ingestion
Result: negative
Remarks: Based on data from similar materials

Effects on fetal development : Test Type: Two-generation reproduction toxicity study

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Species: Rat
Application Route: Ingestion
Result: negative
Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Effects on fetal development : Test Type: Embryo-fetal development
Species: Rat
Application Route: Ingestion
Result: negative
Remarks: Based on data from similar materials

Propylene glycol:

Effects on fertility : Species: Mouse
Application Route: Ingestion
Result: negative

Effects on fetal development : Test Type: Embryo-fetal development
Species: Mouse
Application Route: Ingestion
Result: negative

STOT-single exposure

Not classified based on available information.

STOT-repeated exposure

Not classified based on available information.

Repeated dose toxicity**Ingredients:****Ethanol:**

Species: Rat
NOAEL: 2,400 mg/kg
Application Route: Ingestion
Exposure time: 2 y

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Species: Rat
NOAEL: > 225 mg/kg
Application Route: Ingestion
Exposure time: 90 d
Method: OECD Test Guideline 408
Remarks: Based on data from similar materials

Propylene glycol:

Species: Rat
NOAEL: 1,700 mg/kg
Application Route: Ingestion
Exposure time: 2 y

4-chloro-3,5-dimethylphenol:

Species: Rabbit
NOAEL: 180 mg/kg
Application Route: Skin contact

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Exposure time: 90 d

Aspiration toxicity

Not classified based on available information.

SECTION 12. ECOLOGICAL INFORMATION

Ecotoxicity

Ingredients:

Ethanol:

Toxicity to fish	: LC50 (<i>Pimephales promelas</i> (fathead minnow)): > 1,000 mg/l Exposure time: 96 h
Toxicity to daphnia and other aquatic invertebrates	: EC50 (<i>Daphnia magna</i> (Water flea)): > 1,000 mg/l Exposure time: 48 h
Toxicity to algae	: EC50 (<i>Chlorella vulgaris</i> (Fresh water algae)): 275 mg/l Exposure time: 72 h Method: OECD Test Guideline 201
Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity)	: NOEC (<i>Daphnia magna</i> (Water flea)): 9.6 mg/l Exposure time: 9 d
Toxicity to bacteria	: EC50 (<i>Photobacterium phosphoreum</i>): 32.1 mg/l Exposure time: 0.25 h

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Toxicity to fish	: LC50 (<i>Danio rerio</i> (zebra fish)): 7.1 mg/l Exposure time: 96 h Method: OECD Test Guideline 203 Remarks: Based on data from similar materials
Toxicity to daphnia and other aquatic invertebrates	: EC50 (<i>Daphnia magna</i> (Water flea)): 7.4 mg/l Exposure time: 48 h Method: OECD Test Guideline 202 Remarks: Based on data from similar materials
Toxicity to algae	: ErC50 (<i>Desmodesmus subspicatus</i> (green algae)): 27.7 mg/l Exposure time: 72 h Method: OECD Test Guideline 201 Remarks: Based on data from similar materials NOEC (<i>Desmodesmus subspicatus</i> (green algae)): 0.95 mg/l Exposure time: 72 h Method: OECD Test Guideline 201 Remarks: Based on data from similar materials
Toxicity to fish (Chronic toxicity)	: NOEC (<i>Oncorhynchus mykiss</i> (rainbow trout)): 0.14 mg/l Exposure time: 28 d Method: OECD Test Guideline 204 Remarks: Based on data from similar materials

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Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity) : NOEC (Daphnia magna (Water flea)): 0.27 mg/l
 Exposure time: 21 d
 Remarks: Based on data from similar materials

Toxicity to bacteria : EC10 (Pseudomonas putida): > 10 g/l
 Exposure time: 16 h
 Method: DIN 38 412 Part 8
 Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Toxicity to fish : LC50 (Oncorhynchus mykiss (rainbow trout)): 3.6 mg/l
 Exposure time: 96 h
 Method: OECD Test Guideline 203
 Remarks: Based on data from similar materials

Toxicity to daphnia and other aquatic invertebrates : EC50 (Daphnia magna (Water flea)): 4.7 mg/l
 Exposure time: 48 h
 Method: Tested according to Directive 92/69/EEC.
 Remarks: Based on data from similar materials

Toxicity to algae : ErC50 (Desmodesmus subspicatus (green algae)): > 20 mg/l
 Exposure time: 72 h
 Method: Directive 67/548/EEC, Annex V, C.3.
 Remarks: Based on data from similar materials

EC10 (Desmodesmus subspicatus (green algae)): 5.4 mg/l
 Exposure time: 72 h
 Method: Directive 67/548/EEC, Annex V, C.3.
 Remarks: Based on data from similar materials

Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity) : NOEC (Ceriodaphnia dubia (water flea)): 0.88 mg/l
 Exposure time: 7 d
 Remarks: Based on data from similar materials

Toxicity to bacteria : EC0 (Pseudomonas putida): 409 mg/l
 Exposure time: 16 h
 Method: DIN 38 412 Part 8
 Remarks: Based on data from similar materials

Propylene glycol:

Toxicity to fish : LC50 (Oncorhynchus mykiss (rainbow trout)): 40,613 mg/l
 Exposure time: 96 h

Toxicity to daphnia and other aquatic invertebrates : EC50 (Ceriodaphnia dubia (water flea)): 18,340 mg/l
 Exposure time: 48 h

Toxicity to algae : EC50 (Skeletonema costatum (marine diatom)): 19,000 mg/l
 Exposure time: 48 h
 Method: OECD Test Guideline 201

Toxicity to fish (Chronic toxicity) : Chronic Toxicity Value: 2,500 mg/l
 Exposure time: 30 d

Toxicity to daphnia and other aquatic invertebrates : NOEC (Ceriodaphnia dubia (water flea)): 29,000 mg/l
 Exposure time: 7 d

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(Chronic toxicity)

Toxicity to bacteria : NOEC (*Pseudomonas putida*): > 20,000 mg/l
Exposure time: 18 h

4-chloro-3,5-dimethylphenol:

Toxicity to fish : LC50 (*Oncorhynchus mykiss* (rainbow trout)): 0.76 mg/l
Exposure time: 96 h

Toxicity to daphnia and other aquatic invertebrates : EC50 (*Daphnia magna* (Water flea)): 7.7 mg/l
Exposure time: 48 h

M-Factor (Acute aquatic toxicity) : 1

Persistence and degradability**Ingredients:****Ethanol:**

Biodegradability : Result: Readily biodegradable.
Biodegradation: 84 %
Exposure time: 20 d

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Biodegradability : Result: Readily biodegradable.
Biodegradation: 100 %
Exposure time: 28 d
Method: Directive 67/548/EEC Annex V, C.4.C.
Remarks: Based on data from similar materials

Ammonium dodecyl sulphate:

Biodegradability : Result: Readily biodegradable.
Biodegradation: 75.7 %
Exposure time: 28 d
Method: OECD Test Guideline 301B
Remarks: Based on data from similar materials

Propylene glycol:

Biodegradability : Result: Readily biodegradable.
Biodegradation: 98.3 %
Exposure time: 28 d
Method: OECD Test Guideline 301F

Bioaccumulative potential**Ingredients:****Ethanol:**

Partition coefficient: n-octanol/water : log Pow: -0.35

Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt:

Partition coefficient: n-octanol/water : log Pow: 0.3


GOJO® Luxury Foam Antibacterial Handwash

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama)

Version 2.0	Revision Date: 04/08/2015	MSDS Number: 31378-00005	Date of last issue: 03/19/2015 Date of first issue: 12/11/2014
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Ammonium dodecyl sulphate:

Partition coefficient: n-octanol/water : log Pow: 0.8 - 0.91

Propylene glycol:

Partition coefficient: n-octanol/water : log Pow: -1.07

4-chloro-3,5-dimethylphenol:

Partition coefficient: n-octanol/water : log Pow: 3.27

Mobility in soil

No data available

Other adverse effects

No data available

SECTION 13. DISPOSAL CONSIDERATIONS**Disposal methods**

Waste from residues : Dispose of in accordance with local regulations.

Contaminated packaging
 : Dispose of as unused product.
 Empty containers should be taken to an approved waste handling site for recycling or disposal.
 Do not burn, or use a cutting torch on, the empty drum.
SECTION 14. TRANSPORT INFORMATION**International Regulation****UNRTDG**

Not regulated as a dangerous good

IATA-DGR

Not regulated as a dangerous good

IMDG-Code

Not regulated as a dangerous good

Transport in bulk according to Annex II of MARPOL 73/78 and the IBC Code

Not applicable for product as supplied.

Domestic regulation**49 CFR**

Not regulated as a dangerous good

SECTION 15. REGULATORY INFORMATION**EPCRA - Emergency Planning and Community Right-to-Know**


GOJO® Luxury Foam Antibacterial Handwash

Alabama Public Records Law (§ 30-12-40, et seq., Code of Alabama)

Version	Revision Date:	MSDS Number:	Date of last issue: 03/19/2015
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CERCLA Reportable Quantity

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : Fire Hazard
Acute Health Hazard

SARA 302 : No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

US State Regulations
Pennsylvania Right To Know

Water	7732-18-5	70 - 90 %
Ethanol	64-17-5	1 - 5 %
Ammonium dodecyl sulphate	2235-54-3	1 - 5 %
Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt	67762-19-0	1 - 5 %
Propylene glycol	57-55-6	1 - 5 %
Ammonium sulfate	7783-20-2	0.1 - 1 %
Propan-2-ol	67-63-0	0.1 - 1 %

New Jersey Right To Know

Water	7732-18-5	70 - 90 %
Ethanol	64-17-5	1 - 5 %
Ammonium dodecyl sulphate	2235-54-3	1 - 5 %
Alpha-Sulfo-omega-(dodecyloxy)-poly(oxy-1,2-ethanediyl), Ammonium salt	67762-19-0	1 - 5 %
Propylene glycol	57-55-6	1 - 5 %

California Prop 65

This product does not contain any chemicals known to the State of California to cause cancer, birth, or any other reproductive defects.

The ingredients of this product are reported in the following inventories:

AICS : All ingredients listed or exempt.

Inventories

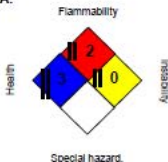
AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TCSI (Taiwan), TSCA (USA)

Version: 2.0 Revision Date: 04/08/2015 MSDS Number: 31378-00005 Date of last issue: 03/19/2015
 Date of first issue: 12/11/2014

SECTION 16. OTHER INFORMATION

Further information

NFPA:



HMIS III:

HEALTH	3
FLAMMABILITY	2
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
 2 = Moderate, 3 = High
 4 = Extreme, * = Chronic

Full text of other abbreviations

ACGIH	: USA, ACGIH Threshold Limit Values (TLV)
NIOSH REL	: USA, NIOSH Recommended Exposure Limits
OSHA Z-1	: USA, Occupational Exposure Limits (OSHA) - Table Z-1 Limits for Air Contaminants
US WEEL	: USA, Workplace Environmental Exposure Levels (WEEL)
ACGIH / STEL	: Short-term exposure limit
NIOSH REL / TWA	: Time-weighted average concentration for up to a 10-hour workday during a 40-hour workweek
OSHA Z-1 / TWA	: 8-hour time weighted average
US WEEL / TWA	: 8-hr TWA

Sources of key data used to compile the Material Safety Data Sheet : Internal technical data, data from raw material SDSs, OECD eChem Portal search results and European Chemicals Agency, <http://echa.europa.eu/>

Revision Date : 04/08/2015

Items where changes have been made to the previous version are highlighted in the body of this document by two vertical lines.

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and shall not be considered a warranty or quality specification of any type. The information provided relates only to the specific material identified at the top of this SDS and may not be valid when the SDS material is used in combination with any other materials or in any process, unless specified in the text. Material users should review the information and recommendations in the specific context of their intended manner of handling, use, processing and storage, including an assessment of the appropriateness of the SDS material in the user's end product, if applicable.

US / Z8

SAFETY DATA SHEET

LYSOL® Brand II All Purpose Cleaner - Trigger - Lemon Breeze

HEALTH • HYGIENE • HOME

1. Product and company identification**Product name** : LYSOL® Brand II All Purpose Cleaner - Trigger - Lemon Breeze

Distributed by : Reckitt Benckiser (Canada) Inc.
1680 Tech Avenue, Unit #2
Mississauga, Ontario L4W 5S9
CANADA
Telephone: +1 905 283 7000

Reckitt Benckiser LLC.
Morris Corporate Center IV
399 Interpace Parkway (P.O. Box 225)
Parsippany, New Jersey 07054-0225
+1 973 404 2600

Emergency telephone number (Medical) : 1-800-338-6167**Emergency telephone number (Transport)** : 1-800-424-9300 (U.S. & Canada) CHEMTREC
Outside U.S. and Canada (North America), call Chemtrec 703-527-3887**Website:** : <http://www.rbnainfo.com>

Synonym : Lysol Brand II Kills 99.9% of Viruses & Bacteria** All Purpose Cleaner Complete Clean
•Lemon Breeze Scent
•Fresh Mountain Scent
•Cherry Blossom & Pomegranate Scent
•Green Apple Scent
•Orange Scent
•Citrus Scent
•Country Scent

Product use : Multipurpose Cleaner

This SDS is designed for **workplace employees, emergency personnel and for other conditions and situations where there is greater potential for large-scale or prolonged exposure, in accordance with the requirements of USDOL Occupational Safety and Health Administration.**

This SDS is not applicable for consumer use of our products. For consumer use, all precautionary and first aid language is provided on the product label in accordance with the applicable government regulations, and shown in Section 15 of this SDS.

SDS # : D8212215 v9.0

1. Product and company identification

Formulation #:	: - 1955-003 / 8173996 (Lemon) - 1967-019A / 8200249 (Fresh Energy) - 1660-185 / 8200251 (Orange) - 1660-184 / 8200252 (Green Apple) - 1967-019B / 8200253 (Citrus) - e0062-125 / 8200254 (Country Side) - e0062-099 / 8200255 (Lemon) - e0062-100 / 8200256 (Fresh Energy) - e0062-101 / 8200257 (Orange) - e0062-102 / 8200258 (Green Apple) - e0062-103 / 8200259 (Cherry Blossom & Pomegranate) - e0062-154 / 8200261 (Country Side)
DIN #	: 02455803
UPC Code / Sizes	: HDPE Trigger bottle

2. Hazards identification

Classification of the substance or mixture	: EYE IRRITATION - Category 2B SKIN SENSITIZATION - Category 1
---	---

GHS label elements

Hazard pictograms



Signal word	: Warning
Hazard statements	: Causes eye irritation. May cause an allergic skin reaction.

Precautionary statements

General	: Keep out of reach of children. If medical advice is needed, have product container or label at hand.
Prevention	: Wear protective gloves. Avoid breathing vapor. Wash hands thoroughly after handling. Contaminated work clothing must not be allowed out of the workplace.
Response	: IF ON SKIN: Wash with plenty of soap and water. Wash contaminated clothing before reuse. If skin irritation or rash occurs: Get medical attention. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. If eye irritation persists: Get medical attention.
Storage	: Not applicable.
Disposal	: Dispose of contents and container in accordance with all local, regional, national and international regulations.
Supplemental label elements	: None known.
Hazards not otherwise classified	: None known.

3. Composition/information on ingredients

Substance/mixture : Mixture

Ingredient name	%	CAS number
dodecyldimethylamine oxide	1-5	1643-20-5
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	0.1-1	68424-85-1

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

4. First aid measures

Description of necessary first aid measures

- Eye contact** : Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. If irritation persists, get medical attention.
- Inhalation** : Remove victim to fresh air and keep at rest in a position comfortable for breathing. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Get medical attention if adverse health effects persist or are severe. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.
- Skin contact** : Wash with plenty of soap and water. Remove contaminated clothing and shoes. Wash contaminated clothing thoroughly with water before removing it, or wear gloves. Continue to rinse for at least 10 minutes. Get medical attention. In the event of any complaints or symptoms, avoid further exposure. Wash clothing before reuse. Clean shoes thoroughly before reuse.
- Ingestion** : Wash out mouth with water. Remove dentures if any. Remove victim to fresh air and keep at rest in a position comfortable for breathing. If material has been swallowed and the exposed person is conscious, give small quantities of water to drink. Stop if the exposed person feels sick as vomiting may be dangerous. Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. Get medical attention if adverse health effects persist or are severe. Never give anything by mouth to an unconscious person. If unconscious, place in recovery position and get medical attention immediately. Maintain an open airway. Loosen tight clothing such as a collar, tie, belt or waistband.

Most important symptoms/effects, acute and delayed

Potential acute health effects

- Eye contact** : Causes eye irritation.
- Inhalation** : No known significant effects or critical hazards.
- Skin contact** : May cause an allergic skin reaction.
- Ingestion** : No known significant effects or critical hazards.

Over-exposure signs/symptoms

- Eye contact** : Adverse symptoms may include the following:
irritation
watering
redness
- Inhalation** : No specific data.

4. First aid measures

- Skin contact** : Adverse symptoms may include the following:
irritation
redness
- Ingestion** : No specific data.

Indication of immediate medical attention and special treatment needed, if necessary

- Notes to physician** : Treat symptomatically. Contact poison treatment specialist immediately if large quantities have been ingested or inhaled.
- Specific treatments** : No specific treatment.
- Protection of first-aiders** : No action shall be taken involving any personal risk or without suitable training. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

5. Fire-fighting measures

Extinguishing media

- Suitable extinguishing media** : Use an extinguishing agent suitable for the surrounding fire.
- Unsuitable extinguishing media** : None known.

Specific hazards arising from the chemical : In a fire, hazardous decomposition products may be produced.

- Hazardous thermal decomposition products** : No specific data.

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

- For non-emergency personnel** : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Avoid breathing vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.
- For emergency responders** : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

6. Accidental release measures

- Small spill** : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.
- Large spill** : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

7. Handling and storage

Precautions for safe handling

- Protective measures** : Put on appropriate personal protective equipment (see Section 8). Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Do not get in eyes or on skin or clothing. Do not ingest. Avoid breathing vapor or mist. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Empty containers retain product residue and can be hazardous. Do not reuse container.
- Conditions for safe storage, including any incompatibilities** : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

8. Exposure controls/personal protection

Control

Occupational exposure limits

Not applicable.

- Appropriate engineering controls** : Good general ventilation should be sufficient to control worker exposure to airborne contaminants.
- Environmental exposure controls** : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

- Hygiene measures** : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Contaminated work clothing should not be allowed out of the workplace. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.
- Eye/face protection** : Safety eyewear complying with an approved standard should be used when a risk assessment indicates this is necessary to avoid exposure to liquid splashes, mists, gases or dusts. If contact is possible, the following protection should be worn, unless the assessment indicates a higher degree of protection: chemical splash goggles.

Skin protection

8. Exposure controls/personal protection

Hand protection	: Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.
Body protection	: Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
Other skin protection	: Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.
Respiratory protection	: Based on the hazard and potential for exposure, select a respirator that meets the appropriate standard or certification. Respirators must be used according to a respiratory protection program to ensure proper fitting, training, and other important aspects of use.

9. Physical and chemical properties

Appearance

Physical state	: Liquid. [Clear.]
Color	: turquoise
Odor	: Not available.
Odor threshold	: Not available.
pH	: 10.5 to 11.3 [Conc. (% w/w): 100%]
Melting point	: Not available.
Boiling point	: Not available.
Flash point	: Closed cup: >93.3°C (>199.9°F)
Evaporation rate	: Not available.
Flammability (solid, gas)	: Not available.
Lower and upper explosive (flammable) limits	: Not available.
Vapor pressure	: Not available.
Vapor density	: Not available.
Relative density	: 0.98 to 1.01
Solubility	: Easily soluble in the following materials: cold water and hot water.
Partition coefficient: n-octanol/water	: Not available.
Auto-ignition temperature	: Not available.
Decomposition temperature	: Not available.
Viscosity	: Not available.
Flow time (ISO 2431)	: Not available.

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Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975)

10. Stability and reactivity

Reactivity	: No specific test data related to reactivity available for this product or its ingredients.
Chemical stability	: The product is stable.
Possibility of hazardous reactions	: Under normal conditions of storage and use, hazardous reactions will not occur.
Conditions to avoid	: No specific data.
Incompatible materials	: Do not mix with household chemicals.
Hazardous decomposition products	: Under normal conditions of storage and use, hazardous decomposition products should not be produced.

11. Toxicological information

Information on toxicological effects

Acute toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides *Lysol All Purpose Cleaner Trigger	LD50 Oral	Rat	344 mg/kg	-
	LC50 Inhalation Vapor	Rat	>2.23 mg/l	4 hours
	LD50 Dermal LD50 Oral	Rabbit Rat	>5050 mg/kg >5000 mg/kg	- -

Conclusion/Summary : Not classified Harmful *Information is based on toxicity test result of a similar product.

Irritation/Corrosion

Product/ingredient name	Result	Species	Score	Exposure	Observation
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides dodecyldimethylamine oxide *Lysol All Purpose Cleaner Trigger	Skin - Severe irritant	Rabbit	-	25 milligrams	-
	Eyes - Severe irritant Skin - Mild irritant	Rabbit	-	1 Percent	-
		Human	-	48 hours 3.7 Percent	-
	Skin - Severe irritant	Rabbit	-	24 hours 2 milligrams	-
	Eyes - Cornea opacity	Rabbit	>1	-	14 days
Skin - Edema	Rabbit	0	4 hours	14 days	

Conclusion/Summary

- Skin** : Non-irritant to skin. *Information is based on toxicity test result of a similar product.
- Eyes** : Irritating to eyes. *Information is based on toxicity test result of a similar product.
- Respiratory** : Based on available data, the classification criteria are not met.

Sensitization

Product/ingredient name	Route of exposure	Species	Result
*Lysol All Purpose Cleaner Trigger	skin	Mouse	Sensitizing

Conclusion/Summary

- Skin** : Skin sensitizer *Information is based on toxicity test result of a similar product.

11. Toxicological information

Respiratory : Based on available data, the classification criteria are not met.

Mutagenicity

Product/ingredient name	Test	Experiment	Result
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	OECD 471 - Bacterial Reverse Mutation Test	Experiment: In vitro Subject: Bacteria	Negative
	OECD 473 - Mammalian Chromosomal Aberration Test	Experiment: In vitro Subject: Mammalian-Animal	Negative
	OECD 478 - Mammalian Cell Gene Mutation Test	Experiment: In vitro Subject: Mammalian-Animal	Negative

Conclusion/Summary : Based on available data, the classification criteria are not met.

Carcinogenicity

Not available.

Conclusion/Summary : Based on available data, the classification criteria are not met.

Reproductive toxicity

Not available.

Conclusion/Summary : Based on available data, the classification criteria are not met.

Teratogenicity

Not available.

Conclusion/Summary : Based on available data, the classification criteria are not met.

Specific target organ toxicity (single exposure)

Not available.

Specific target organ toxicity (repeated exposure)

Not available.

Aspiration hazard

Not available.

Information on the likely routes of exposure : Not available.

Potential acute health effects

- Eye contact** : Causes eye irritation.
- Inhalation** : No known significant effects or critical hazards.
- Skin contact** : May cause an allergic skin reaction.
- Ingestion** : No known significant effects or critical hazards.

Symptoms related to the physical, chemical and toxicological characteristics

- Eye contact** : Adverse symptoms may include the following:
irritation
watering
redness
- Inhalation** : No specific data.

D8212215 v9.0

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975)

11. Toxicological information

- Skin contact** : Adverse symptoms may include the following:
irritation
redness
- Ingestion** : No specific data.

Delayed and immediate effects and also chronic effects from short and long term exposure**Short term exposure**

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

Long term exposure

- Potential immediate effects** : Not available.
- Potential delayed effects** : Not available.

Potential chronic health effects

Not available.

- Conclusion/Summary** : Based on available data, the classification criteria are not met.
- General** : Once sensitized, a severe allergic reaction may occur when subsequently exposed to very low levels.
- Carcinogenicity** : No known significant effects or critical hazards.
- Mutagenicity** : No known significant effects or critical hazards.
- Teratogenicity** : No known significant effects or critical hazards.
- Developmental effects** : No known significant effects or critical hazards.
- Fertility effects** : No known significant effects or critical hazards.

Numerical measures of toxicity**Acute toxicity estimates**

Not available.

12. Ecological information**Toxicity**

Product/ingredient name	Result	Species	Exposure
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	Acute EC50 0.016 mg/l	Daphnia	48 hours
	Acute LC50 64 ppb Fresh water	Fish - Oncorhynchus mykiss	96 hours

Persistence and degradability

D8212215 v9.0

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

12. Ecological information

Product/Ingredient name	Aquatic half-life	Photolysis	Biodegradability
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	-	-	Readily

Bioaccumulative potential

Not available.

Mobility in soilSoil/water partition coefficient (K_{oc}) : Not available.

Other adverse effects : No known significant effects or critical hazards.

13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

14. Transport information

Regulatory information	UN number	Proper shipping name	Classes	PG*	Label	Additional information
DOT Classification	Not Regulated	Not applicable.	Not available.	-		-
TDG Classification	Not Regulated	Not applicable.	Not available.	-		-
Mexico Classification	Not Regulated	Not applicable.	Not available.	-		-
IMDG Class	Not Regulated	Not applicable.	Not available.	-		-

D8212215 v9.0

14. Transport information

IATA-DGR Class	Not Regulated	Not applicable.	Not available.	-	-	-
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Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

PG* : Packing group

15. Regulatory information

U.S. Federal regulations : **TSCA 4(a) proposed test rules:** Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides; Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides
TSCA 8(a) PAIR: 1-phenoxypropan-2-ol; decanal; nonanal; octanal; 2-methylundecanal
TSCA 8(a) CDR Exempt/Partial exemption: Not determined
United States inventory (TSCA 8b): All components are listed or exempted.

Clean Air Act Section 112 : Not listed

(b) Hazardous Air Pollutants (HAPs)

Clean Air Act Section 602 Class I Substances : Not listed

Clean Air Act Section 602 Class II Substances : Not listed

DEA List I Chemicals (Precursor Chemicals) : Not listed

DEA List II Chemicals (Essential Chemicals) : Not listed

SARA 302/304

Composition/information on ingredients

No products were found.

SARA 304 RQ : Not applicable.

SARA 311/312

Classification : Immediate (acute) health hazard

Composition/information on ingredients

Name	%	Fire hazard	Sudden release of pressure	Reactive	Immediate (acute) health hazard	Delayed (chronic) health hazard
Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	< 0.1	No.	No.	No.	Yes.	No.

State regulations

Massachusetts : None of the components are listed.

D8212215 v9.0

15. Regulatory information

- New York : None of the components are listed.
 New Jersey : None of the components are listed.
 Pennsylvania : None of the components are listed.

Canada

- WHMIS (Canada) : Class D-2B: Material causing other toxic effects (Toxic).

Canadian lists

- Canadian NPRI : None of the components are listed.
 CEPA Toxic substances : None of the components are listed.
 Canada inventory : All components are listed or exempted.

Label elements

- Signal word : CAUTION
 Hazard statements : EYE IRRITANT
 Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.
 Precautionary measures : Keep out of reach of children.
 Do not get in eyes.
 After handling, always wash hands thoroughly with soap and water.

16. Other information

Hazardous Material
 Information System (U.S.A.) :

Health	1
Flammability	0
Physical hazards	0
Personal protection	B

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although HMIS® ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

National Fire Protection
 Association (U.S.A.) :



Reprinted with permission from NFPA 704-2001, Identification of the Hazards of Materials for Emergency Response Copyright ©1997, National Fire Protection Association, Quincy, MA 02269. This reprinted material is not the complete and official position of the National Fire Protection Association, on the referenced subject which is represented only by the standard in its entirety.

16. Other information

Copyright ©2001, National Fire Protection Association, Quincy, MA 02269. This warning system is intended to be interpreted and applied only by properly trained individuals to identify fire, health and reactivity hazards of chemicals. The user is referred to certain limited number of chemicals with recommended classifications in NFPA 49 and NFPA 325, which would be used as a guideline only. Whether the chemicals are classified by NFPA or not, anyone using the 704 systems to classify chemicals does so at their own risk.

Key to abbreviations : ATE = Acute Toxicity Estimate
 BCF = Bioconcentration Factor
 GHS = Globally Harmonized System of Classification and Labelling of Chemicals
 IATA = International Air Transport Association
 IBC = Intermediate Bulk Container
 IMDG = International Maritime Dangerous Goods
 LogPow = logarithm of the octanol/water partition coefficient
 MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
 UN = United Nations

Date of issue : 12/06/2018
Date of previous issue : 20/03/2018
Version : 9
Prepared by : Reckitt Benckiser India Ltd
 Plot No 48
 Sector - 32
 Institutional Area
 Gurgaon, Haryana
 India - 122001

Revision comments : Update of the SDS.

Indicates information that has changed from previously issued version.

Notice to reader

To the best of our knowledge, the information contained herein is accurate. However, neither the above-named supplier, nor any of its subsidiaries, assumes any liability whatsoever for the accuracy or completeness of the information contained herein.

Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.



RB is a member of the CSPA Product Care Product Stewardship Program.

SECTION 1. IDENTIFICATION

Product name : Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Manufacturer or supplier's details

Company name of supplier : ULINE

Address : 12575 Uline Drive
Pleasant Prairie, WI 53158

Telephone : 1-800-295-5510

Emergency telephone number : 1-800-424-9300 CHEMTREC

Recommended use of the chemical and restrictions on use

Recommended use : Skin-care

Restrictions on use : This is a personal care or cosmetic product that is safe for consumers and other users under normal and reasonably foreseeable use. Cosmetics and consumer products, specifically defined by regulations around the world, are exempt from the requirement of an SDS for the consumer. While this material is not considered hazardous, this SDS contains valuable information critical to the safe handling and proper use of the product for industrial workplace conditions as well as unusual and unintended exposures such as large spills. This SDS should be retained and available for employees and other users of this product. For specific intended-use guidance, please refer to the information provided on the package or instruction sheet.

SECTION 2. HAZARDS IDENTIFICATION

GHS Classification

Not a hazardous substance or mixture.

GHS label elements

Not a hazardous substance or mixture.

Other hazards

None known.

SECTION 3. COMPOSITION/INFORMATION ON INGREDIENTS

Hazardous components

Chemical name	CAS-No.	Concentration (%)
C11-15 Alkane/cycloalkane	64742-47-8	>= 5 - < 10
Limonene	5989-27-5	>= 0.1 - < 1

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version 1.0

SDS Number: 400000005480

Revision Date: 09/19/2017

SECTION 4. FIRST AID MEASURES

- General advice : In the case of accident or if you feel unwell, seek medical advice immediately.
When symptoms persist or in all cases of doubt seek medical advice.
- If inhaled : If inhaled, remove to fresh air.
If symptoms persist, call a physician.
- In case of skin contact : Wash with water and soap as a precaution.
Get medical attention if irritation develops and persists.
- In case of eye contact : In case of contact, immediately flush eyes with plenty of water for at least 15 minutes.
If easy to do, remove contact lens, if worn.
Seek medical advice.
- If swallowed : If swallowed, DO NOT induce vomiting.
Rinse mouth with water.
Obtain medical attention.
- Most important symptoms and effects, both acute and delayed : None known.
- Protection of first-aiders : First Aid responders should pay attention to self-protection and use the recommended protective clothing

SECTION 5. FIREFIGHTING MEASURES

- Suitable extinguishing media : Use water spray, alcohol-resistant foam, dry chemical or carbon dioxide.
- Unsuitable extinguishing media : None known.
- Hazardous combustion products : Carbon oxides
- Specific extinguishing methods : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
Use water spray to cool unopened containers.
- Further information : Collect contaminated fire extinguishing water separately. This must not be discharged into drains.
Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.
- Special protective equipment for firefighters : In the event of fire, wear self-contained breathing apparatus.
Use personal protective equipment.

SECTION 6. ACCIDENTAL RELEASE MEASURES

- Personal precautions, protective equipment and : Use personal protective equipment.
Ensure adequate ventilation.

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version 1.0 SDS Number: 100000005490, Revision Date: 06/19/2017

- emergency procedures : Evacuate personnel to safe areas.
Material can create slippery conditions.
- Environmental precautions : Discharge into the environment must be avoided.
Prevent further leakage or spillage if safe to do so.
Prevent spreading over a wide area (e.g. by containment or oil barriers).
Retain and dispose of contaminated wash water.
Local authorities should be advised if significant spillages cannot be contained.
- Methods and materials for containment and cleaning up : Keep in suitable, closed containers for disposal.
Clean contaminated floors and objects thoroughly while observing environmental regulations.

SECTION 7. HANDLING AND STORAGE

- Advice on safe handling : For personal protection see section 8.
Do not swallow.
Avoid contact with eyes.
Keep container closed when not in use.
- Conditions for safe storage : Keep in properly labelled containers.
Keep container tightly closed in a dry and well-ventilated place.
Store in accordance with the particular national regulations.

SECTION 8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Components with workplace control parameters

Components	CAS-No.	Value type (Form of exposure)	Control parameters / Permissible concentration	Basis
C11-15 Alkane/cycloalkane	64742-47-8	TWA (Mist)	5 mg/m ³	OSHA Z-1
		TWA	200 mg/m ³ (as total hydrocarbon vapor)	ACGIH
		TWA (Mist)	5 mg/m ³	NIOSH REL
		ST (Mist)	10 mg/m ³	NIOSH REL
Limonene	5989-27-5	TWA	20 ppm	ACGIH

Personal protective equipment

- Respiratory protection : No personal respiratory protective equipment normally required.
- Eye protection : No special protective equipment required.
Wear face-shield and protective suit for abnormal processing problems.
- Skin and body protection : No special protective equipment required.
- Protective measures : Choose body protection in relation to its type, to the concentration and amount of dangerous substances, and to

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version: 001 Date: 01/01/2017 Revision: 001 Date: 01/01/17

the specific work-place.

Hygiene measures : Handle in accordance with good industrial hygiene and safety practice.
Avoid contact with eyes.

SECTION 9. PHYSICAL AND CHEMICAL PROPERTIES

Appearance : liquid

Colour : grey, opaque

Odour : citrus

Odour Threshold : No data available

pH : 6.0 - 8.0, (20 °C)

Solidification / Setting point : 11.4 °C

Initial boiling point and boiling range : 98.00 °C

Flash point : > 100 °C

Evaporation rate : No data available

Upper explosion limit : No data available

Lower explosion limit : No data available

Vapour pressure : No data available

Relative vapour density : No data available

Density : 1.0328 g/cm³

Solubility(ies)
Water solubility : soluble

Partition coefficient: n-octanol/water : Not applicable

Auto-ignition temperature : No data available

Thermal decomposition : The substance or mixture is not classified self-reactive.

Viscosity
Viscosity, kinematic : 10000 - 50000 mm²/s (20 °C)

Explosive properties : Not explosive

Oxidizing properties : The substance or mixture is not classified as oxidizing.

SECTION 10. STABILITY AND REACTIVITY

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version 1.0 SDS Number: 400069005469 Revision Date: 06/19/2017

Reactivity	: Not classified as a reactivity hazard.
Chemical stability	: Stable under normal conditions.
Possibility of hazardous reactions	: No dangerous reaction known under conditions of normal use.
Incompatible materials	: Oxidizing agents
Hazardous decomposition products	: No hazardous decomposition products are known.

SECTION 11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Inhalation
 Eye contact
 Skin contact

Acute toxicity

Not classified based on available information.

Components:**C11-15 Alkane/cycloalkane:**

Acute oral toxicity	: LD50 (Rat): > 5,000 mg/kg
Acute inhalation toxicity	: LC50 (Rat): > 5.3 mg/l Exposure time: 4 h Test atmosphere: dust/mist Assessment: The substance or mixture has no acute inhalation toxicity Remarks: Based on data from similar materials
Acute dermal toxicity	: LD50 (Rabbit): > 3,160 mg/kg Assessment: The substance or mixture has no acute dermal toxicity

Limonene:

Acute oral toxicity	: LD50 (Rat): > 2,000 mg/kg Assessment: The substance or mixture has no acute oral toxicity Remarks: Based on data from similar materials
---------------------	---

Skin corrosion/irritation

Not classified based on available information.

Components:**C11-15 Alkane/cycloalkane:**

Assessment: Repeated exposure may cause skin dryness or cracking.

Limonene:

Species: Rabbit
 Result: Skin irritation

Serious eye damage/eye irritation

Not classified based on available information.

Components:

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Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version 1.0 SDS Number: 40000000480, Revision Date: 04/26/2017

C11-15 Alkane/cycloalkane:

Species: Rabbit

Result: No eye irritation

Limonene:

Species: Rabbit

Result: No eye irritation

Respiratory or skin sensitisation

Skin sensitisation: Not classified based on available information.

Respiratory sensitisation: Not classified based on available information.

Product:

Assessment: Does not cause skin sensitisation.

Components:

C11-15 Alkane/cycloalkane:

Test Type: Maximisation Test (GPMT)

Exposure routes: Skin contact

Species: Guinea pig

Result: negative

Remarks: Based on data from similar materials

Limonene:

Test Type: Local lymph node assay (LLNA)

Exposure routes: Skin contact

Species: Mouse

Result: positive

Assessment: Probability or evidence of skin sensitisation in humans

Germ cell mutagenicity

Not classified based on available information.

Components:

C11-15 Alkane/cycloalkane:

Genotoxicity in vitro : Test Type: Bacterial reverse mutation assay (AMES)
Result: negative

Genotoxicity in vivo : Test Type: Chromosomal aberration
Test species: Rat
Application Route: Intraperitoneal injection
Result: negative
Remarks: Based on data from similar materials

Limonene:

Genotoxicity in vitro : Test Type: In vitro mammalian cell gene mutation test
Result: negative

Genotoxicity in vivo : Test Type: Transgenic rodent somatic cell gene mutation assay
Test species: Rat
Application Route: Ingestion
Result: negative

Carcinogenicity

Not classified based on available information.

Components:**Limonene:**

Species: Mouse

Application Route: Ingestion

Exposure time: 103 weeks

Result: negative

IARC

No component of this product present at levels greater than or equal to 0.1% is identified as probable, possible or confirmed human carcinogen by IARC.

OSHA

No component of this product present at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.

NTP

No component of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

Reproductive toxicity

Not classified based on available information.

Components:**C11-15 Alkane/cycloalkane:**

Effects on fertility

: Test Type: One-generation reproduction toxicity study

Species: Rat

Application Route: Ingestion

Result: negative

Remarks: Based on data from similar materials

Effects on foetal development

: Test Type: Embryo-foetal development

Species: Rat

Application Route: Ingestion

Result: negative

STOT - single exposure

Not classified based on available information.

STOT - repeated exposure

Not classified based on available information.

Repeated dose toxicity**Components:****C11-15 Alkane/cycloalkane:**

Species: Rat

NOAEL: > 10.4 mg/l

Application Route: inhalation (vapour)

Exposure time: 90 d

Remarks: Based on data from similar materials

Limonene:

Species: Rat

NOAEL: 600 mg/kg

Application Route: Ingestion

Exposure time: 13 w

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version 1.9 SDS Number: 40000005490 Revision Date: 09/19/2017

Aspiration toxicity

Not classified based on available information.

Components:**C11-15 Alkane/cycloalkane:**

The substance or mixture is known to cause human aspiration toxicity hazards or has to be regarded as if it causes a human aspiration toxicity hazard.

Limonene:

The substance or mixture is known to cause human aspiration toxicity hazards or has to be regarded as if it causes a human aspiration toxicity hazard.

SECTION 12. ECOLOGICAL INFORMATION**Ecotoxicity****Components:****C11-15 Alkane/cycloalkane:**

- Toxicity to fish : LL50 (Danio rerio (zebra fish)): > 250 mg/l
Exposure time: 96 h
Test substance: Water Accommodated Fraction
Method: OECD Test Guideline 203
- Toxicity to daphnia and other aquatic invertebrates : EL50 (Acartia tonsa): > 3,193 mg/l
Exposure time: 48 h
Test substance: Water Accommodated Fraction
- Toxicity to algae : EL50 (Skeletonema costatum (marine diatom)): > 3,200 mg/l
Exposure time: 72 h
Test substance: Water Accommodated Fraction

NOELR (Skeletonema costatum (marine diatom)): 993 mg/l
Exposure time: 72 h
Test substance: Water Accommodated Fraction
- Toxicity to daphnia and other aquatic invertebrates (Chronic toxicity) : NOELR (Ceriodaphnia Dubia (water flea)): > 70 mg/l
Exposure time: 8 d
Test substance: Water Accommodated Fraction
- Toxicity to bacteria : EC50: > 100 mg/l
Exposure time: 3 h

Limonene:

- Toxicity to fish : LC50 (Pimephales promelas (fathead minnow)): 0.72 mg/l
Exposure time: 96 h
- Toxicity to daphnia and other aquatic invertebrates : EC50 (Daphnia magna (Water flea)): 0.36 mg/l
Exposure time: 48 h
- Toxicity to algae : ErC50 (Desmodesmus subspicatus (green algae)): 150 mg/l
Exposure time: 72 h
Test substance: Water Accommodated Fraction
Remarks: Based on data from similar materials
- M-Factor (Acute aquatic toxicity) : 1

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version: 0 SDS Number: 990102005460 Revision Date: 01/19/2017

Persistence and degradability

Components:

C11-15 Alkane/cycloalkane:

Biodegradability : Result: Readily biodegradable.
Biodegradation: 82 %
Exposure time: 24 d
Method: OECD Test Guideline 301F

Limonene:

Biodegradability : Result: Readily biodegradable.
Biodegradation: 80 %
Exposure time: 28 d
Remarks: Based on data from similar materials

Bioaccumulative potential

Components:

Limonene:

Partition coefficient: n-octanol/water : log Pow: 4.38

Mobility in soil

No data available

Other adverse effects

No data available

Product:

Regulation 40 CFR Protection of Environment; Part 82 Protection of Stratospheric Ozone - CAA Section 602 Class I Substances

Remarks This product neither contains, nor was manufactured with a Class I or Class II ODS as defined by the U.S. Clean Air Act Section 602 (40 CFR 82, Subpt. A, App.A + B).

SECTION 13. DISPOSAL CONSIDERATIONS

Disposal methods

Waste from residues : Dispose of in accordance with local regulations.

Contaminated packaging : Dispose of as unused product.
Empty containers should be taken to an approved waste handling site for recycling or disposal.

SECTION 14. TRANSPORT INFORMATION

International Regulation

IATA-DGR

Not regulated as a dangerous good

IMDG-Code

Not regulated as a dangerous good

National Regulations

SAFETY DATA SHEET

Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Version: 1.0 | UN Number: 30002 | 05/14 | Revision Date: 05/03/17

49 CFR

Not regulated as a dangerous good

SECTION 15. REGULATORY INFORMATION

EPCRA - Emergency Planning and Community Right-to-Know Act

CERCLA Reportable Quantity

This material does not contain any components with a CERCLA RQ.

SARA 304 Extremely Hazardous Substances Reportable Quantity

This material does not contain any components with a section 304 EHS RQ.

SARA 311/312 Hazards : No SARA Hazards

SARA 302 : No chemicals in this material are subject to the reporting requirements of SARA Title III, Section 302.

SARA 313 : This material does not contain any chemical components with known CAS numbers that exceed the threshold (De Minimis) reporting levels established by SARA Title III, Section 313.

Clean Air Act

This product does not contain any hazardous air pollutants (HAP), as defined by the U.S. Clean Air Act Section 12 (40 CFR 61).

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 112(r) for Accidental Release Prevention (40 CFR 68.130, Subpart F).

This product does not contain any chemicals listed under the U.S. Clean Air Act Section 111 SOCM Intermediate or Final VOC's (40 CFR 60.489).

This product does not contain any VOC exemptions listed under the U.S. Clean Air Act Section 450.

Clean Water Act

This product does not contain any toxic pollutants listed under the U.S. Clean Water Act Section 307

US State Regulations

Massachusetts Right To Know

C11-15 Alkane/cycloalkane 64742-47-8 5 - 10 %

Pennsylvania Right To Know

Water (Aqua) 7732-18-5 70 - 90 %

Pumice 1332-09-8 5 - 10 %

C11-15 Alkane/cycloalkane 64742-47-8 5 - 10 %

New Jersey Right To Know

Water (Aqua) 7732-18-5 70 - 90 %

Pumice 1332-09-8 5 - 10 %

C11-15 Alkane/cycloalkane 64742-47-8 5 - 10 %

California Prop 65

This product does not contain any chemicals known to State of California to cause cancer, birth defects, or any other reproductive harm.

The components of this product are reported in the following inventories:

TSCA : On TSCA Inventory

SAFETY DATA SHEET

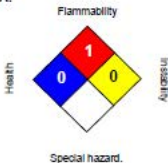
Uline Tuff Scrub™ Orange Pumice Hand Cleaner

Revision 11 (October 2000/00460) Revision Date: 09/19/17

CH INV	: On the inventory, or in compliance with the inventory
AICS	: On the inventory, or in compliance with the inventory
DSL	: All components of this product are on the Canadian DSL.
PICCS	: On the inventory, or in compliance with the inventory
ENCS	: On the inventory, or in compliance with the inventory
IECSC	: On the inventory, or in compliance with the inventory
ISHL	: On the inventory, or in compliance with the inventory
NZIoC	: On the inventory, or in compliance with the inventory
KECI	: On the inventory, or in compliance with the inventory

Inventories

AICS (Australia), DSL (Canada), IECSC (China), REACH (European Union), ENCS (Japan), ISHL (Japan), KECI (Korea), NZIoC (New Zealand), PICCS (Philippines), TCSI (Taiwan), TSCA (USA)

SECTION 16. OTHER INFORMATION**Further information****NFPA:****HMS III:**

HEALTH	0
FLAMMABILITY	1
PHYSICAL HAZARD	0

0 = not significant, 1 = Slight,
2 = Moderate, 3 = High
4 = Extreme, * = Chronic

Revision Date : 09/19/2017

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

Product Number: 5F1AD
Issuing Date: February 9, 2017

Product Name: Clean Scent Liquid Dish Soap
Revision Date: None
Revision Number: 0

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

Safety Data Sheet



The supplier identified below generated this SDS using the UL SDS template. UL did not test, certify, or approve the substance described in this SDS, and all information in this SDS was provided by the supplier or was reproduced from publicly available regulatory data sources. UL makes no representations or warranties regarding the completeness or accuracy of the information in this SDS and disclaims all liability in connection with the use of this information or the substance described in this SDS. The layout, appearance and format of this SDS is © 2014 UL LLC. All rights reserved.

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier

Product Name 5F1AD Clean Scent Liquid Dish Soap

Other means of identification

Synonyms None

Recommended use of the chemical and restrictions on use

Recommended Use Liquid Dishwashing Soap

Uses advised against Use only as directed.

Details of the supplier of the safety data sheet

Distributor Name Uline Shipping Supplies

Distributor Address 12575 Uline Drive
Pleasant Prairie, WI 53158

Distributor Phone Number Phone: 1-800-295-5510

Emergency telephone number Chemtrec: 1-800-424-9300 (24-Hour)



Product Number: 5F1AD

Product Name: Clean Scent Liquid Dish Soap

Issuing Date: February 8, 2017

Revision Date: None

Revision Number: 0

2. HAZARDS IDENTIFICATION


Classification

This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Skin corrosion/irritation	Category 2
Serious eye damage/eye irritation	Category 1

GHS Label elements, including precautionary statements

Emergency Overview

Signal word:	Danger	
Hazard Statements	Causes skin irritation Causes serious eye damage	
		
Appearance:	Clear, Blue, Slightly Viscous Liquid	Physical state: Slightly Viscous Liquid
		Odor: Floral, Soapy

Precautionary Statements - Prevention

Wash face, hands and any exposed skin thoroughly after handling
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response

Specific treatment (see supplemental first aid instructions on this label)

Eyes

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing
Immediately call a POISON CENTER or doctor/physician

Skin

IF ON SKIN: Wash with plenty of soap and water
If skin irritation occurs: Get medical advice/attention
Take off contaminated clothing and wash before reuse

Precautionary Statements - Storage

None

Precautionary Statements - Disposal

None

Hazards not otherwise classified (HNOC)

Not applicable

Unknown Toxicity

2.926 % of the mixture consists of ingredient(s) of unknown toxicity

Other information

Toxic to aquatic life with long lasting effects

Interactions with Other Chemicals

No information available.



Product Number: 5F1AD

Product Name: Clean Scent Liquid Dish Soap

Issuing Date: Februar 9, 2017

Revision Date: None

Revision Number: 0

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical name	CAS No	Weight-%	Trade Secret
Proprietary Formulation	Proprietary	50 - 100	*
Sodium C14-16 Olefin Sulfonate	68439-67-6	10 - 50	*
Sodium Lauryl Sulfate	151-21-3	0 - 10	*
Sodium Xylenesulfonate	1300-72-7	0 - 10	*
Phenoxyethanol	122-99-6	0 - 10	*
Sodium Chloride	7647-14-5	0 - 10	*
Citric Acid	77-92-9	0 - 10	*

*The exact percentage (concentration) of composition has been withheld as a trade secret

4. FIRST AID MEASURES**First aid measures****General Advice**

Show this safety data sheet to the doctor in attendance. Immediate medical attention is required.

Eye contact

Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Keep eye wide open while rinsing. Remove contact lenses, if present and easy to do. Continue rinsing. Do not rub affected area. Seek immediate medical attention/advice.

Skin contact

Wash off immediately with soap and plenty of water for at least 15 minutes. Get medical attention if irritation develops and persists.

Inhalation

Remove to fresh air.

Ingestion

Rinse mouth immediately and drink plenty of water. Never give anything by mouth to an unconscious person. Do NOT induce vomiting. Call a physician.

Self-protection of the first aider

Avoid contact with skin, eyes or clothing. Use personal protective equipment as required. Wear personal protective clothing (see section 8).

Most important symptoms and effects, both acute and delayed**Most Important Symptoms and Effects** Burning sensation.**Indication of any immediate medical attention and special treatment needed****Notes to Physician** Treat symptomatically.**5. FIRE-FIGHTING MEASURES****Suitable Extinguishing Media**

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media

CAUTION: Use of water spray when fighting fire may be inefficient.

Specific hazards arising from the chemical

No information available.

Uniform Fire CodeIrritant: Liquid
Sensitizer: Liquid**Explosion Data****Sensitivity to Mechanical Impact** None.**Sensitivity to Static Discharge** None.**Protective equipment and precautions for firefighters**

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.



6. ACCIDENTAL RELEASE MEASURESPersonal precautions, protective equipment and emergency procedures

Personal precautions Avoid contact with skin, eyes or clothing. Ensure adequate ventilation. Use personal protective equipment as required.

Other Information Refer to protective measures listed in Sections 7 and 8.

Environmental precautions

Environmental precautions Prevent further leakage or spillage if safe to do so.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Soak up with inert absorbent material. Pick up and transfer to properly labeled containers.

7. HANDLING AND STORAGEPrecautions for safe handling

Handling Handle in accordance with good industrial hygiene and safety practice. Avoid contact with skin, eyes or clothing. Do not eat, drink or smoke when using this product.

Conditions for safe storage, including any incompatibilities

Storage Keep containers tightly closed in a dry, cool and well-ventilated place. Store locked up. Keep out of the reach of children.

Incompatible Products Strong acids. Strong oxidizing agents. Strong bases.

8. EXPOSURE CONTROLS/PERSONAL PROTECTIONControl parameters

Exposure Guidelines There is no exposure data pertaining to the Product. This section reflects exposure data pertaining to individual ingredients.

Other Exposure Guidelines Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992)

Appropriate engineering controls

Engineering Measures Showers
Eyewash stations
Ventilation systems

Individual protection measures, such as personal protective equipment

Eye/face protection Tight sealing safety goggles.

Skin and body protection Wear protective gloves and protective clothing. Long sleeved clothing. Impervious gloves.

Respiratory protection If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

Hygiene Measures Handle in accordance with good industrial hygiene and safety practice. Avoid contact with skin, eyes or clothing. Wear suitable gloves and eye/face protection. Do not eat, drink or smoke when using this product.

Product Number: 5F1AD

Product Name: Clean Scent Liquid Dish Soap

Issuing Date: February 8, 2017

Revision Date: None

Revision Number: 0

9. PHYSICAL AND CHEMICAL PROPERTIES

Physical and Chemical Properties

Physical state	Slightly Viscous Liquid		
Appearance	Clear, Blue, Slightly Viscous Liquid	Odor	Floral, Soapy
Color	Blue	Odor Threshold	No information available
<u>Property</u>	<u>Values</u>	<u>Remarks</u>	<u>Method</u>
pH	8.5	None known	
Melting / freezing point	No data available	None known	
Boiling point / boiling range	No data available	None known	
Flash Point	No data available	None known	
Evaporation Rate	No data available	None known	
Flammability (solid, gas)	No data available	None known	
Flammability Limit in Air			
Upper flammability limit	No data available		
Lower flammability limit	No data available		
Vapor pressure	No data available	None known	
Vapor density	No data available	None known	
Specific Gravity	1.03	None known	
Water Solubility	Miscible in water	None known	
Solubility in other solvents	No data available	None known	
Partition coefficient: n-octanol/water	0	None known	
Autoignition temperature	No data available	None known	
Decomposition temperature	No data available	None known	
Kinematic viscosity	No data available	None known	
Dynamic viscosity	No data available	None known	
Explosive properties	No data available		
Oxidizing properties	No data available		
<u>Other Information</u>			
Softening Point	No data available		
VOC Content (%)	No data available		
Particle Size	No data available		
Particle Size Distribution	No data available		

10. STABILITY AND REACTIVITY

Reactivity

No data available.

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Hazardous Polymerization

Hazardous polymerization does not occur.

Conditions to avoid

None known based on information supplied.

Incompatible materials

Strong acids. Strong oxidizing agents. Strong bases.

Hazardous Decomposition Products

None known.

When used in accordance with the directions.



Product Number: 5F1AD

Product Name: Clean Scent Liquid Dish Soap

Issuing Date: February 8, 2017

Revision Date: None

Revision Number: 0

11. TOXICOLOGICAL INFORMATION

There is no data for this product. The information included in this section describes the potential hazards of the individual ingredients.

Information on likely routes of exposure

Product Information

Inhalation	Specific test data for the substance or mixture is not available.
Eye contact	Specific test data for the substance or mixture is not available.
Skin contact	Specific test data for the substance or mixture is not available.
Ingestion	Specific test data for the substance or mixture is not available.

Component Information

Chemical name	Oral LD50	Dermal LD50	Inhalation LC50
Water 7732-18-5	> 90 mL/kg (Rat)	-	-
Sodium C14-16 Olefin Sulfonate 68439-57-6	= 2220 mg/kg (Rat)	> 740 mg/kg (Rabbit)	-
Sodium Lauryl Sulfate 151-21-3	= 1288 mg/kg (Rat)	= 200 mg/kg (Rabbit)	> 3900 mg/m ³ (Rat) 1 h
Sodium Xylenesulfonate 1300-72-7	= 1000 mg/kg (Rat)	-	-
Phenoxyethanol 122-99-6	= 1260 mg/kg (Rat)	= 5 mL/kg (Rabbit)	-
Sodium Chloride 7647-14-5	= 3 g/kg (Rat)	> 10 g/kg (Rabbit)	> 42 g/m ³ (Rat) 1 h
Citric Acid 77-92-9	= 3000 mg/kg (Rat) = 3 g/kg (Rat)	-	-

Information on toxicological effects

Symptoms Erythema (skin redness). May cause redness and tearing of the eyes. May cause blindness. Burning.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization	No information available.
Mutagenic Effects	No information available.
Carcinogenicity	There are no ingredients listed as a carcinogen.
Reproductive toxicity	No information available.
STOT - single exposure	No information available.
STOT - repeated exposure	No information available.
Target Organ Effects	Eyes. Kidney. Respiratory system. Skin. Liver.
Aspiration Hazard	No information available.

Numerical measures of toxicity Product Information

The following values are calculated based on chapter 3.1 of the GHS document

ATEmix (oral)
5,494.00 mg/kg
ATEmix (dermal)
7,117.00 mg/kg (ATE)



Product Number: 5F1AD

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Issuing Date: February 8, 2017

Revision Date: None

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Alabama Public Records Law (S 36-12-40, et seq., Code of Alabama)

12. ECOLOGICAL INFORMATION

There is no ecological data on the Product. The Product ingredients are expected to be safe for the environment at concentrations predicted under normal use and accidental spill scenarios. Packaging components are compatible with the conventional solid waste management practices.

Ecotoxicity

Toxic to aquatic life with long lasting effects.

Persistence and Degradability

No information available.

Bioaccumulation

No information available.

Other adverse effects

No information available.

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal methods

This material, as supplied, is not a hazardous waste according to Federal regulations (40 CFR 261). This material could become a hazardous waste if it is mixed with or otherwise comes in contact with a hazardous waste, if chemical additions are made to this material, or if the material is processed or otherwise altered. Consult 40 CFR 261 to determine whether the altered material is a hazardous waste. Consult the appropriate state, regional, or local regulations for additional requirements.

Contaminated Packaging

Dispose of contents/containers in accordance with local regulations.

California Hazardous Waste Codes 561

This product contains one or more substances that are listed with the State of California as a hazardous waste.

14. TRANSPORT INFORMATION

DOT

Proper Shipping Name
Hazard Class

NOT REGULATED
NON REGULATED
N/A

TDG

Not regulated

MEX

Not regulated

ICAO

Not regulated

IATA

Proper Shipping Name
Hazard Class

Not regulated
NON REGULATED
N/A

IMDG/IMO

Hazard Class
Marine Pollutant

Not regulated
N/A
Product is a marine pollutant according to the criteria set by IMDG/IMO

RID

Not regulated

ADR

Not regulated

ADN

Not regulated



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Issuing Date: February 8, 2017

Product Name: Clean Scent Liquid Dish Soap
Revision Date: None
Revision Number: 0

Alabama Public Records Law (6, 36-12-40, et seq., Code of Alabama 1975)
15. REGULATORY INFORMATION

International Inventories

TSCA Not determined
DSL Not determined

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical name	CAS No	Weight-%	SARA 313 - Threshold Values %
Phenoxyethanol - 122-99-6	122-99-6	0 - 10	1.0

SARA 311/312 Hazard Categories

Acute Health Hazard Yes
Chronic Health Hazard No
Fire Hazard No
Sudden release of pressure hazard No
Reactive Hazard No

CWA (Clean Water Act)

This product does not contain any substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302)

Chemical name	Hazardous Substances RQs	Extremely Hazardous Substances RQs	RQ
Citric Acid 77-92-9			RQ Section number 180.950

US State Regulations

California Proposition 65 - NONE

This product does not contain any Proposition 65 chemicals.

U.S. State Right-to-Know Regulations

Chemical name	New Jersey	Massachusetts	Pennsylvania	Rhode Island	Illinois
Phenoxyethanol 122-99-6	X		X	X	X

International Regulations

Mexico

National occupational exposure limits

Canada

WHMIS Hazard Class

Not determined



Product Number: 5F1AD

Product Name: Clean Scent Liquid Dish Soap

Issuing Date: February 8, 2017

Revision Date: None

Revision Number: 0

Alabama Public Records Law (S 36-12-40, et seq., Code of Alabama)

16. OTHER INFORMATION

NFPA	Health Hazards	3	Flammability	0	Instability	0	Physical and Chemical Hazards	-
HMIS	Health Hazards	3	Flammability	0	Physical Hazard	0	N/A	Personal Protection
								X

Prepared By Product Stewardship
23 British American Blvd.
Latham, NY 12110
1-800-572-8501

Issuing Date February 8, 2017

Revision Date None

Revision Note None

General Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

Disclaimer:

The information and recommendations contained in the Safety Data Sheet (SDS) are supplied pursuant to 29 CFR 1910.1200 of the Occupational Safety and Health Standards Hazard Communication Rule. The information and recommendations set forth herein are presented in good faith and believed to be correct as of this date hereof.

We, however, make no representation as to the completeness or accuracy thereof, and information is supplied upon the express condition that the persons receiving the information will be required to make their own determination as to its suitability for their purposes prior to use. In no event will we be responsible for any damages of any nature whatsoever resulting from the use of, reliance upon, or the misuse of this information.

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Product manufactured for sale in the United States only. We make no representations or warranties regarding compliance with any regulations or laws of any other country.

End of Safety Data Sheet



Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama)

SAFETY DATA SHEET

1. Identification

Product identifier: S-22344 ULINE FOAMING GLASS CLEANER

Other means of identification

SDS number: RE1000037281

Recommended restrictions

Product Use: Cleaner

Restrictions on use: Not known.

Manufacturer/Importer/Distributor Information

Manufacturer

Company Name: Uline, Inc.
Address: 12575 Uline Drive
Pleasant Prairie, WI 53158
Telephone: 1-800-295-5510
Fax:

Emergency telephone number: 1-888-836-8855

2. Hazard(s) identification

Hazard Classification

Physical Hazards

Gases under pressure

Compressed gas

Label Elements

Hazard Symbol:



Signal Word:

Warning

Hazard Statement:

Contains gas under pressure; may explode if heated.

Precautionary Statements

Storage:

Protect from sunlight. Store in a well-ventilated place.

Hazard(s) not otherwise classified (HNOC):

None.

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama)

3. Composition/information on ingredients

Mixtures

Chemical Identity	CAS number	Content in percent (%)*
Ethanol	64-17-5	1 - <5%
Ethanol, 2-butoxy-	111-76-2	1 - <5%
Propane	74-98-6	1 - <5%
Butane	106-97-8	1 - <5%

* All concentrations are percent by weight unless ingredient is a gas. Gas concentrations are in percent by volume.

4. First-aid measures

Ingestion:	Call a POISON CENTER/doctor if you feel unwell. Rinse mouth.
Inhalation:	Move to fresh air.
Skin Contact:	Wash skin thoroughly with soap and water. If skin irritation occurs: Get medical advice/attention.
Eye contact:	Any material that contacts the eye should be washed out immediately with water. If easy to do, remove contact lenses. If eye irritation persists: Get medical advice/attention.

Most important symptoms/effects, acute and delayed

Symptoms: No data available.

Hazards: No data available.

Indication of immediate medical attention and special treatment needed

Treatment: No data available.

5. Fire-fighting measures

General Fire Hazards: Use water spray to keep fire-exposed containers cool. Fight fire from a protected location. Stop flow of gas. Move containers from fire area if you can do so without risk.

Suitable (and unsuitable) extinguishing media

Suitable extinguishing media: Use fire-extinguishing media appropriate for surrounding materials.

Unsuitable extinguishing media: Do not use water jet as an extinguisher, as this will spread the fire.

Specific hazards arising from the chemical: Pressurized container may explode when exposed to heat or flame.

Special protective equipment and precautions for firefighters

Special fire fighting procedures:

No data available.

Special protective equipment for fire-fighters:

Firefighters must use standard protective equipment including flame retardant coat, helmet with face shield, gloves, rubber boots, and in enclosed spaces, SCBA.

6. Accidental release measures

Personal precautions, protective equipment and emergency procedures:

No data available.

Methods and material for containment and cleaning up:

Stop the flow of material, if this is without risk. Absorb with sand or other inert absorbent.

Environmental Precautions:

Avoid release to the environment. Prevent further leakage or spillage if safe to do so. Do not contaminate water sources or sewer. Environmental manager must be informed of all major spillages.

7. Handling and storage

Precautions for safe handling:

Provide adequate ventilation. Wear appropriate personal protective equipment. Observe good industrial hygiene practices.

Conditions for safe storage, including any incompatibilities:

Protect from sunlight. Store in a cool place. Aerosol Level 1

8. Exposure controls/personal protection

Control Parameters

Occupational Exposure Limits

Chemical Identity	Type	Exposure Limit Values	Source
Ethanol	TWA PEL	1,000 ppm 1,900 mg/m ³	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	REL	1,000 ppm 1,900 mg/m ³	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	PEL	1,000 ppm 1,900 mg/m ³	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	TWA	1,000 ppm 1,900 mg/m ³	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	TWA	1,000 ppm 1,900 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	STEL	1,000 ppm	US. ACGIH Threshold Limit Values (2009)
	AN ESL	1,880 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL	10,000 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL	1,000 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)

	ST ESL		18,800 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	TWA	25 ppm	120 mg/m ³	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	REL	5 ppm	24 mg/m ³	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	PEL	50 ppm	240 mg/m ³	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	TWA PEL	20 ppm	97 mg/m ³	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	TWA	25 ppm	120 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	AN ESL		760 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL		3,700 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL		2,900 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL		600 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
Propane	REL	1,000 ppm	1,800 mg/m ³	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	PEL	1,000 ppm	1,800 mg/m ³	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	TWA PEL	1,000 ppm	1,800 mg/m ³	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	TWA	1,000 ppm	1,800 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	TWA	1,000 ppm	1,800 mg/m ³	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
Butane	REL	800 ppm	1,900 mg/m ³	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	TWA	800 ppm	1,900 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	STEL	1,000 ppm		US. ACGIH Threshold Limit Values (03 2018)
	TWA	800 ppm	1,900 mg/m ³	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	AN ESL		3,000 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL		7,100 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	TWA PEL	800 ppm	1,900 mg/m ³	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	ST ESL		66,000 µg/m ³	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL		28,000 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
2-Propanol, 2-methyl-	TWA	100 ppm	300 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	STEL	150 ppm	450 mg/m ³	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	ST ESL		200 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL		20 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL		62 µg/m ³	US. Texas. Effects Screening Levels (Texas

			Commission on Environmental Quality) (11 2016)
	ST ESL	620 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	STEL	150 ppm 450 mg/m3	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	TWA	100 ppm 300 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	PEL	100 ppm 300 mg/m3	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	TWA	100 ppm	US. ACGIH Threshold Limit Values (2008)
	STEL	150 ppm 450 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	STEL	150 ppm 450 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	TWA PEL	100 ppm 300 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	REL	100 ppm 300 mg/m3	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
Acetic acid, phenylmethyl ester	ST ESL	100 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL	10 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL	610 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL	61 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	TWA PEL	10 ppm 61 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	TWA	10 ppm	US. ACGIH Threshold Limit Values (2008)
1,2-Benzenedi-carboxylic acid, 1,2-diethyl ester	REL	5 mg/m3	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	TWA	5 mg/m3	US. ACGIH Threshold Limit Values (2008)
	TWA PEL	5 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	TWA	5 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	TWA	5 mg/m3	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	ST ESL	50 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL	5 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
Benzene, 1,1'-oxybis-- Vapor.	STEL	2 ppm	US. ACGIH Threshold Limit Values (03 2018)
	TWA	1 ppm	US. ACGIH Threshold Limit Values (03 2018)
	PEL	1 ppm 7 mg/m3	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	TWA PEL	1 ppm 7 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	REL	1 ppm 7 mg/m3	US. NIOSH: Pocket Guide to Chemical Hazards (2005)
	TWA	1 ppm 7 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
Benzene, 1,1'-oxybis-	ST ESL	70 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL	7 µg/m3	US. Texas. Effects Screening Levels (Texas

Chemical Identity	Exposure Limit Values	Source
Benzene, 1,1'-oxybis-	ST ESL 10 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL 1 ppb	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
Ethanone, 1-phenyl-	TWA 10 ppm 50 mg/m3	US. OARS. WEELs Workplace Environmental Exposure Level Guide (2007)
	ST ESL 490 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	TWA 10 ppm	US. ACGIH Threshold Limit Values (2006)
	TWA PEL 10 ppm 49 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	AN ESL 49 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL 100 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL 10 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
Stoddard solvent	TWA 100 ppm	US. ACGIH Threshold Limit Values (2006)
	REL 350 mg/m3	US. NIOSH. Pocket Guide to Chemical Hazards (2005)
	PEL 500 ppm 2,900 mg/m3	US. OSHA Table Z-1 Limits for Air Contaminants (29 CFR 1910.1000) (02 2006)
	Cell_Time 1,800 mg/m3	US. NIOSH. Pocket Guide to Chemical Hazards (2005)
	TWA PEL 100 ppm 525 mg/m3	US. California Code of Regulations, Title 8, Section 5155. Airborne Contaminants (09 2006)
	AN ESL 350 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	TWA 100 ppm 525 mg/m3	US. Tennessee. OELs. Occupational Exposure Limits, Table Z1A (06 2008)
	TWA 100 ppm 525 mg/m3	US. OSHA Table Z-1-A (29 CFR 1910.1000) (1989)
	ST ESL 3,500 µg/m3	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	ST ESL 670 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)
	AN ESL 67 ppb	US. Texas. Effects Screening Levels (Texas Commission on Environmental Quality) (11 2016)

Biological Limit Values

Chemical Identity	Exposure Limit Values	Source
Ethanol, 2-butoxy- (Butoxyacetic acid (BAA), with hydrolysis: Sampling time: End of shift.)	200 mg/g (Creatinine in urine)	ACGIH BEL (03 2013)

Appropriate Engineering
Controls

No data available.

Individual protection measures, such as personal protective equipment

General information:

Use personal protective equipment as required. Personal protection equipment should be chosen according to the CEN standards and in discussion with the supplier of the personal protective equipment.

Eye/face protection: Wear goggles/face shield.

Skin Protection

Hand Protection: No data available.

Other: No data available.

Respiratory Protection: In case of inadequate ventilation use suitable respirator. Seek advice from local supervisor.

Hygiene measures: Observe good industrial hygiene practices.

9. Physical and chemical properties

Appearance

Physical state: liquid

Form: Spray Aerosol

Color: No data available.

Odor: No data available.

Odor threshold: No data available.

pH: 9.1 - 10.1

Melting point/freezing point: No data available.

Initial boiling point and boiling range: Estimated 100 °C

Flash Point: No data available.

Evaporation rate: No data available.

Flammability (solid, gas): Non-flammable Aerosol

Upper/lower limit on flammability or explosive limits

Flammability limit - upper (%): No data available.

Flammability limit - lower (%): No data available.

Explosive limit - upper (%): No data available.

Explosive limit - lower (%): No data available.

Vapor pressure: 551 - 689 kPa (21 °C)

Vapor density: No data available.

Density: 0.97 g/cm³

Relative density: No data available.

Solubility(ies)

Solubility in water: No data available.

Solubility (other): No data available.

Partition coefficient (n-octanol/water): No data available.

Auto-ignition temperature: No data available.

Decomposition temperature: No data available.

Viscosity: No data available.

10. Stability and reactivity

Reactivity:	No data available.
Chemical Stability:	Material is stable under normal conditions.
Possibility of hazardous reactions:	No data available.
Conditions to avoid:	Avoid heat or contamination.
Incompatible Materials:	No data available.
Hazardous Decomposition Products:	No data available.

11. Toxicological information**Information on likely routes of exposure**

Inhalation:	No data available.
Skin Contact:	No data available.
Eye contact:	No data available.
Ingestion:	No data available.

Symptoms related to the physical, chemical and toxicological characteristics

Inhalation:	No data available.
Skin Contact:	No data available.
Eye contact:	No data available.
Ingestion:	No data available.

Information on toxicological effects**Acute toxicity (list all possible routes of exposure)**

Oral Product:	ATEmix: 60,310.88 mg/kg
Dermal Product:	ATEmix: 23,039.72 mg/kg
Inhalation Product:	ATEmix: 690.85 mg/l ATEmix : 172.71 mg/l

Repeated dose toxicity Product:	No data available.
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Skin Corrosion/Irritation

Product: No data available.

Serious Eye Damage/Eye Irritation

Product: No data available.

Respiratory or Skin Sensitization

Product: No data available.

Carcinogenicity

Product: No data available.

IARC Monographs on the Evaluation of Carcinogenic Risks to Humans:

No carcinogenic components identified

US. National Toxicology Program (NTP) Report on Carcinogens:

No carcinogenic components identified

US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050):

No carcinogenic components identified

Germ Cell Mutagenicity

In vitro

Product: No data available.

In vivo

Product: No data available.

Reproductive toxicity

Product: No data available.

Specific Target Organ Toxicity - Single Exposure

Product: No data available.

Specific Target Organ Toxicity - Repeated Exposure

Product: No data available.

Aspiration Hazard

Product: No data available.

Other effects: No data available.

12. Ecological information

Ecotoxicity:

Acute hazards to the aquatic environment:

Fish

Product: No data available.

Aquatic Invertebrates
Product: No data available.

Chronic hazards to the aquatic environment:

Fish
Product: No data available.

Aquatic Invertebrates
Product: No data available.

Toxicity to Aquatic Plants
Product: No data available.

Persistence and Degradability

Biodegradation
Product: No data available.

BOD/COD Ratio
Product: No data available.

Bioaccumulative potential

Bioconcentration Factor (BCF)
Product: No data available.

Partition Coefficient n-octanol / water (log Kow)
Product: No data available.

Mobility in soil: No data available.

Known or predicted distribution to environmental compartments

Ethanol No data available.
Ethanol, 2-butoxy- No data available.
Propane No data available.
Butane No data available.

Other adverse effects: No data available.

13. Disposal considerations

Disposal instructions: Wash before disposal. Dispose to controlled facilities.

Contaminated Packaging: No data available.

14. Transport information

DOT

UN Number:	UN 1950
UN Proper Shipping Name:	Aerosols, non-flammable
Transport Hazard Class(es)	
Class:	2.2
Label(s):	-
Packing Group:	II
Marine Pollutant:	No
Environmental Hazards:	No
Marine Pollutant	No
Special precautions for user:	Not regulated.

IMDG

UN Number:	UN 1950
UN Proper Shipping Name:	Aerosols, non-flammable
Transport Hazard Class(es)	
Class:	2
Label(s):	-
EmS No.:	
Packing Group:	-
Environmental Hazards:	No
Marine Pollutant	No
Special precautions for user:	Not regulated.

IATA

UN Number:	UN 1950
Proper Shipping Name:	Aerosols, non-flammable
Transport Hazard Class(es):	
Class:	2.2
Label(s):	-
Packing Group:	-
Environmental Hazards:	No
Marine Pollutant	No
Special precautions for user:	Not regulated.
Cargo aircraft only:	Allowed.

15. Regulatory information

US Federal Regulations

Restrictions on use: Not known.

TSCA Section 12(b) Export Notification (40 CFR 707, Subpt. D)
US. OSHA Specifically Regulated Substances (29 CFR 1910.1001-1050)
None present or none present in regulated quantities.

CERCLA Hazardous Substance List (40 CFR 302.4):

<u>Chemical Identity</u>	<u>Reportable quantity</u>
Propane	lbs. 100
Butane	lbs. 100
2-Propanol, 2-methyl-	lbs. 100
1,3-Benzodioxole, 5-(2-propen-1-yl)-	lbs. 100
1,2-Benzenedicarboxylic acid, 1,2-diethyl ester	lbs. 1000
Ethanone, 1-phenyl-	lbs. 5000

Superfund Amendments and Reauthorization Act of 1986 (SARA)

Hazard categories

Not listed.

SARA 302 Extremely Hazardous Substance

None present or none present in regulated quantities.

SARA 304 Emergency Release Notification

<u>Chemical Identity</u>	<u>Reportable quantity</u>
Ethanol	lbs. 100
Ethanol, 2-butoxy-	
Propane	lbs. 100
Butane	lbs. 100
2-Propanol, 2-methyl-	lbs. 100
1,3-Benzodioxole, 5-(2-propen-1-yl)-	lbs. 100
1,2-Benzenedicarboxylic acid, 1,2-diethyl ester	lbs. 1000
Ethanone, 1-phenyl-	lbs. 5000

SARA 311/312 Hazardous Chemical

<u>Chemical Identity</u>	<u>Threshold Planning Quantity</u>
Ethanol	10000 lbs
Ethanol, 2-butoxy-	10000 lbs
Propane	10000 lbs
Butane	10000 lbs
2-Propanol, 2-methyl-	10000 lbs
Acetic acid, phenylmethyl ester	10000 lbs
1,2-Benzenedicarboxylic acid, 1,2-diethyl ester	10000 lbs
Benzene, 1,1'-oxybis-	10000 lbs
Ethanone, 1-phenyl-	10000 lbs
Stoddard solvent	10000 lbs

SARA 313 (TRI Reporting)

<u>Chemical Identity</u>	<u>Reporting threshold for other users</u>	<u>Reporting threshold for manufacturing and processing</u>
Ethanol, 2-butoxy-	N230 lbs	N230 lbs.

Clean Air Act (CAA) Section 112(r) Accidental Release Prevention (40 CFR 68.130):

Clean Water Act Section 311 Hazardous Substances (40 CFR 117.3)

US State Regulations

US. California Proposition 65

No ingredient requiring a warning under CA Prop 65.

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama

US. New Jersey Worker and Community Right-to-Know Act

Chemical Identity

Ethanol

Ethanol, 2-butoxy-

Propane

Butane

US. Massachusetts RTK - Substance List

Chemical Identity

1,3-Benzodioxole, 5-(2-propen-1-yl)-

US. Pennsylvania RTK - Hazardous Substances

Chemical Identity

Ethanol

Ethanol, 2-butoxy-

Propane

Butane

US. Rhode Island RTK

No ingredient regulated by RI Right-to-Know Law present.

International regulations

Montreal protocol

Not applicable

Stockholm convention

Not applicable

Rotterdam convention

Not applicable

Kyoto protocol

Not applicable

Inventory Status:
Australia IICG: On or in compliance with the inventory.

EINECS, ELINCS or NLP: On or in compliance with the inventory

Japan (ENCS) List: Not in compliance with the inventory.

China Inv. Existing Chemical Substances: On or in compliance with the inventory

Canada NDSL Inventory: Not in compliance with the inventory.

Philippines PICCS: Not in compliance with the inventory.

US TSCA Inventory: On or in compliance with the inventory

Japan ISHL Listing: Not in compliance with the inventory.

Japan Pharmacopoeia Listing: Not in compliance with the inventory.

Mexico INSQ: Not in compliance with the inventory.

Canada DSL Inventory List: Not in compliance with the inventory.

Korea Existing Chemicals Inv. (KECI): On or in compliance with the inventory

New Zealand Inventory of Chemicals: On or in compliance with the inventory

Ontario Inventory: On or in compliance with the inventory

Taiwan Chemical Substance Inventory: On or in compliance with the inventory

16. Other information, including date of preparation or last revision

Issue Date: 08/21/2019

Revision Information: No data available.

Version #: 1.0

Further Information: No data available.

Disclaimer: This information is provided without warranty. The information is believed to be correct. This information should be used to make an independent determination of the methods to safeguard workers and the environment.



Issue Date 02-Mar-2018

Revision Date 02-Mar-2018

Version 1

1. PRODUCT AND COMPANY IDENTIFICATION

Product identifier

Product Name Toilet Bowl Cleaner Disinfectant

Other means of identification

Product Code S-19372

Synonyms None

Details of the supplier of the safety data sheet

Company Name ULINE
 12575 Uline Drive
 Pleasant Prairie, WI 53158
 (800) 295-5510
<http://www.uline.com/>

Emergency telephone number

Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

ClassificationOSHA Regulatory Status

This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Acute toxicity - Oral	Category 5
Acute toxicity - Dermal	Not classified
Acute toxicity - Inhalation (Gases)	Category 4
Skin corrosion/irritation	Category 1
Serious eye damage/eye irritation	Category 1

Label elementsEmergency Overview

Danger

Hazard statements

May be harmful if swallowed

Harmful if inhaled

Causes severe skin burns and eye damage



Appearance Dark Blue

Physical state Liquid

Odor Fresh Slight Acidic

Precautionary Statements - Prevention

Use in a well-ventilated area

Do not breathe dust/fume/gas/mist/vapors/spray

Wash face, hands and any exposed skin thoroughly after handling

Wear protective gloves/protective clothing/eye protection/face protection

GENERAL PRECAUTION AND RESTRICTIONS: DO NOT MIX WITH CHLORINE, BLEACH, AMMONIA CLEANER OR OTHER HOUSEHOLD CHEMICALS

Precautionary Statements - Response

Specific Treatment (See Section 4 on the SDS)

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower

Wash contaminated clothing before reuse

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Have a person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center. Do not give anything by mouth to an unconscious person. Call a poison control center or doctor immediately for treatment advice.

Precautionary Statements - Storage

Open dumping is prohibited. Store only in original container. Do not reuse container. If a leaky container must be contained within another, mark the outer container to identify the contents. Store pesticide away from food, pet food, feed, seed, fertilizer, and veterinary supplies. Keep this product under locked storage sufficient to make it inaccessible to children or persons unfamiliar with its proper use.

Precautionary Statements - Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Hazards not otherwise classified (HNOC)**Other Information**

Unknown Acute Toxicity

0% of the mixture consists of ingredient(s) of unknown toxicity

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	Weight-%	Trade Secret
Hydrochloric Acid	7647-01-0	5-10	*

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES**First aid measures**

General advice

Immediate medical attention is required.

Skin Contact

Immediate medical attention is required. Wash off immediately with soap and plenty of

water while removing all contaminated clothes and shoes. For minor skin contact, avoid spreading material on unaffected skin. For severe burns, immediate medical attention is required.

Eye contact	Immediate medical attention is required. Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Keep eye wide open while rinsing. Do not rub affected area. Immediately flush with plenty of water. After initial flushing, remove any contact lenses and continue flushing for at least 15 minutes.
Inhalation	Remove to fresh air. Call a physician or poison control center immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen.
Ingestion	Immediate medical attention is required. Do NOT induce vomiting. Drink plenty of water. Never give anything by mouth to an unconscious person. Remove from exposure, lie down. Clean mouth with water and drink afterwards plenty of water. Call a physician or poison control center immediately.
Self-protection of the first aider	Use personal protective equipment as required. Avoid contact with skin, eyes or clothing. Do not use mouth-to-mouth method if victim ingested or inhaled the substance; give artificial respiration with the aid of a pocket mask equipped with a one-way valve or other proper respiratory medical device.

Most important symptoms and effects, both acute and delayed

Symptoms	Any additional important symptoms and effects are described in Section 11: Toxicology Information.
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Indication of any immediate medical attention and special treatment needed

Note to physicians	Product is a corrosive material. Use of gastric lavage or emesis is contraindicated. Possible perforation of stomach or esophagus should be investigated. Do not give chemical antidotes. Asphyxia from glottal edema may occur. Marked decrease in blood pressure may occur with moist rales, frothy sputum, and high pulse pressure. Treat symptomatically.
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5. FIRE-FIGHTING MEASURES

Suitable extinguishing media

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media Caution: Use of water spray when fighting fire may be inefficient.

Specific hazards arising from the chemical

The product causes burns of eyes, skin and mucous membranes. Thermal decomposition can lead to release of irritating and toxic gases and vapors. In the event of fire and/or explosion do not breathe fumes.

Explosion data

Sensitivity to Mechanical Impact None.

Sensitivity to Static Discharge None.

Protective equipment and precautions for firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions	Evacuate personnel to safe areas. Use personal protective equipment as required. Avoid contact with skin, eyes or clothing. Keep people away from and upwind of spill/leak.
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Environmental precautions

Environmental precautions	Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other water unless in accordance with the requirements of a National Pollutant
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Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

discharge elimination system (NPDES) permit and the permitting authority has been notified in writing prior to the discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State water board or Regional office of the EPA.

Methods and material for containment and cleaning up.

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Dike far ahead of liquid spill for later disposal. Soak up with inert absorbent material. Take up mechanically, placing in appropriate containers for disposal. Clean contaminated surface thoroughly. Prevent product from entering drains. Dam up. After cleaning, flush away traces with water.

7. HANDLING AND STORAGE**Precautions for safe handling**

Advice on safe handling Use personal protective equipment as required. Avoid contact with skin, eyes or clothing. Ensure adequate ventilation, especially in confined areas. In case of insufficient ventilation, wear suitable respiratory equipment. Use only with adequate ventilation and in closed systems. Avoid breathing vapors or mists. Always add acid to water.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep out of the reach of children. Do not contaminate food or feed stuffs. Keep/store only in original container. Keep container tightly closed in a dry and well-ventilated place. Keep in properly labeled containers.

Incompatible materials Incompatible with strong acids and bases. Incompatible with oxidizing agents. Strong bases. Ammonia. Chlorinated compounds. Contact with metals may evolve flammable hydrogen gas. Metals.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION**Control parameters****Exposure Guidelines**

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Hydrochloric Acid 7647-01-0	Ceiling: 2 ppm	(vacated) Ceiling: 5 ppm (vacated) Ceiling: 7 mg/m ³ Ceiling: 5 ppm Ceiling: 7 mg/m ³	IDLH: 50 ppm Ceiling: 5 ppm Ceiling: 7 mg/m ³
Ethanol 64-17-5	STEL: 1000 ppm	TWA: 1000 ppm TWA: 1900 mg/m ³ (vacated) TWA: 1000 ppm (vacated) TWA: 1900 mg/m ³	IDLH: 3300 ppm TWA: 1000 ppm TWA: 1900 mg/m ³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers, Eyewash stations & Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Tight sealing safety goggles. Wear a face shield if splashing hazard exists.

Skin and body protection Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.

Respiratory protection If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be

required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene

When using do not eat, drink or smoke. Keep away from food, drink and animal feeding stuffs. Contaminated work clothing should not be allowed out of the workplace. Regular cleaning of equipment, work area and clothing is recommended. Avoid contact with skin, eyes or clothing. Take off all contaminated clothing and wash it before reuse. Wear suitable gloves and eye/face protection.

9. PHYSICAL AND CHEMICAL PROPERTIES
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Information on basic physical and chemical properties

Physical state	Liquid
Appearance	Dark Blue
Color	Dark Blue
Odor	Fresh Slight Acidic
Odor threshold	No Information available

<u>Property</u>	<u>Values</u>	<u>Remarks • Method</u>
pH	<1	
Specific Gravity	1.04	
Viscosity	Viscous	
Melting point/freezing point	No Information available	
Flash point	None	
Boiling point / boiling range	212 °F	
Evaporation rate	No Information available	
Flammability (solid, gas)	No data available	
Flammability Limits in Air		
Upper flammability limit:	No Information available	
Lower flammability limit:	No Information available	
Vapor pressure	No Information available	
Vapor density	No Information available	
Water solubility	Complete	
Partition coefficient	No Information available	
Autoignition temperature	No Information available	
Decomposition temperature	No Information available	

Other Information

Density Lbs/Gal	8.66
VOC Content (%)	0.01

10. STABILITY AND REACTIVITY

Reactivity

No data available

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Conditions to avoid

Exposure to air or moisture over prolonged periods.

Incompatible materials

Incompatible with strong acids and bases. Incompatible with oxidizing agents. Strong bases. Ammonia. Chlorinated compounds. Contact with metals may evolve flammable hydrogen gas. Metals.

Hazardous Decomposition Products

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

Thermal decomposition can lead to release of irritating and toxic gases and vapors. Hydrogen chloride. Chlorine gas. Thermal decomposition can lead to release of toxic/corrosive gases and vapors. Hydrogen.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure

Product Information	The primary effects and toxicity of this material are due to its corrosive nature.
Inhalation	Harmful if inhaled. Breathing of vapor can cause respiratory irritation and inflammation. Breathing of mist or liquid can cause burns to the respiratory tract.
Eye contact	Avoid contact with eyes. Corrosive to the eyes and may cause severe damage including blindness.
Skin Contact	Avoid contact with skin. Corrosive. Contact with skin may cause severe irritation and burns.
Ingestion	May be harmful if swallowed. Ingestion causes acute irritation and burns to the mucous membranes of the mouth, trachea, esophagus and stomach.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
Hydrochloric Acid 7647-01-0	~ 700 mg/kg (Rat)	> 5010 mg/kg (Rabbit)	~ 1.68 mg/L (Rat) 1 h

Information on toxicological effects

Symptoms No Information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Corrosivity	Causes burns. Extremely corrosive and destructive to tissue. Risk of serious damage to eyes.
Sensitization	No Information available.
Germ cell mutagenicity	No Information available.
Carcinogenicity	The table below indicates whether each agency has listed any ingredient as a carcinogen. Ethanol has been shown to be carcinogenic in long-term studies only when consumed as alcoholic beverage.

Chemical Name	ACGIH	IARC	NTP	OSHA
Hydrochloric Acid 7647-01-0	-	Group 3	-	X

IARC (International Agency for Research on Cancer)

Group 3 -Not classifiable as a human carcinogen

OSHA (Occupational Safety and Health Administration of the US Department of Labor)

X - Present

Reproductive toxicity	No Information available.
STOT - single exposure	No Information available.
STOT - repeated exposure	No Information available.
Chronic toxicity	Chronic exposure to corrosive fumes/gases may cause erosion of the teeth followed by jaw necrosis. Bronchial irritation with chronic cough and frequent attacks of pneumonia are common. Gastrointestinal disturbances may also be seen. Ethanol has been shown to be a reproductive toxin only when consumed as an alcoholic beverage. Ethanol has been shown to be carcinogenic in long-term studies only when consumed as alcoholic beverage. Avoid repeated exposure. Possible risk of irreversible effects.
Target organ effects	EYES, Respiratory system, Skin.
Aspiration hazard	No Information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 0% of the mixture consists of ingredient(s) of unknown toxicity

The following values are calculated based on chapter 3.1 of the GHS document .

ATEmix (oral)	2,605.00
ATEmix (dermal)	50,091.00
ATEmix (inhalation-gas)	6,166.42
ATEmix (inhalation-dust/mist)	5.48

12. ECOLOGICAL INFORMATION

Ecotoxicity

3.25% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
Hydrochloric Acid 7647-01-0	-	282: 96 h <i>Gambusia affinis</i> mg/L LC50 static	-
Alkyl (C12-16) dimethyl benzy ammonium chloride 68424-85-1	-	0.223 - 0.46: 96 h <i>Lepomis macrochirus</i> mg/L LC50 static 1.3; 96 h <i>Poecilia reticulata</i> mg/L LC50 semi-static 2.4; 96 h <i>Oryzias latipes</i> mg/L LC50 semi-static 0.823 - 1.61; 96 h <i>Oncorhynchus mykiss</i> mg/L LC50 static	-
Ethanol 64-17-5	-	12.0 - 16.0: 96 h <i>Oncorhynchus mykiss</i> mL/L LC50 static 100; 96 h <i>Pimephales promelas</i> mg/L LC50 static 13400 - 15100; 96 h <i>Pimephales promelas</i> mg/L LC50 flow-through	9268 - 14221: 48 h <i>Daphnia magna</i> mg/L LC50 10800; 24 h <i>Daphnia magna</i> mg/L EC50 2: 48 h <i>Daphnia magna</i> mg/L EC50 Static

Persistence and degradability

No Information available.

Bioaccumulation

No Information available.

Other adverse effects

No Information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes can not be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Contaminated packaging

Nonrefillable container. Do not reuse or refill this container. Clean container promptly after emptying. Triple rinse empty container with water. Then offer for recycling or reconditioning. If not available, puncture and dispose in a sanitary landfill.

This product contains one or more substances that are listed with the State of California as a hazardous waste.

14. TRANSPORT INFORMATION

The basic description below is specific to the container size. This information is provided for at a glance DOT information. Please refer to the container and/or shipping papers for the appropriate shipping description before tendering this material for shipment. For additional information, please contact the distributor listed in section 1 of this SDS.

DOT

UN/ID No.	UN1780
Proper shipping name	Corrosive liquids, n.o.s.
Hazard Class	8
Packing Group	II
Special Provisions	B2, IB2, T11, TP2, TP27
Description	UN1780, Corrosive liquids, n.o.s. (contains Hydrochloric Acid), 8, II
Emergency Response Guide Number	154

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

TDG

UN/ID No.	UN1780
Proper shipping name	Corrosive liquids, n.o.s.
Hazard Class	8
Packing Group	II
Description	UN1780, Corrosive liquids, n.o.s. (Contains Hydrochloric Acid), 8, II

15. REGULATORY INFORMATIONInternational Inventories

TSCA	Complies
DSL/NDL	Complies

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory

DSL/NDL - Canadian Domestic Substances List/Non-Domestic Substances List

US Federal RegulationsSARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Values %
Hydrochloric Acid - 7647-01-0	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	Yes
Fire hazard	No
Sudden release of pressure hazard	No
Reactive Hazard	No

CWA (Clean Water Act)

This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

Chemical Name	CWA - Reportable Quantities	CWA - Toxic Pollutants	CWA - Priority Pollutants	CWA - Hazardous Substances
Hydrochloric Acid 7647-01-0	5000 lb	-	-	X

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302)

Chemical Name	Hazardous Substances RQs	CERCLA/SARA RQ	Reportable Quantity (RQ)
Hydrochloric Acid 7647-01-0	5000 lb	5000 lb	RQ 5000 lb final RQ RQ 2270 kg final RQ

US State RegulationsCalifornia Proposition 65

This product has been evaluated and does not require warning labeling under California Proposition 65.

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania
Hydrochloric Acid 7647-01-0	X	X	X
Ethanol 64-17-5	X	X	X

U.S. EPA Label Information

EPA Pesticide Registration Number 10324-158-89809

EPA Statement

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets, and for workplace labels of non-pesticide chemicals. See the product label for the FIFRA hazard information as required on the pesticide label.

16. OTHER INFORMATION				
<u>NFPA</u>	Health hazards 3	Flammability 0	Instability 0	Physical and Chemical Properties -
<u>HMIS</u>	Health hazards 3	Flammability 0	Physical hazards 0	Personal protection C
Issue Date	02-Mar-2018			
Revision Date	02-Mar-2018			
Revision Note	No information available			
<u>Disclaimer</u>				
The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.				
End of Safety Data Sheet				

<u>NFPA</u>	Health hazards 3	Flammability 0	Instability 0	Physical and Chemical Properties -
<u>HMIS</u>	Health hazards 3	Flammability 0	Physical hazards 0	Personal protection C

Issue Date 02-Mar-2018

Revision Date 02-Mar-2018

Revision Note
No information availableDisclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama

Safety Data Sheet

for Health and Beauty Products

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKINGProduct Identifier

Product Name: Uline Hand Sanitizer

Other means of identification

Synonyms: None

Recommended use of the chemical and restrictions on use

Recommended Use: Hand Sanitizer

Uses advised against: No information available

Details of the supplier of the safety data sheet

Distributor Address

Uline Shipping Supplies
12575 Uline Drive
Pleasant Prairie, WI
53158
US
Phone: 1-800-295-5510Emergency telephone number

Chemtrec: 1-800-424-9300(24-Hour)


2. HAZARDS IDENTIFICATION FOR INDUSTRIAL SETTING**Hazard Classification**

This product contains a chemical or chemicals considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.122).

Flammable liquids

Category 3

GHS Label elements, including precautionary statements

Emergenc Overview		
Signal word	Hazard Statements	Danger
	Flammable liquid and vapor	
		
Appearance Clear to slightly hazy, Colorless, Viscous liquid	Physical State Viscous liquid	Odor Alcohol, Sweet, Light floral

Precautionary Statements - Prevention

Keep away from heat/sparks/open flames/hot surfaces. - No smoking
Keep container tightly closed
Ground/bond container and receiving equipment
Use explosion-proof electrical/ventilating/lighting/equipment
Use only non-sparking tools
Take precautionary measures against static discharge
Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response

Specific treatment (see supplemental first aid instructions on this label)

Eyes

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
If eye irritation persists: Get medical advice/attention

Fire

In case of fire: Use CO2, dry chemical, or foam for extinction

Inhalation

IF INHALED: If breathing is difficult, remove victim to fresh air and keep at rest in a position comfortable for breathing.
If experiencing respiratory symptoms: Call a POISON CENTER or doctor/physician

Precautionary Statements - Storage

Store in a well-ventilated place. Keep cool

Precautionary Statements - Disposal

Dispose of contents/container to an approved waste disposal plant

Hazards not otherwise classified (HNOC)

Not Applicable

Unknown Toxicity

1.271% of the mixture consists of ingredient(s) of unknown toxicity

Other information

Prolonged or repeated contact may dry skin and cause irritation

Interactions with Other Chemicals

No information available

3. COMPOSITION/INFORMATION ON INGREDIENTS

Ingredient Name	INCI-Name	Weight %	Trade Secret
Ethyl Alcohol 70% v/v	64-17-5	50-100	-
Water	7732-18-5	10-50	-
Glycerides Caprylate/Caprate	91744-32-0	0-10	-
Glycerin	56-81-5	0-10	-
Isopropyl Myristate	110-27-0	0-10	-
Tocopherol Acetate	10191-41-0	0-10	-
Acrylates/C10-30 Alkyl Acrylate Crosspolymer	N/A	0-10	-
Fragrance	Fragrance	0-10	-
Benzophenone-4	4065-45-6	0-10	-

* The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES**First aid measures****General Advice**

Show this safety data sheet to the doctor in attendance.

Eye Contact

Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Keep eye wide open while rinsing. Remove contact lenses, if applicable, and continue flushing. Do not rub affected area. If symptoms persist, call a physician.

Skin Contact

In the case of skin irritation or allergic reactions see a physician.

Inhalation

Move to fresh air. Get medical attention immediately if symptoms occur. May cause allergic respiratory reaction. If breathing has stopped, contact emergency medical services immediately and give artificial respiration.

Ingestion

Do NOT induce vomiting. Clean mouth with water and afterwards drink plenty of water. Never give anything by mouth to an unconscious person. Consult a physician if necessary.

Most important symptoms and effects, both acute and delayed**Most important Symptoms/Effects**

Burning sensation. Itching. Rashes. Hives. Coughing and/ or wheezing. May cause breathing difficulties if inhaled.

Indication of any immediate medical attention and special treatment needed**Notes to Physician**

Treat symptomatically.

5. FIRE-FIGHTING MEASURES**Suitable Extinguishing Media**

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment. Dry chemical. Carbon dioxide (CO₂). Water spray. Alcohol resistant foam.

Unsuitable Extinguishing Media

CAUTION: Use of water spray when fighting fire may be inefficient.

Specific Hazards Arising from the Chemical

Risk of Ignition. Keep product and empty container away from heat and sources of ignition. In the event of fire, cool tanks with water spray. Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations.

Uniform Fire Code

Flammable Liquid: 1-C

Hazardous Combustion Products

Carbon oxides.

Explosion Data

Sensitivity to Mechanical Impact No

Sensitivity to Static Discharge Yes

Protective Equipment and Precautions for Firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES FOR INDUSTRIAL SETTING

Alabama Public Records Law (S. 36-1-240, et seq., Code of Alabama

Personal Precautions

Avoid contact with eyes and clothing. Ensure adequate ventilation. Keep people away from and upwind of spill/leak. See section 8 for more information. ELIMINATE all ignition sources (no smoking, flares, sparks or flames in immediate area). Pay attention to flashback. Take precautionary measures against static discharges. All equipment used when handling the product must be grounded. Do not touch or walk through spilled material.

Other Information

Refer to protective measures listed in Sections 7 and 8. Ventilate the area.

Environmental precautions**Environmental Precautions**

Refer to protective measures listed in Sections 7 and 8. Prevent further leakage or spillage if safe to do so. Prevent product from entering drains.

Methods and material for containment and cleaning up**Methods for Containment**

Prevent further leakage or spillage if safe to do so. Do not touch or walk through spilled material. A vapor suppressing foam may be used to reduce vapors. Dike far ahead of spill to collect runoff water. Keep out of drains, sewers, ditches and waterways.

Methods for Cleaning Up

Take precautionary measures against static discharges. Dam up. Soak up with inert absorbent material. Pick up and transfer to properly labeled containers.

7. HANDLING AND STORAGE FOR INDUSTRIAL SETTING**Precautions for safe handling****Handling**

Handle in accordance with good industrial hygiene and safety practice. Avoid contact eyes and clothing. Do not eat, drink or smoke when using this product. Remove and wash contaminated clothing before re-use. Ensure adequate ventilation. In case of insufficient ventilation, wear suitable respiratory equipment.

Conditions for safe storage, including any incompatibilities**Storage**

Keep containers tightly closed in a dry, cool and well-ventilated place. Store locked up. Keep away from heat, sparks, flame and other sources of ignition (i.e., pilot lights, electric motors and static electricity). Keep in properly labeled containers. Do not store near combustible materials. Keep in an area equipped with sprinklers. Store in accordance with the particular national regulations. Store in accordance with local regulations.

Incompatible Products

None known based on information supplied.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION FOR INDUSTRIAL SETTING**Control parameters****Exposure Guidelines**

There is no exposure data pertaining to the Product. This section reflects exposure data pertaining to individual ingredients.

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Ethyl Alcohol 64-17-5	STEL: 1000 ppm	TWA: 1000ppm TWA: 1900 mg/m ³ (vacated) TWA: 1000ppm (vacated) TWA: 1900mg/m ³	IDLH: 3300ppm 10% LEL TWA: 1000ppm TWA: 1900 mg/m ³
Glycerin 56-81-5	TWA: 10 mg/m ³ mist	TWA: 15 mg/m ³ mist, total particulate TWA: 5 mg/m ³ mist, respirable fraction (vacated) TWA: 10 mg/m ³ mist, total particulate (vacated) TWA: 5 mg/m ³ mist, respirable fraction	

ACGIH TLV: American Conference of Governmental Industrial Hygienists - Threshold Limit Value OSHA PEL: Occupational Safety and Health Administration - Permissible Exposure Limits NIOSH IDLH Immediately Dangerous to Life or Health

Other Exposure Guidelines

Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992) See section 15 for national exposure control parameters

Appropriate engineering controls

Engineering Measures	Shoewear Eyewash stations Ventilation systems
----------------------	---

Individual protection measures, such as personal protective equipment

Eye/Face Protection	Tight seal ing safety goggles.
Skin and Body Protection	Wear protective gloves/clothing. Long sleeved clothing. Impervious gloves.
Respiratory Protection	No protective equipment is needed under normal use conditions. If irritation is experienced, ventilation and evacuation may be required.
Hygiene Measures	Handle in accordance with good industrial hygiene and safety practice. Remove and wash contaminated clothing before re-use. Avoid contact with eyes and clothing. Wear suitable gloves and eye/face protection. Do not eat, drink or smoke when using this product.

9. PHYSICAL AND CHEMICAL PROPERTIESPhysical and Chemical Properties

Physical State	Viscous liquid		
Appearance	Clear to slightly hazy, Colorless, Viscous liquid	Odor	Alcohol, Sweet, Light floral
Color	No information available	Odor Threshold	No information available
<u>Property</u>		<u>Remarks/ Method</u>	
pH	7.1	None known	
Melting/freezing point	No data available	None known	
Boiling Point/Range	No data available	None known	
Flash Point	23 C / 73 F	None known	
Evaporation rate	No data available	None known	
Flammability (solid, gas)	No data available	None known	
Flammability Limits in Air			
Upper flammability limit	No data available		
Lower flammability limit	No data available		
Vapor pressure	No data available	None known	
Vapor density	No data available	None known	
Specific Gravity	0.88	None known	
Water Solubility	Miscible with water	None known	
Solubility in other solvents	No data available	None known	
Partition coefficient: n-octanol/water	No data available	None known	
Autoignition temperature	No data available	None known	
Decomposition temperature	No data available	None known	
Kinematic viscosity	No data available	None known	
Dynamic viscosity	No data available	None known	
Explosive Properties	No data available		
Oxidizing Properties	No data available		
<u>Other Information</u>			
Softening Point	No data available		
VOE Content (%)	No data available		
Particle Size	No data available		
Particle Size Distribution	No data available		

10. STABILITY AND REACTIVITY FOR INDUSTRIAL SETTING**Reactivity**

No data available.

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Hazardous Polymerization

Hazardous polymerization does not occur.

Conditions to avoid

Heat, flames and sparks.

Incompatible materials

None known based on information supplied.

Hazardous Decomposition Products

Carbon oxides.

When used in accordance with the directions.

11. TOXICOLOGICAL INFORMATION FOR INDUSTRIAL SETTING

There is no data for this product. The information included in this section describes the potential hazards of the individual ingredients.

Information on likely routes of exposure**Product Information**

Inhalation	May cause irritation of respiratory tract.
Eye Contact	Irritating to eyes. May cause redness, itching, and pain.
Skin Contact	Prolonged contact may cause redness and irritation.
Ingestion	Ingestion may cause irritation to mucous membranes. Ingestion may cause gastrointestinal irritation, nausea, vomiting and diarrhea.

Component Information

No information available.

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
Ethyl Alcohol 64-17-5	-	-	- 124.7 mg /L (Rat) 4 h
Glycerin 56-81-5	-	> 10 g/kg (Rabbit)	-

Information on toxicological effects**Symptoms**

Redness of the skin. May cause redness and tearing of the eyes. Itching. Rashes. Hives. Coughing and/ or wheezing. Symptoms of allergic reaction may include rash, itching, swelling, trouble breathing, tingling of the hands and feet, dizziness, lightheadedness, chest pain, muscle pain, or flushing.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization	No information available.
Mutagenic Effects	No information available.
Carcinogenicity	N/A
Reproductive Toxicity	No information available.
STOT - single exposure	No information available.
STOT - repeated exposure	No information available.
Chronic Toxicity	No information available.
Target Organ Effects	Eyes. Skin.
Aspiration Hazard	No information available.

Numerical measures of toxicity Product Information

The following values are calculated based on chapter 3.1 of the GHS document

ATEmix (inhalation-dust/mist)

196.90 mg/l

12. ECOLOGICAL INFORMATION FOR INDUSTRIAL SETTING

There is no ecological data on the Product. The Product ingredients are expected to be safe for the environmental concentrations predicted under normal use and accidental spill scenarios. Packaging components are compatible with the conventional solid waste management practices.

<u>Ecotoxicity</u>	No information available.
<u>Persistence and Degradability</u>	No information available.
<u>Bioaccumulation</u>	No information available.
<u>Other Adverse Effects</u>	No information available.

13. DISPOSAL CONSIDERATIONS FOR INDUSTRIAL SETTING**Waste treatment methods****Waste Disposal Methods**

This material, as supplied, is not a hazardous waste according to Federal regulations (40 CFR 261). This material could become a hazardous waste if it is mixed with or otherwise comes in contact with a hazardous waste, if chemical additions are made to this material, or if the material is processed or otherwise altered. Consult 40 CFR 261 to determine whether the altered material is a hazardous waste. Consult the appropriate state, regional, or local regulations for additional requirements.

Contaminated Packaging

Dispose of in accordance with local regulations.

California Hazardous Waste Codes 331

This product contains one or more substances that are listed with the State of California as a hazardous waste.

Chemical Name	California Hazardous Waste
Ethyl Alcohol 64-17-5	Toxic I ntable

14. TRANSPORT INFORMATION

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama

Proper Shipping Name	CONSUMER COMMODITY
Hazard Class	ORM-D
Description	CONSUMER COMMODITY, ORM-D
Emergency Response Guide Number	127
TDG	
UN-No.	UN1170
Proper Shipping Name	ETHANOL
Hazard Class	3
Packing Group	III
Description	UN1170, ETHANOL, 3, III
MEX	
UN-No.	UN1170
Proper Shipping Name	ETHANOL
Hazard Class	3
Packing Group	III
Description	UN1170, ETHANOL, 3, III
ICAO	
UN-No.	UN1170
Proper Shipping Name	ETHANOL
Hazard Class	3
Packing Group	III
Description	UN1170, ETHANOL, 3, III
IATA	
UN-No.	UN1170
Proper Shipping Name	ETHANOL
Hazard Class	3
Packing Group	III
Description	UN1170, ETHANOL, 3, III
IMDG/IMO	
UN-No.	UN1170
Proper Shipping Name	ETHANOL
Hazard Class	3
Packing Group	III
Erms No.	F-E, S-D
Description	UN1170, ETHANOL, 3, 111, (23 °C C C)
RID	
UN-No.	UN1170
Proper Shipping Name	ETHANOL SOLUTION
Hazard Class	3
Packing Group	III
Classification code	F1
Description	UN1170, ETHANOL SOLUTION, 3, III
ADR	
UN-No.	UN1170
Proper Shipping Name	ETHANOLSOLUTION
Hazard Class	3
Packing Group	III
Classification code	F1
Tunnel restriction code	(D/E)
Description	UN1170, ETHANOLSOLUTION, 3, III
ADN	
UN-No.	UN1170
Proper Shipping Name	ETHANOL SOLUTION
Hazard Class	3
Packing Group	III
Classification code	F1
Special Provisions	144, 601
Description	UN1170, ETHANOLSOLUTION, 3, III
Limited Quantity	S L
Ventilation	VE01

15. REGULATORY INFORMATION FOR INDUSTRIAL SETTING**International Inventories**

TSCA Exempt
 DSL All components are listed either on the DSL or NDSL.

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
 DSUNDSL - Canadian Domestic Substances List/Non-Domestic Substances List

U.S. Federal Regulations**SARA 313**

Section 313 of Title 111 of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product does not contain any chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372.

SARA 311/312 Hazard Categories

Acute Health Hazard	No
Chronic Health Hazard	No
Fire Hazard	Yes
Sudden Release of Pressure Hazard	No
Reactive Hazard	No

Clean Water Act (CWA)

This product does not contain any substances regulated as pollutants pursuant to the CWA (40 CFR 122.21 and 40 CFR 122.42).

CERCLA

This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material.

U.S. State Regulations**California Proposition 65 - NONE**

This product does not contain any Proposition 65 chemicals.

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Rhode Island	Illinois
Ethyl Alcohol 64-17-5		X			
Glycerin 56-81-5	X	X	X	X	

International Regulations**Mexico****National occupational exposure limits**

Component	Carcinogen Status	Exposure Limits
Ethyl Alcohol 64-17-5 (30 - 60)		Mexico: TWA 1000 ppm Mexico: TWA 1900 mg/m ³
Glycerin 56-81-5 (1 - 5)	-	10mg/m (mst) TWA

Canada

WHMIS Hazard Class

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SAFETY DATA SHEET

Issuing Date January 5, 2015

Revision Date June 8, 2017

Revision Number 1

1. IDENTIFICATION OF THE SUBSTANCE/PREPARATION AND OF THE COMPANY/UNDERTAKING

Product identifier

Product Name Clorox Commercial Solutions® Formula 409® Cleaner Degreaser Disinfectant

Other means of identification

EPA Registration Number 67619-10

Recommended use of the chemical and restrictions on use

Recommended Use General purpose cleaner, degreaser, and disinfectant

Uses advised against No information available

Details of the supplier of the safety data sheet

Supplier Address

Clorox Professional Products Company
1221 Broadway
Oakland, CA 94612

Phone: 1-510-271-7000

Emergency telephone number

Emergency Phone Numbers

For Medical Emergencies call: 1-800-446-1014
For Transportation Emergencies, call Chemtrec: 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

This mixture is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200).

Skin corrosion/irritation

Category 3

GHS Label elements, including precautionary statements

Emergency Overview

Signal word	Warning
Hazard statements Causes mild skin irritation	No pictogram required.
Appearance Clear	Physical State Thin liquid
	Odor Floral, citrus

Precautionary Statements - Prevention

None

Precautionary Statements - Response

If skin irritation occurs: Get medical advice.

Precautionary Statements - Storage

None

Precautionary Statements - Disposal

None

Hazards not otherwise classified (HNOC)

Not applicable

Unknown Toxicity

0.2% of the mixture consists of ingredient(s) of unknown toxicity

Other information

Very toxic to aquatic life with long-lasting effects.

Interactions with Other Chemicals

None known.

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS-No	Weight %	Trade Secret
Lauramine oxide	1643-20-5	0.5 - 1.5	*
n-Alkyl (40% C12, 50% C14, 10% C16) dimethyl benzyl ammonium chloride	68424-85-1	0.2 - 0.4	*

* The exact percentage (concentration) of composition has been withheld as a trade secret

4. FIRST AID MEASURESFirst aid measures

General Advice	Show this safety data sheet to the doctor in attendance.
Eye Contact	Hold eye open and rinse slowly and gently with water for 15 - 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Skin Contact	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Inhalation	Move to fresh air. If breathing is affected, call a doctor.
Ingestion	Call a poison control center or doctor immediately for treatment advice. Have person sip a glassful of water if able to swallow. DO NOT induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Most important symptoms and effects, both acute and delayed

Most Important Symptoms/Effects Mild irritation of eyes and skin.

Indication of any immediate medical attention and special treatment needed

Notes to Physician Treat symptomatically.

5. FIRE-FIGHTING MEASURESSuitable Extinguishing Media

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable Extinguishing Media

CAUTION: Use of water spray when fighting fire may be inefficient.

Specific Hazards Arising from the Chemical

No information available

Explosion Data

Sensitivity to Mechanical Impact None

Sensitivity to Static Discharge None

Protective Equipment and Precautions for Firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURESPersonal precautions, protective equipment and emergency procedures

- Personal Precautions** Avoid contact with eyes and skin.
- Other Information** Refer to protective measures listed in Sections 7 and 8.

Environmental precautions

- Environmental Precautions** See Section 12 for additional ecological information

Methods and material for containment and cleaning up

- Methods for Containment** Prevent further leakage or spillage if safe to do so.
- Methods for Cleaning Up** Absorb and containerize. Wash residual down to sanitary sewer. Contact the sanitary treatment facility in advance to assure ability to process washed-down material.

7. HANDLING AND STORAGEPrecautions for safe handling

- Handling** Handle in accordance with good industrial hygiene and safety practice. Avoid contact with eyes, skin, and clothing. Do not eat, drink, or smoke when using this product.

Conditions for safe storage, including any incompatibilities

- Storage** Keep containers tightly closed in a dry, cool, and well-ventilated place.
- Incompatible Products** None known.

8. EXPOSURE CONTROLS/PERSONAL PROTECTIONControl parametersExposure Guidelines

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
Lauramine oxide 1643-20-5	None	None	None
n-Alkyl (40% C12, 50% C14, 10% C16) dimethyl benzyl ammonium chloride 68424-85-1	None	None	None

ACGIH TLV: American Conference of Governmental Industrial Hygienists - Threshold Limit Value. OSHA PEL: Occupational Safety and Health Administration - Permissible Exposure Limits. NIOSH IDLH: Immediately Dangerous to Life or Health.

Appropriate engineering controls

- Engineering Measures** Showers
Eyewash stations
Ventilation systems

Individual protection measures, such as personal protective equipment

Eye/Face Protection	If splashes are likely to occur, wear safety glasses with side-shields. None required for consumer use.
Skin and Body Protection	No special protective equipment required.
Respiratory Protection	If irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.
Hygiene Measures	Remove and wash contaminated clothing before re-use. Avoid contact with skin, eyes, or clothing. Do not eat, drink, or smoke when using this product.

9. PHYSICAL AND CHEMICAL PROPERTIESPhysical and Chemical Properties

Physical State	Thin liquid		
Appearance	Clear	Odor	Floral, citrus
Color	Clear	Odor Threshold	No information available
Property	Values	Remarks/ Method	
pH	9 - 11.5	None known	
Melting/freezing point	No data available	None known	
Boiling Point/Range	No data available	None known	
Flash Point	No data available	None known	
Evaporation rate	No data available	None known	
Flammability (solid, gas)	No data available	None known	
Flammability Limits in Air			
Upper flammability limit	No data available	None known	
Lower flammability limit	No data available	None known	
Vapor pressure	No data available	None known	
Vapor density	No data available	None known	
Specific Gravity	~1.0	None known	
Water Solubility	Soluble in water.	None known	
Solubility in other solvents	No data available	None known	
Partition coefficient: n-octanol/water	No data available	None known	
Autoignition temperature	No data available	None known	
Decomposition temperature	No data available	None known	
Kinematic viscosity	No data available	None known	
Dynamic viscosity	No data available	None known	
Explosive Properties	Not explosive		
Oxidizing Properties	No data available		
Other Information			
Softening Point	No data available		
VOC Content (%)	No data available		
Particle Size	No data available		
Particle Size Distribution	No data available		

10. STABILITY AND REACTIVITY

Reactivity

No data available.

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Conditions to avoid

None known.

Incompatible materials

None known.

Hazardous Decomposition Products

None known based on information supplied.

11. TOXICOLOGICAL INFORMATION

Information on likely routes of exposure**Product Information**

Inhalation	Exposure to vapor or mist may irritate respiratory tract.
Eye Contact	May cause eye irritation.
Skin Contact	Prolonged contact may cause irritation.
Ingestion	Ingestion may cause irritation to mucous membranes and gastrointestinal irritation, nausea, vomiting, and diarrhea.

Information on toxicological effects

Symptoms May cause redness and tearing of the eyes and skin redness.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization	No information available.
Mutagenic Effects	No information available.
Carcinogenicity	Contains no ingredient listed as a carcinogen.
Reproductive Toxicity	No information available.
STOT - single exposure	No information available.
STOT - repeated exposure	No information available.
Chronic Toxicity	No known effect.
Target Organ Effects	Respiratory system, eyes, skin, gastrointestinal tract (GI).
Aspiration Hazard	No information available.

Numerical measures of toxicity Product Information

The following values are calculated based on chapter 3.1 of the GHS document Not applicable.

12. ECOLOGICAL INFORMATION**Ecotoxicity**

Very toxic to aquatic life with long lasting effects.

Persistence and Degradability

No information available.

Bioaccumulation

No information available.

Other Adverse Effects

No information available.

13. DISPOSAL CONSIDERATIONS**Disposal methods**

Dispose of in accordance with all applicable federal, state, and local regulations.

Contaminated Packaging

Do not reuse empty containers. Dispose of in accordance with all applicable federal, state, and local regulations.

14. TRANSPORT INFORMATION

<u>DOT</u>	Not regulated
<u>TDG</u>	Not regulated
<u>ICAO</u>	Not regulated
<u>IATA</u>	Not regulated
<u>IMDG/IMO</u>	Not regulated

15. REGULATORY INFORMATION**Chemical Inventories**

TSCA	All components of this product are either on the TSCA 8(b) Inventory or otherwise exempt from listing.
DSL/NDSL	All components are on the DSL or NDSL.

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
 DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

U.S. Federal Regulations**SARA 313**

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product does not contain any chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372.

SARA 311/312 Hazard Categories

Acute Health Hazard	Yes
Chronic Health Hazard	No
Fire Hazard	No
Sudden Release of Pressure Hazard	No
Reactive Hazard	No

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975)

Clean Water Act

This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42).

CERCLA

This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material.

EPA Statement

This chemical is a pesticide product registered by the Environmental Protection Agency and is subject to certain labeling requirements under federal pesticide law. These requirements differ from the classification criteria and hazard information required for safety data sheets and for workplace labels of non-pesticide chemicals. Following is the hazard information as required on the pesticide label:

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Avoid contact with foods.

U.S. State Regulations**California Proposition 65**

This product does not contain any Proposition 65 chemicals.

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania	Rhode Island	Illinois
Ethanolamine 141-43-5	X	X	X	-	X

International Regulations**Canada**

WHMIS Hazard Class

D2B Toxic Materials



Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

16. OTHER INFORMATION

NFPA	Health Hazard	1	Flammability	0	Instability	0	Physical and Chemical Hazards	-
HMIS	Health Hazard	1	Flammability	0	Physical Hazard	0	Personal Protection	B

Prepared By	Product Stewardship 23 British American Blvd. Latham, NY 12110 1-800-572-6501
Preparation/Revision Date	January 5, 2015
Revision Date	June 8, 2017
Revision Note	Updated to remove green dye.
Reference	1050911/166962.001

General Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information, and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text

End of Safety Data Sheet



Issue Date 07-Mar-2018

Revision Date 06-Mar-2018

Version 1

1. PRODUCT AND COMPANY IDENTIFICATION

Product identifier

Product Name Lavender

Other means of identification

Product Code S-19454

Synonyms None

Details of the supplier of the safety data sheet

Company Name ULINE
 12575 Uline Drive
 Pleasant Prairie, WI 53158
 (800) 295-6510
<http://www.uline.com/>

Emergency telephone number

Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status

This product has been classified in accordance with the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Acute toxicity - Oral	Not classified
Acute toxicity - Dermal	Not classified

Label elements

Emergency Overview

Appearance Clear Purple

Physical state Liquid

Odor Lavender

Precautionary Statements - Prevention

Wash hands thoroughly after handling

Precautionary Statements - Response

Specific Treatment (See Section 4 on the SDS)

IF ON SKIN: Wash with plenty of soap and water

IF skin irritation or rash occurs: Get medical advice/attention

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing

Call a POISON CENTER or doctor/physician if you feel unwell

IF SWALLOWED: Rinse mouth. DO NOT induce vomiting

Drink plenty of water

Immediately call a POISON CENTER or doctor/physician

Precautionary Statements - Disposal

Disposal should be in accordance with applicable regional, national and local laws and regulations

Hazards not otherwise classified (HNOC)**Other Information**

- Harmful to aquatic life with long lasting effects
- Harmful to aquatic life

Unknown Acute Toxicity

0% of the mixture consists of ingredient(s) of unknown toxicity

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	Weight-%	Trade Secret
Surfactant Blend	Proprietary	1-5	*

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES**First aid measures**

Skin Contact	Wash off immediately with plenty of water for at least 15 minutes. If skin irritation persists, call a physician.
Eye contact	Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. If symptoms persist, call a physician.
Inhalation	Remove to fresh air. If symptoms persist, call a physician.
Ingestion	Do NOT induce vomiting. Drink plenty of water. Immediate medical attention is not required. Rinse mouth.
Self-protection of the first aider	Use personal protective equipment as required.

Most important symptoms and effects, both acute and delayed

Symptoms	Any additional important symptoms and effects are described in Section 11: Toxicology Information.
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Indication of any immediate medical attention and special treatment needed

Note to physicians	May cause sensitization of susceptible persons.
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5. FIRE-FIGHTING MEASURES**Suitable extinguishing media**

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media Caution: Use of water spray when fighting fire may be inefficient.**Specific hazards arising from the chemical**

In the event of fire and/or explosion do not breathe fumes. May cause sensitization by inhalation and skin contact. Thermal decomposition can lead to release of irritating and toxic gases and vapors.

Explosion data

Sensitivity to Mechanical Impact None.
Sensitivity to Static Discharge None.

Protective equipment and precautions for firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURES

Personal precautions, protective equipment and emergency procedures

Personal precautions Use personal protective equipment as required. Avoid contact with eyes and skin.

Environmental precautions

Environmental precautions Do not allow into any storm sewer drains, lakes, streams, ponds, estuaries, oceans or other surface water bodies. Should not be released into the environment. Dispose of according to all local, state and federal rules and regulations.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Soak up with inert absorbent material. Pick up and transfer to properly labeled containers. After cleaning, flush away traces with water. Prevent product from entering drains.

7. HANDLING AND STORAGE

Precautions for safe handling

Advice on safe handling Ensure adequate ventilation, especially in confined areas. Use personal protective equipment as required.

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep out of the reach of children. Keep container tightly closed. Keep containers tightly closed in a cool, well-ventilated place.

Incompatible materials None known based on information supplied.

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

Control parameters

Appropriate engineering controls

Engineering Controls Showers, Eyewash stations & Ventilation systems.

Individual protection measures, such as personal protective equipment

Eye/face protection Safety glasses or chemical splash goggles.

Skin and body protection Rubber gloves.

Respiratory protection Ensure adequate ventilation, especially in confined areas. In case of inadequate ventilation wear respiratory protection.

General Hygiene When using do not eat, drink or smoke. Wash contaminated clothing before reuse.

9. PHYSICAL AND CHEMICAL PROPERTIES

Information on basic physical and chemical properties

Physical state	Liquid
Appearance	Clear Purple
Color	Purple
Odor	Lavender
Odor threshold	No information available

<u>Property</u>	<u>Values</u>	<u>Remarks • Method</u>
pH	6.0 - 8.0	
Specific Gravity	1.0	
Viscosity	< 25 cP @ 25°C	
Melting point/freezing point	No information available	
Flash point	None	
Boiling point / boiling range	100 °C / 212 °F Degrees	
Evaporation rate	No information available	
Flammability (solid, gas)	No data available	
Flammability Limits in Air		
Upper flammability limit:	No information available	
Lower flammability limit:	No information available	
Vapor pressure	No information available	
Vapor density	No information available	
Water solubility	Complete	
Partition coefficient	No information available	
Autoignition temperature	No information available	
Decomposition temperature	No information available	

Other Information

Density Lbs/Gal	8.33
VOC Content (%)	0%

10. STABILITY AND REACTIVITYReactivity

No data available

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Conditions to avoid

Extremes of temperature and direct sunlight.

Incompatible materials

None known based on information supplied.

Hazardous Decomposition Products

None known based on information supplied.

11. TOXICOLOGICAL INFORMATIONInformation on likely routes of exposure

Product Information

Inhalation	Avoid breathing vapors or mists. May cause irritation of respiratory tract.
Eye contact	Avoid contact with eyes. May cause irritation.
Skin Contact	Avoid contact with skin. Prolonged or repeated contact may dry skin and cause irritation.
Ingestion	Do not taste or swallow. May cause gastro intestinal irritation.

<u>Chemical Name</u>	<u>Oral LD50</u>	<u>Dermal LD50</u>	<u>Inhalation LC50</u>
Surfactant Blend	> 2000 mg/kg (Rat)	> 2000 mg/kg (Rat)	-

Information on toxicological effects

Symptoms No Information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Sensitization No Information available.
Germ cell mutagenicity No Information available.
Carcinogenicity No Information available.
Reproductive toxicity No Information available.
STOT - single exposure No Information available.
STOT - repeated exposure No Information available.
Chronic toxicity Repeated contact may cause allergic reactions in very susceptible persons. Avoid repeated exposure.
Aspiration hazard No Information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 0% of the mixture consists of ingredient(s) of unknown toxicity

The following values are calculated based on chapter 3.1 of the GHS document .

ATEmix (oral) 66,667.00
ATEmix (dermal) 66,667.00

12. ECOLOGICAL INFORMATION

Ecotoxicity

0% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
Surfactant Blend	-	1.2: 96 h Oncorhynchus mykiss mg/L LC50	5.3: 48 h Daphnia mg/L LC50

Persistence and degradability

No Information available.

Bioaccumulation

No Information available.

Other adverse effects

No Information available

13. DISPOSAL CONSIDERATIONS

Waste treatment methods

Disposal of wastes Disposal should be in accordance with applicable regional, national and local laws and regulations.

Contaminated packaging Do not reuse container.

This product contains one or more substances that are listed with the State of California as a hazardous waste.

14. TRANSPORT INFORMATION

The basic description below is specific to the container size. This information is provided for at a glance DOT information. Please refer to the container and/or shipping papers for the appropriate shipping description before tendering this material for shipment. For additional information, please contact the distributor listed in section 1 of this SDS.

DOT Not regulated

TDG Not regulated

15. REGULATORY INFORMATION

International Inventories

TSCA	Complies
DSL/NDSL	Complies

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory
 DSL/NDSL - Canadian Domestic Substances List/Non-Domestic Substances List

US Federal Regulations

SARA 313

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product does not contain any chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	No
Fire hazard	No
Sudden release of pressure hazard	No
Reactive Hazard	No

CWA (Clean Water Act)

This product does not contain any substances regulated as pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

CERCLA

This material, as supplied, does not contain any substances regulated as hazardous substances under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302) or the Superfund Amendments and Reauthorization Act (SARA) (40 CFR 355). There may be specific reporting requirements at the local, regional, or state level pertaining to releases of this material

US State Regulations

California Proposition 65

This product has been evaluated and does not require warning labeling under California Proposition 65.

U.S. State Right-to-Know Regulations

U.S. EPA Label Information

EPA Pesticide Registration Number Not Applicable

16. OTHER INFORMATION

<u>NEPA</u>	Health hazards 2	Flammability 0	Instability 0	Physical and Chemical Properties -
<u>HMIS</u>	Health hazards 2	Flammability 0	Physical hazards 0	Personal protection B

Issue Date 07-Mar-2018

Revision Date 06-Mar-2018

Revision Note

No Information available

Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage,

~~o Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975)~~

transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet

SAFETY DATA SHEET

ULINE ALL PURPOSE FOAMING SOAP

SECTION 1 – PRODUCT AND COMPANY IDENTIFICATION

Product Name : ULINE ALL PURPOSE FOAMING SOAP

Product Code : S18230, S19492, S18233

Recommended use : General purpose hand cleaner

Product dilution information : Product is sold ready to use.

Company : ULINE
12575 Uline Drive
Pleasant Prairie, WI 53158

Chemtrec Phone : 1-800-424-9300

Emergency Phone : 1-800-958-5463

Issuing date : 3/2/2020

SECTION 2 – HAZARD(S) IDENTIFICATION

GHS Classification : Category 2B
Eye irritation

GHS Label Element
Hazards pictograms



Signal Word : Warning

Hazard Statements : **Response:**
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do so. Continue rinsing. If eye irritation persists: Get medical advice/attention.

Other Hazards : None known.

SECTION 3 – COMPOSITION / INFORMATION ON INGREDIENTS

Pure substance/mixture : Mixture

<u>Chemical Name</u>	<u>Concentration (%)</u>	<u>CAS No.</u>
AMMONIUM LAURYL SULFATE	0 - 5	68585-34-2
AMMONIUM LAURETH SULFATE	0 - 5	67762-19-0
PEG-80 GLYCERYL COCOATE	0 - 5	68201-48-7
DISODIUM COCOAMPHODIACETATE	0 - 5	68650-39-5
PROPYLENE GLYCOL	0 - 5	57-55-8

SAFETY DATA SHEET

Alabama Public Records Law (8/30/12-40, et seq), Code of Alabama

SECTION 4 – FIRST AID MEASURES

- In case of eye contact : Flush eyes under eyelids with plenty of cool water for at least 15 minutes. If irritation persists, seek medical/advise attention.
- In case of skin contact : If irritation persists, wash with water.
- If ingested : Contact a physician or Poison Control Center immediately. Do not induce vomiting never give anything by mouth to an unconscious person.
- If inhaled : Get medical attention if symptoms occur.
- Protection of first-aiders : No special precautions are necessary.
- Notes to physicians : Treat symptomatically.

SECTION 5 – FIRE-FIGHTING MEASURES

- Suitable extinguishing media : Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.
- Unsuitable extinguishing media : None known.
- Specific hazards during firefighting : No flammable or combustible.
- Hazardous combustions products : Carbon oxides
- Special protective equipment for fire-fighters : Use personal protective equipment.
- Specific extinguishing methods : Fire residues and contaminated fire extinguishing water must be disposed of in accordance with local regulations. In the event of fire and/or explosion do not breathe fumes.

SECTION 6 – ACCIDENTAL RELEASE MEASURES

- Personal precautions : No special measures required.
- Environmental precautions : Avoid contact of large amounts of spilled material runoff with soil and surface waterways.
- Methods of cleaning up : Absorb with inert material. Use a water rinse for final clean-up.

SECTION 7 – HANDLING AND STORAGE

- Handling : Wash hands after handling.
- Storage : Keep out of reach of children. Keep container tightly closed. Store between 32 to 122 degrees F.

SECTION 8 – EXPOSURE CONTROLS / PERSONAL PROTECTION

Ingredients with workplace control parameters.

<u>Ingredients</u>	<u>CAS-No.</u>	<u>Form of exposure</u>	<u>Permissible Concentration</u>	<u>Basis</u>
PROPYLENE GLYCOL	57-55-8	TWA	10 mg/m3	WEEL

SAFETY DATA SHEET

Alabama Public Records Law (§ 36-12-40, et seq), Code of Alabama

ULINE (SL PURPOSE FOAMING CO.,P.

Engineering measures : Good general ventilation should be sufficient to control workers exposure to airborne contamination.

Personal protection

Eyes : Eye protection should be used when splashing may occur.
Hands : No protective equipment is needed under normal use.
Skin : No protective equipment is needed under normal use.
Respiratory : No protective equipment is needed under normal use.

Consult local authorities for acceptable exposure limits.

SECTION 9 – PHYSICAL AND CHEMICAL PROPERTIES

Appearance: Water thin medium green liquid	Upper/lower flammability limits: N/A
Odor: Jasmine fragrance	Vapor pressure: N/A
Odor Threshold: No data available	Vapor density: N/A
ph: 6.5 typical	Relative density: No data available.
Melting point/freezing point: N/A	Solubility (ies): No data available.
Initial boiling and boiling range: N/A	Partition coefficient: n-octanol/water: No data available.
Flash point: N/A	Auto ignition temperature: N/A
Evaporation rate: <1	Decomposition temperature: No data available.
Flammability (solid, gas): No data available	Viscosity: N/A

SECTION 10 – STABILITY AND REACTIVITY

Stability : The product is stable under normal conditions.
Possibility of hazardous reactions : No dangerous reaction is known under conditions of normal use.
Conditions to avoid : None known.
Incompatible materials : None known.
Hazardous decomposition products : Carbon oxides

SECTION 11 – TOXICOLOGICAL INFORMATION

Information on likely routines of exposure : Inhalation, eye contact, skin contact.

Potential Health Effects

Eyes : Cause of irritation.
Skin : Health injuries are not known or expected under normal use.
Ingestion : Health injuries are not known or expected under normal use.
Inhalation : Health injuries are not known or expected under normal use.
Chronic exposure : Health injuries are not known or expected under normal use.

Experience with Human Exposure

Eye contact : Redness, irritation.
Skin contact : No symptoms known or expected.
Ingestion : No symptoms known or expected.
Inhalation : No symptoms known or expected.

SAFETY DATA SHEET

Alabama Public Records Law (§ 36-12-40), et seq., Code of Alabama

Toxicity

Acute oral toxicity	: Acute toxicity estimate: >5,000 mg/kg
Acute inhalation toxicity	: No data available
Acute dermal toxicity	: Acute toxicity estimate: >5,000 mg/kg
Skin corrosion/irritation	: No data available
Serious eye damage/eye irritation	: Mild eye irritation.
Respiratory or skin sensitization	: No data available.

Carcinogenicity

IARC	: No component of this product present at levels greater than or equal to 0.1% is identified as a probable, possible or confirmed human carcinogen by IARC.
OSHA	: No ingredient of this product presents at levels greater than or equal to 0.1% is identified as a carcinogen or potential carcinogen by OSHA.
NTP	: No ingredient of this product present at levels greater than or equal to 0.1% is identified as a known or anticipated carcinogen by NTP.

SECTION 12 – ECOLOGICAL INFORMATION

Ecological Tests	: Data is not available.
Environmental Impact	: The product ingredients are expected to be safe for the environment at the concentrations predicted under normal use and accidental spill scenarios. Packaging components are compatible with the conventional solid waste management practices.

SECTION 13 – DISPOSAL CONSIDERATIONS

Disposal methods	: The product should not be allowed to enter drains, water courses or the soil. When possible recycling is preferred to disposal or incineration. If recycling is not practicable, dispose of in compliance with local regulations. Dispose of wastes in an approved waste disposal facility.
Disposal considerations	: Dispose of as unused product. Empty containers should be taken to an approved waste handling site for recycling or disposal. Do not reuse empty containers.

SAFETY DATA SHEET

LINE SOLUTIONS CORPORATION SOAP

SECTION 14 – TRANSPORT INFORMATION

Certain shipping modes or package sizes may have exceptions from the transport regulations. The classification provided may not reflect those exceptions and may not apply to all shipping modes or package sizes. The shipper / consignor / sender are responsible to ensure that the packaging, labeling, and markings are in compliance with the selected mode of transport.

Shipment	Identification Number	Proper Shipping Name	Hazardous Classification	Packaging Group
US DOT	Not dangerous goods	N/A	N/A	None
IATA (Air)	Not dangerous goods	N/A	N/A	None
IMDG (Vessel)	Not dangerous goods	N/A	N/A	None

SECTION 15 – REGULATORY INFORMATION

U.S. Federal regulations

- TSCA 8(b) Inventory : All components are listed or exempted.
- SARA 302/304/311/312 : No listed substance.
- Extremely Hazardous Substances
- SARA 302/304 Emergency Planning and Notification : No listed substance.

SAFETY DATA SHEET

ALABAMA PUBLIC RECORDS LAW (S. 36-12-40 ET SEQ. CODE OF ALABAMA)
ONLINE ALL PURPOSE FOAMING SOAP

SECTION 16 - OTHER INFORMATION

NFPA 704:



HMIS III:

HEALTH	1
FLAMMABILITY	0
PHYSICAL HAZARDS	0

Issuing date : 3/2/2020
Version : 2.0
Prepared by : Regulatory Compliance

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information relates only to the specific material designated and may not be valid for such material used in conjunction with any other materials or in any process, unless specified in the text.

SAFETY DATA SHEET

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975)



Issue Date 25-Nov-2019

Revision Date 08-Mar-2018

Version 1

1. PRODUCT AND COMPANY IDENTIFICATION

Product identifier

Product Name ULINE Industrial Purple Degreaser

Other means of identification

Product Code S-20692

Synonyms None

Details of the supplier of the safety data sheet

Company Name ULINE
12575 Uline Drive
Pleasant Prairie, WI 53158
(800) 295-5510
<http://www.uline.com/>

Emergency telephone number

Emergency Telephone Chemtrec 1-800-424-9300

2. HAZARDS IDENTIFICATION

Classification

OSHA Regulatory Status

This chemical is considered hazardous by the 2012 OSHA Hazard Communication Standard (29 CFR 1910.1200)

Acute toxicity - Oral	Not classified
Acute toxicity - Dermal	Not classified
Skin corrosion/irritation	Category 1
Serious eye damage/eye irritation	Category 1

Label elements

Emergency Overview

Danger

Hazard statements

Causes severe skin burns and eye damage



Appearance Clear Violet

Physical state Liquid

Odor Sassafras

Precautionary Statements - Prevention

Do not breathe dust/fume/gas/mist/vapors/spray
 Wash face, hands and any exposed skin thoroughly after handling
 Wear protective gloves/protective clothing/eye protection/face protection

Precautionary Statements - Response

Specific Treatment (See Section 4 on the SDS)

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing

Immediately call a POISON CENTER or doctor/physician

IF ON SKIN (or hair): Remove/Take off immediately all contaminated clothing. Rinse skin with water/shower

Wash contaminated clothing before reuse

IF INHALED: Remove victim to fresh air and keep at rest in a position comfortable for breathing

Immediately call a POISON CENTER or doctor/physician

IF SWALLOWED: Rinse mouth. DO NOT induce vomiting

Drink plenty of water

Immediately call a POISON CENTER or doctor/physician

Precautionary Statements - Storage

Store locked up

Precautionary Statements - Disposal

Disposal should be in accordance with applicable regional, national and local laws and regulations

Hazards not otherwise classified (HNOC)**Other Information**

Unknown Acute Toxicity

0.02% of the mixture consists of ingredient(s) of unknown toxicity

3. COMPOSITION/INFORMATION ON INGREDIENTS

Chemical Name	CAS No.	Weight-%	Trade Secret
2-(2-butoxyethoxy)ethanol	112-34-5	1-5	*
2-butoxyethanol	111-76-2	1-5	*
Sodium Metasilicate	8834-92-0	1-5	*
Surfactant Blend	Proprietary	1-5	*

*The exact percentage (concentration) of composition has been withheld as a trade secret.

4. FIRST AID MEASURES**First aid measures****General advice**

Immediate medical attention is required.

Skin Contact

Immediate medical attention is required. Wash off immediately with soap and plenty of water while removing all contaminated clothes and shoes.

Eye contact

Immediate medical attention is required. Rinse immediately with plenty of water, also under the eyelids, for at least 15 minutes. Keep eye wide open while rinsing. Do not rub affected area.

Inhalation

Remove to fresh air. Call a physician or poison control center immediately. If not breathing, give artificial respiration. If breathing is difficult, give oxygen.

Ingestion

Immediate medical attention is required. Do NOT induce vomiting. Drink plenty of water. Never give anything by mouth to an unconscious person. Remove from exposure, lie down. Clean mouth with water and drink afterwards plenty of water. Call a physician or poison control center immediately.

Self-protection of the first aider

Use personal protective equipment as required. Avoid contact with skin, eyes or clothing.

Most important symptoms and effects, both acute and delayed

Symptoms Any additional important symptoms and effects are described in Section 11: Toxicology Information.

Indication of any immediate medical attention and special treatment needed

Note to physicians Product is a corrosive material. Use of gastric lavage or emesis is contraindicated. Possible perforation of stomach or esophagus should be investigated. Do not give chemical antidotes. Asphyxia from glottal edema may occur. Marked decrease in blood pressure may occur with moist rales, frothy sputum, and high pulse pressure. Treat symptomatically.

5. FIRE-FIGHTING MEASURESSuitable extinguishing media

Use extinguishing measures that are appropriate to local circumstances and the surrounding environment.

Unsuitable extinguishing media Caution: Use of water spray when fighting fire may be inefficient.

Specific hazards arising from the chemical

The product causes burns of eyes, skin and mucous membranes. Thermal decomposition can lead to release of irritating and toxic gases and vapors. In the event of fire and/or explosion do not breathe fumes.

Explosion data

Sensitivity to Mechanical Impact None.

Sensitivity to Static Discharge None.

Protective equipment and precautions for firefighters

As in any fire, wear self-contained breathing apparatus pressure-demand, MSHA/NIOSH (approved or equivalent) and full protective gear.

6. ACCIDENTAL RELEASE MEASURESPersonal precautions, protective equipment and emergency procedures

Personal precautions Evacuate personnel to safe areas. Use personal protective equipment as required. Avoid contact with skin, eyes or clothing. Keep people away from and upwind of spill/leak.

Environmental precautions

Environmental precautions Do not allow into any storm sewer drains, lakes, streams, ponds, estuaries, oceans or other surface water bodies. Should not be released into the environment. Dispose of according to all local city, state and federal rules and regulations. See Section 12 for additional ecological information.

Methods and material for containment and cleaning up

Methods for containment Prevent further leakage or spillage if safe to do so.

Methods for cleaning up Dike far ahead of liquid spill for later disposal. Soak up with inert absorbent material. Take up mechanically, placing in appropriate containers for disposal. Clean contaminated surface thoroughly. Prevent product from entering drains. Dam up. After cleaning, flush away traces with water.

7. HANDLING AND STORAGEPrecautions for safe handling

Advice on safe handling Use personal protective equipment as required. Avoid contact with skin, eyes or clothing. Ensure adequate ventilation, especially in confined areas. In case of insufficient ventilation, wear suitable respiratory equipment. Use only with adequate ventilation and in closed systems.

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1

Conditions for safe storage, including any incompatibilities

Storage Conditions Keep container tightly closed in a dry and well-ventilated place. Keep out of the reach of children. Keep containers tightly closed in a dry, cool and well-ventilated place. Keep in properly labeled containers.

Incompatible materials Incompatible with strong acids and bases. Incompatible with oxidizing agents.

8. EXPOSURE CONTROLS/PERSONAL PROTECTIONControl parametersExposure Guidelines

Chemical Name	ACGIH TLV	OSHA PEL	NIOSH IDLH
2-(2-butoxyethoxy)ethanol 112-34-5	TWA: 10 ppm Inhalable fraction and vapor	-	-
2-butoxyethanol 111-76-2	TWA: 20 ppm	TWA: 50 ppm TWA: 240 mg/m ³ (vacated) TWA: 25 ppm (vacated) TWA: 120 mg/m ³ (vacated) S* S*	IDLH: 700 ppm TWA: 5 ppm TWA: 24 mg/m ³
Sodium Hydroxide 1310-73-2	Celling: 2 mg/m ³	TWA: 2 mg/m ³ (vacated) Celling: 2 mg/m ³	IDLH: 10 mg/m ³ Celling: 2 mg/m ³

NIOSH IDLH Immediately Dangerous to Life or Health

Other Information Vacated limits revoked by the Court of Appeals decision in AFL-CIO v. OSHA, 965 F.2d 962 (11th Cir., 1992).

Appropriate engineering controls

Engineering Controls Showers, Eyewash stations & Ventilation systems.

Individual protection measures, such as personal protective equipment

- Eye/face protection** Tight sealing safety goggles. Wear a face shield if splashing hazard exists.
- Skin and body protection** Wear impervious protective clothing, including boots, gloves, lab coat, apron or coveralls, as appropriate, to prevent skin contact.
- Respiratory protection** If exposure limits are exceeded or irritation is experienced, NIOSH/MSHA approved respiratory protection should be worn. Positive-pressure supplied air respirators may be required for high airborne contaminant concentrations. Respiratory protection must be provided in accordance with current local regulations.

General Hygiene When using do not eat, drink or smoke. Keep away from food, drink and animal feeding stuffs. Contaminated work clothing should not be allowed out of the workplace. Regular cleaning of equipment, work area and clothing is recommended. Avoid contact with skin, eyes or clothing. Take off all contaminated clothing and wash it before reuse. Wear suitable gloves and eye/face protection.

9. PHYSICAL AND CHEMICAL PROPERTIESInformation on basic physical and chemical properties

Physical state Liquid
Appearance Clear Violet
Color Violet
Odor Sassafras
Odor threshold No information available

<u>Property</u>	<u>Values</u>	<u>Remarks • Method</u>
pH	12.5 - 13.5	
Specific Gravity	1.017	

Viscosity	<25 cP @ 25°C	
Melting point/freezing point	No Information available	
Flash point	None	
Boiling point / boiling range	100 °C / 212 °F Degrees	
Evaporation rate	No Information available	
Flammability (solid, gas)	No data available	
Flammability Limits in Air		Not Applicable
Upper flammability limit:	No Information available	
Lower flammability limit:	No Information available	
Vapor pressure	No Information available	
Vapor density	No Information available	
Water solubility	Complete	
Partition coefficient	No Information available	
Autoignition temperature	No Information available	
Decomposition temperature	No Information available	

Other Information

Density Lbs/Gal	8.5
VOC Content (%)	0

10. STABILITY AND REACTIVITYReactivity

No data available

Chemical stability

Stable under recommended storage conditions.

Possibility of Hazardous Reactions

None under normal processing.

Conditions to avoid

Exposure to air or moisture over prolonged periods.

Incompatible materials

Incompatible with strong acids and bases. Incompatible with oxidizing agents.

Hazardous Decomposition Products

Thermal decomposition can lead to release of irritating and toxic gases and vapors.

11. TOXICOLOGICAL INFORMATIONInformation on likely routes of exposure

Product Information	The primary effects and toxicity of this material are due to it corrosive nature.
Inhalation	Avoid breathing vapors or mists. Breathing of vapor can cause respiratory irritation and inflammation. Breathing of mist or liquid can cause burns to the respiratory tract.
Eye contact	Avoid contact with eyes. Corrosive. Causes severe eye damage.
Skin Contact	Avoid contact with skin. Corrosive. Contact with skin may cause severe irritation and burns. Prolonged or repeated contact may cause absorption to the skin.
Ingestion	Ingestion causes acute irritation and burns to the mucous membranes of the mouth, trachea, esophagus and stomach. Ingestion may result in the absorption of potentially harmful amounts leading to possible liver and kidney damage.

Component Information

Chemical Name	Oral LD50	Dermal LD50	Inhalation LC50
2-(2-butoxyethoxy)ethanol 112-34-6	= 5660 mg/kg (Rat)	= 2700 mg/kg (Rabbit)	-
2-butoxyethanol	= 470 mg/kg (Rat)	= 99 mg/kg (Rabbit)	= 486 ppm (Rat) 4 h = 450 ppm (

111-76-2			Rat 14 h
Sodium Metasilicate 6834-92-0	> 1153 mg/kg (Rat)	-	-
Surfactant Blend	> 2000 mg/kg (Rat)	> 2000 mg/kg (Rat)	-

Information on toxicological effects

Symptoms No Information available.

Delayed and immediate effects as well as chronic effects from short and long-term exposure

Corrosivity Causes burns. Extremely corrosive and destructive to tissue. Risk of serious damage to eyes.

Sensitization No Information available.

Germ cell mutagenicity No Information available.

Carcinogenicity The table below indicates whether each agency has listed any ingredient as a carcinogen.

Chemical Name	ACGIH	IARC	NTP	OSHA
2-butoxyethanol 111-76-2	A3	Group 3	-	-

ACGIH (American Conference of Governmental Industrial Hygienists)

A3 - Animal Carcinogen

IARC (International Agency for Research on Cancer)

Group 3 - Not classifiable as a human carcinogen

Reproductive toxicity No Information available.

STOT - single exposure No Information available.

STOT - repeated exposure No Information available.

Chronic toxicity

Chronic exposure to corrosive fumes/gases may cause erosion of the teeth followed by jaw necrosis. Bronchial irritation with chronic cough and frequent attacks of pneumonia are common. Gastrointestinal disturbances may also be seen. Avoid repeated exposure. Possible risk of irreversible effects. May cause adverse effects on the bone marrow and blood-forming system. May cause adverse liver effects.

Target organ effects

Blood, Central nervous system, EYES, hematopoietic system, Kidney, Liver, Respiratory system, Skin.

Aspiration hazard No Information available.

Numerical measures of toxicity - Product Information

Unknown Acute Toxicity 0.02% of the mixture consists of ingredient(s) of unknown toxicity

The following values are calculated based on chapter 3.1 of the GHS document .

ATEmix (oral) 14,372.00

ATEmix (dermal) 20,318.00

ATEmix (inhalation-dust/mist) 75.00

12. ECOLOGICAL INFORMATIONEcotoxicity

0.02% of the mixture consists of components(s) of unknown hazards to the aquatic environment

Chemical Name	Algae/aquatic plants	Fish	Crustacea
2-(2-butoxyethoxy)ethanol 112-34-5	100: 96 h Desmodesmus subspicatus mg/L EC50	1300: 96 h Lepomis macrochirus mg/L LC50 static	2850: 24 h Daphnia magna mg/L EC50 1000: 48 h Daphnia magna mg/L EC50
2-butoxyethanol 111-76-2	-	1490: 96 h Lepomis macrochirus mg/L LC50 static 2950: 96 h Lepomis macrochirus mg/L LC50	1698 - 1940: 24 h Daphnia magna mg/L EC50 1000: 48 h Daphnia magna mg/L EC50
Sodium Metasilicate 6834-92-0	-	210: 96 h Brachydanlo rerio mg/L LC50 semi-static 210: 96 h Brachydanlo rerio mg/L LC50	218: 96 h Daphnia magna mg/L EC50
Surfactant Blend	-	1.2: 96 h Oncorhynchus mykiss mg/L LC50	5.3: 48 h Daphnia mg/L LC50
Tetrasodium EDTA 64-02-8	1.01: 72 h Desmodesmus subspicatus mg/L EC50	59.8: 96 h Pimephales promelas mg/L LC50 static 41: 96 h Lepomis macrochirus mg/L LC50 static	610: 24 h Daphnia magna mg/L EC50
Sodium Hydroxide	-	45.4: 96 h Oncorhynchus mykiss	-

1310-73-2 Trisodium nitrotriacetate 5064-31-3	560 - 1000: 96 h <i>Chlorella vulgaris</i> mg/L EC50	93 - 170: 96 h <i>Pimephales promelas</i> mg/L LC50 flow-through 252: 96 h <i>Lepomis macrochirus</i> mg/L LC50 560 - 1000: 96 h <i>Oryzias latipes</i> mg/L LC50 semi-static 72 - 133: 96 h <i>Oncorhynchus mykiss</i> mg/L LC50 static 560 - 1000: 96 h <i>Poecilia</i> <i>reticulata</i> mg/L LC50 560 - 1000: 96 h <i>Poecilia reticulata</i> mg/L LC50 semi-static 470: 96 h <i>Pimephales</i> <i>promelas</i> mg/L LC50 static 175 - 225: 96 h <i>Lepomis macrochirus</i> mg/L LC50 static 560 - 1000: 96 h <i>Oryzias latipes</i> mg/L LC50 114: 96 h <i>Pimephales promelas</i> mg/L LC50	560 - 1000: 48 h <i>Daphnia magna</i> mg/L LC50
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Persistence and degradability

No Information available.

Bioaccumulation

Bioaccumulative potential.

Chemical Name	Partition coefficient
2-butoxyethanol 111-76-2	0.61

Other adverse effects

No Information available

13. DISPOSAL CONSIDERATIONS**Waste treatment methods****Disposal of wastes**

Disposal should be in accordance with applicable regional, national and local laws and regulations.

Contaminated packaging

Do not reuse container.

This product contains one or more substances that are listed with the State of California as a hazardous waste.

14. TRANSPORT INFORMATION

The basic description below is specific to the container size. This information is provided for at a glance DOT information. Please refer to the container and/or shipping papers for the appropriate shipping description before tendering this material for shipment. For additional information, please contact the distributor listed in section 1 of this SDS.

DOT

Not regulated

TDG

Not regulated

15. REGULATORY INFORMATION

4 % VOC content is CARB EXEMPT as LVP.

International Inventories

TSCA

Complies

DSL/NDL

Complies

Legend:

TSCA - United States Toxic Substances Control Act Section 8(b) Inventory

DSL/NDL - Canadian Domestic Substances List/Non-Domestic Substances List

US Federal Regulations

Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1**SARA 313**

Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA). This product contains a chemical or chemicals which are subject to the reporting requirements of the Act and Title 40 of the Code of Federal Regulations, Part 372

Chemical Name	SARA 313 - Threshold Value %
E-(2-butoxyethoxy)ethanol - 112-34-5	1.0
E-butoxyethanol - 111-76-2	1.0

SARA 311/312 Hazard Categories

Acute health hazard	Yes
Chronic Health Hazard	Yes
Fire hazard	No
Sudden release of pressure hazard	No
Reactive Hazard	No

CWA (Clean Water Act)

This product contains the following substances which are regulated pollutants pursuant to the Clean Water Act (40 CFR 122.21 and 40 CFR 122.42)

CERCLA

This material, as supplied, contains one or more substances regulated as a hazardous substance under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) (40 CFR 302)

US State Regulations**California Proposition 65**

This product has been evaluated and does not require warning labeling under California Proposition 65.

U.S. State Right-to-Know Regulations

Chemical Name	New Jersey	Massachusetts	Pennsylvania
2-(2-butoxyethoxy)ethanol 112-34-5	X	-	X
2-butoxyethanol 111-76-2	X	X	X
Sodium Hydroxide 1310-73-2	X	X	X
Trisodium nitriolacetate 5064-31-3	-	X	-

U.S. EPA Label Information

EPA Pesticide Registration Number Not Applicable

D2A - Very toxic materials

D2B - Toxic materials

Non-controlled

16. OTHER INFORMATION

NFPA	Health hazards 3	Flammability 1	Instability 0	Physical and Chemical Properties -
HMS	Health hazards 3	Flammability 1	Physical hazards 0	Personal protection B

Issue Date 25-Nov-2019

Revision Date 08-Mar-2018

Revision Note

No Information available

Disclaimer

The information provided in this Safety Data Sheet is correct to the best of our knowledge, information and belief at the date of its publication. The information given is designed only as a guidance for safe handling, use, processing, storage, transportation, disposal and release and is not to be considered a warranty or quality specification. The information

o Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 19

relates only to the specific material designated and may not be valid for such material used in combination with any other materials or in any process, unless specified in the text.

End of Safety Data Sheet



VERANO™

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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License Type: Integrated Facility


Exhibit 21 – Production and Manufacturing Process

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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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License Type: Integrated Facility

Introduction

In accordance with **Rule 538-x-6-.04**, using documented good quality practices and meeting current Good Manufacturing Practices, the Applicant will process cannabis into an approved medical cannabis product that will: (1) Be shown to meet intended levels of purity; (2) Be shown to be reliably free of toxins and contaminants; (3) Contain no additives other than pharmaceutical grade excipients; (4) Not be processed into a form that is attractive to or targets children; and (5) As to all gelatinous cube, cuboid, and lozenge medical cannabis products, conform to the universal flavor established by the Commission under § 20-2A-63(f), Code of Alabama 1975 (as amended), which is peach. Similarly, the Applicant will adhere to the rules and regulations for Packaging and Labeling medical cannabis set forth at **Rule 538-x-6-.05**. The Applicant will also maintain at all times the standards and practices set forth in the business plan and operating plan submitted to the Commission at the time of application or as thereafter amended.

21.1 Approved Types of Medical Cannabis Produced at Facility

The Applicant will only manufacture medical grade products grown and processed within the State of Alabama, in one of the approved forms set forth in § 20-2A-3(14), Code of Alabama 1975 (as amended), that contains a derivative of cannabis for medical use by a registered qualified patient pursuant to the Act and these Rules. Since the Applicant plans to



fully utilize the full authorization of its license, the Applicant will produce every type of medical cannabis product permitted in Alabama, as described in **§20-2A-3(14)**. More specifically, the Applicant will produce, using proprietary technologies and proven methods tested in various medical cannabis markets, the following medical cannabis products:

These medical cannabis products will

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be transferred and sold to qualifying patients and professional caregivers at the Applicant's Dispensing sites, as well as additional licensed dispensing sites throughout the state of Alabama. The Applicant will process in-house cultivated cannabis, as well as cannabis cultivated by cultivation licenses throughout



the state. In addition to cultivators' cannabis, the Applicant will also process cannabis into medical cannabis products from processing licenses throughout the state that cannot create the same medical cannabis products at their own facilities. The Applicant will produce the aforementioned medical cannabis products at its cultivation and processing facility

21.2 Manufacturing Processes and Methods to Produce each Product

The Applicant's manufacturing processes and methods are broken into two phases: (1) extraction and refinement; and (2) formulation. For each, the Applicant meticulously details the machinery, equipment, materials, and personnel necessary.

21.2.1 Extraction

The Applicant will perform three types of extractions:

. The starting material for all extraction processes includes the premium cannabis flower that the Applicant will produce from it cannabis acquired from other licensees.

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21.2.2 Formulation

The formulation process for all medical cannabis products manufactured by the Applicant begins with extracted cannabis oil (as described above) that has been tested and verified for accurate cannabinoid potency and purity.

21.2.2.1

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process.

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21.2.3 In-Process Testing Requirements for all Medical Cannabis

The Applicant will conduct in-process quality assurance testing multiple times throughout the production and manufacturing process.

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In-process testing will allow the applicant to stop production or update manufacturing protocols if consistency and the highest quality of medical cannabis is not met.

21.2.4 Packaging, and Labeling Requirements for all Medical Cannabis

After a batch of medical cannabis has been manufactured, the entire batch will be held in quarantine pending the results of State testing. Once state testing results have been verified, final packaging and/or labeling of the medical cannabis is completed, pursuant to **Rule 538-x-6-.05** and **§20-2A-63(e)**. Compliant packaged and labeled medical cannabis will then be stored in the secure vault awaiting transport to a licensed dispensary to be distributed to qualified patients throughout the state.

21.2.5 Recordkeeping Requirements for all Medical Cannabis

The Applicant will utilize _____ as a tool to stay compliant with inventory protocols through all processes of the Applicant's operations. _____ will be used during the Applicant's cultivation, processing, and manufacturing processes to enter all transactions into the statewide seed-to-sale tracking system operated by the AMCC including (1) inventory of all cannabis plants, immature and mature; (2) inventory of in-process cannabis; (3) inventory of medical cannabis products; (4) inventory of cannabis or medical cannabis in quarantine; (5) inventory of all incoming cannabis transferred from a licensed cultivator or processor; (6) in transit cannabis or medical cannabis being transported; and (7)

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inventory and documentation of cannabis or medical cannabis that were destroyed and disposed of at the integrated facility in compliance with 80-14-1-.17.

21.3 Professionally Rendered Floorplans

The professional rendered floorplans showing which portions of each of the Applicant’s facilities that are ascribed to a particular phase of integrated production – cultivation, processing, transporting, and dispensing – is attached hereto (identified as “Professionally Rendered Floorplans – Attachment to Exhibit 21, Section 21.3”). Dispensing will not take place at the medical cannabis manufacturing facility. Dispensing will occur at all five of the Applicant’s dispensing sites. Cultivation portions are shown in lime green. Processing portions are shown in blue. Transportation portions are shown in orange.

21.4 Plans to Ensure the Safety of Personnel and Facilities

The Applicant will take every measure to ensure the safety of personnel and facilities based on the types of processes proposed to be utilized. All agents in the cultivation, processing, and manufacturing areas are required to wear proper protective equipment, as well as make sure that all PPE is clean to avoid contaminating product with. Agents should be wearing scrubs, hair net/beard net, nitrile gloves, and protective eye wear any time they are in contact with product. If any of these items are contaminated those items should be cleaned or replaced before entering the processing and manufacturing area. The Applicant will have the following PPE available onsite for employees for the following uses:

PPE	Required Use
Hand Protection (e.g., protective gloves, nitrile gloves)	Where cut hazards or potential exposure to corrosive liquids, blood, chemicals, or other infections materials exist.
Head Protection (e.g., hard hats)	Where danger of falling objects exist.
Eye Protection (e.g., goggles or glasses)	Where risk of eye injuries exists, such as punctures, abrasions, contusions, or burns.
Face Protection (e.g., face shields)	Where danger of flying particles or materials exist.

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Foot Protection (e.g., steel-toed Boots)	Where risks of foot injury from corrosive, poisonous, or hot substances, or from falling objects, crushing, or penetrating actions exist.
Hearing Protection (e.g., ear plugs)	Where risks of hearing damage from occupational noise exist and exceed the acceptable sound levels of the OSHA Noise Standard.
Respiratory Protection (e.g., respirator, gas masks)	Where respiratory health risks exist from inhaling smoke, fumes, particulate matter, etc.
Clothing Protection (e.g., plastic aprons)	Where risk of splashing chemicals exists.

The Applicant’s Employee Safety Plan is designed in compliance with parallel OSHA standards and complies with the rules outlined in the Act and Commission Rules. A proactive, ongoing process to identify, assess, and mitigate hazards is a core element of any adequate safety and health program. Effective controls protect workers from workplace hazards; prevent injuries, illnesses, and incidents; minimize or eliminate safety and health risks, and help employers provide workers with safe and healthy working conditions. Controls are selected based on feasibility, effectiveness, and permanence. Once controls are implemented, the Applicant will evaluate their efficacy and update accordingly. The Applicant will establish and maintain standards, procedures, and requirements for hazardous and chemical waste product storage and disposal, and chemical storage that complies with Chapters 27 and 30 of Title 22, Code of Alabama, 1975.

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License Type: Integrated Facility

21.5 A Detailed List of Formulae and Ingredients for each Medical Cannabis Product

Below, the Applicant provides a detailed list of formulae and ingredients for each medical cannabis product, including a list of all excipients to be utilized in the manufacture of each product, and the purpose served by each. The Applicant’s medical cannabis products will contain no additives other than pharmaceutical grade excipients, pursuant to **Rule 538-x-6-.04-2.c**. The Applicant acknowledges that “excipients” is defined as inactive ingredients in medical cannabis, such as cooking agents, preservatives, and fillers, that serve as the inert vehicle or medium for the medial cannabis product, pursuant to **Rule 538-x-6-.02-2**. Similarly, as used below, “pharmaceutical grade” means manufactured to the same standard or grade as any active or inactive drug, biologic, reagent or other pharmaceutical, in accordance with Good Manufacturing Practices (GMP) and approved, conditionally approved or indexed by the Food and Drug Administration (FDA) or for which a chemical purity standard has been established by recognized compendia, in accordance with **Rule 538-x-6-.02-4**.

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Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 22 – Machinery and Equipment

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.

James A. Leventis

Printed Name of Verifying Individual

Chief Compliance Officer

Title of Verifying Individual



Signature of Verifying Individual

3/3/2023

Verification Date

22.1 Lease agreement demonstrating possessory interest in all machinery and equipment to be used in the cultivation and processing of medical cannabis.

The lease agreement demonstrating possessory interest in all machinery and equipment to be used in the cultivation and processing of medical cannabis is attached hereto and identified as “Machinery and Equipment Master Lease Agreement – Between Verano Alabama, LLC and Verano Holdings, LLC– Attachment to Exhibit 22, Section 22.1”).

22.2 Specifications and operations manuals of all machinery and equipment to be used in the cultivation and processing of medical cannabis.

The specifications and operations manuals for all machinery and equipment to be used in the cultivation and processing of medical cannabis for the facility identified in the terms of 22.1 above is attached hereto and identified as “Machinery and Equipment Specifications and Operations Manuals – Cultivation and Processing – Attachment to Exhibit 22, Section 22.2”).

Machinery and Equipment Master Lease Agreement – Between Verano Alabama, LLC and Verano Holdings, LLC– Attachment to Exhibit 22, Section 22.1

Master Equipment Lease Agreement

This Master Equipment Lease Agreement (as it may be amended from time to time, this "**Master Agreement**"), dated as of December 26, 2022, is entered into between VERANO HOLDINGS, LLC, a Delaware Limited Liability Company ("**Lessor**"), and VERANO ALABAMA, LLC, a Alabama Limited Liability Company ("**Lessee**").

RECITALS

WHEREAS, Lessor is in the business of leasing Cultivation, Processing, and Manufacturing Equipment for the Cannabis Industry;

WHEREAS, Lessee is in the business of Cannabis Cultivation, Processing, and Manufacturing (the "**Business**"); and

WHEREAS, Lessee desires to lease from Lessor, and Lessor desires to lease to Lessee, the Equipment (as hereinafter defined).

NOW, THEREFORE, in consideration of the mutual covenants and agreements hereinafter set forth and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the parties to this Master Agreement agree as follows:

ARTICLE I DEFINITIONS

Capitalized terms used in this Master Agreement have the meanings set forth in this ARTICLE I.

"**Action**" means any claim, action, cause of action, demand, lawsuit, arbitration, inquiry, audit, notice of violation, proceeding, litigation, citation, summons, subpoena, or investigation of any nature, civil, criminal, administrative, regulatory, or otherwise, whether at law or in equity.

"**Affiliate**" of a Person means any other Person that directly or indirectly, through one or more intermediaries, controls, is controlled by, or is under common control with, such Person. The term "control" (including the terms "controlled by" and "under common control with") means the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of a Person, whether through the ownership of voting securities, by contract, or otherwise.

"**Basic Rent**" means the rent specified in a Supplement to be paid by Lessee for any Unit of Equipment leased under such Supplement, as set forth in ARTICLE V hereof.

"**Business**" has the meaning set forth in the recitals.

"**Business Day**" means any day except Saturday, Sunday, or any other day on which commercial banks located in Alabama are authorized or required by applicable Law to be closed for business.

"Commencement Date" means the date specified in each Supplement as the commencement date for such Supplement.

"Damages" means losses, injury, death, damages, liabilities, claims, deficiencies, Actions, judgments, interest, awards, penalties, fines, costs, or expenses of whatsoever kind and nature, including reasonable attorneys' fees and the cost of enforcing any right to indemnification under this Master Agreement and any Supplement and the cost of pursuing any insurance providers.

"Equipment" means:

- (a) the equipment described in the Supplements executed by Lessor and Lessee;
- (b) Parts or components thereof;
- (c) ancillary equipment or devices furnished under this Master Agreement and any Supplement; and
- (d) all alterations, additions, and attachments thereto, including without limitation all mandatory modifications.

"Event of Default" has the meaning set forth in Section 14.01.

"Expiration Date" means the date specified in each Supplement as the expiration date for such Supplement.

"Force Majeure Event" has the meaning set forth in **Error! Reference source not found.**

"GAAP" means generally accepted accounting principles in the United States of America as in effect from time to time.

"Governmental Authority" means any federal, state, local, or foreign government or political subdivision thereof, or any agency or instrumentality of such government or political subdivision, or any self-regulated organization or other non-governmental regulatory authority or quasi-governmental authority (to the extent that the rules, regulations, or orders of such organization or authority have the force of Law), or any arbitrator, court, or tribunal of competent jurisdiction.

"Governmental Order" means any order, writ, judgment, injunction, decree, stipulation, award, or determination by any Governmental Authority.

"Holdover Rent" has the meaning set forth in Section 17.05.

"Indemnitees" has the meaning set forth in ARTICLE XV.

"Law" means any statute, law, ordinance, regulation, rule, code, constitution, treaty, common law, Governmental Order, other requirement, or rule of law of any Governmental Authority.

"Lease Payment Date" means the first day of each month.

"**Lessee**" has the meaning set forth in the preamble.

"**Lessee's Knowledge**" means the actual or constructive knowledge of any Lessee director, or officer, manager, or member, or other employee with knowledge of and responsibility for the operation and legal and financial affairs of the Business, after due inquiry.

"**Lessor**" has the meaning set forth in the preamble.

"**Lien**" means any mortgage, pledge, hypothecation, assignment (as security), deposit arrangement, encumbrance, lien (statutory or other), charge, or other security interest, or any preference, priority, or other security agreement or preferential arrangement of any kind or nature whatsoever having substantially the same economic effect as any of the foregoing.

"**Location**" for any Unit of Equipment means the site of such Unit of Equipment specified in the applicable Supplement.

"**Loss**" has the meaning set forth in Section 11.01.

"**Loss Payment**" has the meaning set forth in Section 11.02.

"**Loss Payment Date**" has the meaning set forth in Section 11.02.

"**Manufacturer**" means the manufacturer of any Unit of Equipment.

"**Master Agreement**" has the meaning set forth in the preamble.

"**Notice**" has the meaning set forth in **Error! Reference source not found.**

"**Parts**" means all components, parts, replacement parts, instruments, appurtenances, accessories, and other equipment of whatever nature which may now or from time to time be incorporated or installed in or attached to, or which were provided by the manufacturer with, any Unit of Equipment, including after temporary removal from such Unit of Equipment.

"**Permits**" means all permits, licenses, franchises, approvals, authorizations, registrations, certificates, variances, and similar rights obtained, or required to be obtained, from Governmental Authorities.

"**Person**" means any individual, partnership, corporation, trust, limited liability entity, unincorporated organization, Governmental Authority, or any other entity.

"**Rent**" means Basic Rent and any late payments owed under Section 5.03.

"**Representative**" means, with respect to any Person, any and all directors, officers, managers, members, employees, consultants, financial advisors, counsel, accountants, and other agents of such Person.

"**Stipulated Loss Value**" for any Unit of Equipment means the amount set forth in corresponding Supplement as of the date of determination.

"Taxes" mean any and all present or future income, stamp, or other taxes, levies, imposts, duties, deductions, charges, fees, or withholdings imposed, levied, withheld, or assessed by any Governmental Authority, together with any interest, additions to tax, or penalties imposed thereon and with respect thereto.

"Unit of Equipment" means an individual unit of Equipment.

ARTICLE II LEASE OF EQUIPMENT

Lease: Lessor hereby agrees to lease to Lessee, and Lessee hereby agrees to lease from Lessor, the Equipment. The lease of any Unit of Equipment is governed by the terms and conditions of this Master Agreement, as well as by the terms and conditions set forth in the applicable Supplement. If there is any inconsistency between the provisions of this Master Agreement and a Supplement, the provisions of the Supplement shall control as to the Units of Equipment leased thereunder.

ARTICLE III TRUE LEASE

Section 3.01 True Lease. The parties intend that this Master Agreement and each Supplement shall constitute a true lease under applicable Law. Lessor has title to the Equipment at all times. Lessee acquires no ownership, title, property, right, equity, or interest in the Equipment other than its leasehold interest solely as lessee subject to all the terms and conditions of this Master Agreement and each Supplement.

Section 3.02 Security Interest. The parties further intend and agree that, if this Master Agreement and any Supplement are recharacterized under applicable Law as a secured financing or a lease intended for security, this Master Agreement and the applicable Supplement shall be deemed a security agreement and Section 4.01 hereof shall be deemed to grant Lessor by Lessee a lien on and first priority security interest in the Equipment and all proceeds thereof, to secure the payment of Lessee's obligations under this Master Agreement and the applicable Supplement. Lessor and Lessee each agree to execute, acknowledge, deliver, file, and record, or cause to be executed, acknowledged, delivered, filed, and recorded such further documents (including without limitation UCC financing statements), and to do all such things and acts, necessary to ensure that such security interest would be a perfected first priority security interest under applicable Law.

ARTICLE IV NET LEASE AND TERMS OF AGREEMENT

Section 4.01 Net Lease. This is a net lease.

Section 4.02 No Setoff. Lessee's obligation to pay all Rent and other amounts under this Agreement is absolute and unconditional and is not subject to any abatement, counterclaim, defense, deferment, interruption, recoupment, reduction, or setoff for any reason whatsoever.

Section 4.03 Term. This Master Agreement shall remain in full force and effect until terminated with respect to all Equipment. The lease term with respect to any Unit of Equipment shall commence on the Commencement Date and, unless sooner terminated under this Master Agreement or the applicable Supplement, shall expire on the later of the Expiration Date or the date all Equipment under the applicable Supplement is returned to and accepted by Lessor in the condition required as set forth herein and in the applicable Supplement.

ARTICLE V RENT

Section 5.01 Basic Rent. In consideration of Lessee's right to possess and use any Unit of Equipment during the lease term of the applicable Supplement, Lessee shall pay Lessor the applicable Basic Rent in advance on each Lease Payment Date, except as otherwise provided in Section 5.02(b).

- (a) Basic Rent Amount of \$10,000.00 per month

Section 5.02 Payment Mechanics.

(a) Lessee shall pay all amounts due under this Master Agreement or any Supplement on the applicable due date in US dollars by wire transfer of immediately available funds in accordance with the wire transfer instructions set forth on Schedule 1 hereto.

(b) If any date on which a payment under this Master Agreement and the applicable Supplement becomes due and payable is not a Business Day, then Lessee shall make such payment on the next succeeding Business Day. Provided Lessee makes such payment on such next succeeding Business Day, no interest accrues on the amount of such payment from and after such scheduled due date.

Section 5.03 Late Payments. If Lessee does not pay any amount payable to Lessor under this Master Agreement or any Supplement within 30 days after the due date, Lessee shall pay to Lessor a late charge equal to the lower of (a) the maximum amount allowed by law and (b) the greater of (i) 7% of the late payment amount or (ii) \$1,500 for each day payment is overdue. Payment of any late charge does not excuse Lessee from any default under this Master Agreement or any Supplement.

ARTICLE VI EXCLUSION OF WARRANTIES

LESSOR MAKES NO WARRANTY WHATSOEVER, INCLUDING WITHOUT LIMITATION ANY (a) WARRANTY OF MERCHANTABILITY; (b) WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE; WARRANTY AGAINST INFRINGEMENT OF ANY PATENT, COPYRIGHT, TRADEMARK, TRADE SECRET, OR OTHER PROPRIETARY RIGHTS OF A THIRD PARTY; WHETHER ARISING BY LAW, COURSE OF DEALING, COURSE OF PERFORMANCE, USAGE OF TRADE, OR OTHERWISE.

ARTICLE VII LESSEE'S REPRESENTATIONS

Lessee represents and warrants for the benefit of Lessor that the statements contained in this ARTICLE VII are true and correct as of the date hereof.

Section 7.01 Organization and Qualification of Lessee. Lessee is a Limited Liability Company duly organized, validly existing, and in good standing under the Laws of the state of Alabama and has full corporate power and authority to own, operate, or lease the properties and assets now owned, operated, or leased by it and to carry on its Business as currently conducted. Lessee is duly licensed and qualified to do business and is in good standing in each jurisdiction in which the lease of each Unit of Equipment under this Master Agreement and the applicable Supplement makes such licensing and qualification necessary.

Section 7.02 Authority of Lessee. Lessee has full corporate power and authority to enter into this Master Agreement and each Supplement, to carry out its obligations hereunder and thereunder and to consummate the transactions contemplated hereby and thereby. The execution and delivery by Lessee of this Master Agreement and each Supplement, the performance by Lessee of its obligations hereunder and thereunder and the consummation by Lessee of the transactions contemplated hereby and thereby have been duly authorized by all requisite corporate action on the part of Lessee. This Master Agreement has been duly executed and delivered by Lessee, and constitutes a legal, valid, and binding obligation of Lessee enforceable against Lessee in accordance with its terms. When each Supplement to which Lessee is or will be a party has been duly executed and delivered by Lessee (assuming due authorization, execution, and delivery by each other party thereto), such Supplement will constitute a legal and binding obligation of Lessee enforceable against Lessee in accordance with its terms.

Section 7.03 No Conflicts. The execution, delivery, and performance by Lessee of this Master Agreement and each Supplement, and the consummation of the transactions contemplated hereby and thereby, do not and will not:

- (a) conflict with or result in a violation or breach of, or default under, any provision of the organizational documents of Lessee;
- (b) conflict with or result in a violation or breach of any provision of any Law;

(c) require notice to, the consent of, or other action by any Person or conflict with, result in a violation or breach of, or constitute a default under any instrument to which Lessee is a party or by which Lessee or its assets may be bound; or

(d) result in the creation or imposition of any Lien on any Unit of Equipment.

Section 7.04 Consents. No consent or approval of or permit, order or declaration by, or filing with, or notice to, any Governmental Authority is required by or with respect to Lessee in connection with the execution and delivery of this Master Agreement and the Supplements and the consummation of the transactions contemplated hereby and thereby.

Section 7.05 Legal Proceedings. There are no Actions pending or[, to Lessee's Knowledge,] threatened against or by Lessee:

(a) relating to or affecting the Business; or

(b) that challenge or seek to prevent, enjoin, or otherwise delay the transactions contemplated by this Master Agreement and the Supplements.

No event has occurred or circumstances exist that may give rise to, or serve as a basis for, any such Action.

Section 7.06 Permits. All Permits required for Lessee to conduct the Business as currently conducted and to lease and use the Equipment have been obtained by Lessee and are valid and in full force and effect. All fees and charges with respect to such Permits as of the date hereof have been paid in full. No event has occurred that, with or without notice or lapse of time or both, would reasonably be expected to result in the revocation, suspension, lapse, or limitation of any such Permit.

Section 7.07 Insurance Certificates. On or prior to the date of this Master Agreement, Lessee has provided Lessor with insurance certificates accurately evidencing that the insurance coverage required under Section 12.02 hereof is in effect and with insurance certificates accurately evidencing that the insurance coverage required as of the date of this Master Agreement under Section 12.01 hereof is in effect.

Section 7.08 Financial Statements. If not publicly available, Lessee has delivered complete copies of Lessee's financial statements for its most recent fiscal year and any other financial information of Lessee reasonably requested by Lessor. The financial statements are based on the books and records of the Business, and fairly present the financial condition of the Business as of the dates they were prepared and the results of the operations of the Business for the periods involved.

ARTICLE VIII LESSEE'S COVENANTS

Lessee agrees that until all amounts payable under this Master Agreement and the Supplements have been paid in full and all other obligations hereunder and thereunder have been performed in full, Lessee shall comply with the following covenants.

Section 8.01 Compliance with Law. Lessee shall comply with all applicable Law.

Section 8.02 Permits. Lessee shall maintain in full force and effect all Permits required for Lessee to conduct the Business as currently conducted and to lease and use each Unit of Equipment in the manner contemplated under this Master Agreement and the applicable Supplement.

Section 8.03 Taxes. Lessee shall pay, and indemnify and hold Lessor harmless from, all assessments, license fees, and sales, use, property, excise, and other taxes and charges (other than gross or net income taxes) imposed on or with respect to (a) the Equipment or any Part thereof arising out of or in connection with the shipment, possession, ownership, use, delivery, or operation of any Unit of Equipment, or (b) this Master Agreement and the Supplements or the consummation of the transactions contemplated herein and therein.

Section 8.04 Financial Statements.

(a) **Annual Financial Statements.** If not publicly available, Lessee shall during the term of this Master Agreement and any Supplement furnish Lessor, as soon as available, but in any event within 30 days after the end of each fiscal year of Lessee, a copy of the financial statements of Lessee for such year audited by independent certified public accountants of nationally recognized standing, and any other financial information of Lessee that Lessor may reasonably request from time to time.

(b) **Preparation of Financial Statements.** Lessee shall cause all financial statements furnished under this Section 8.04 to be complete and correct and prepared in reasonable detail, and in accordance with GAAP applied consistently throughout the periods reflected therein and with prior periods.

Section 8.05 Liens. Lessee shall keep the Equipment free and clear of all Liens. Lessee shall effect the removal of any such Lien immediately upon written notice thereof from Lessor or otherwise becoming aware of the existence of the Lien.

Section 8.06 Subleases. Lessee shall not enter into any sublease of any Unit of Equipment without Lessor's prior written consent, which consent may be withheld in Lessor's sole discretion. No permitted sublease shall relieve Lessee of its obligations under this Master Agreement and the applicable Supplement, and Lessee shall remain primarily liable under this Master Agreement and the applicable Supplement for the performance of all of the terms hereof and thereof to the same extent as if such Sublease had not occurred.

ARTICLE IX LESSEE'S USE OF EQUIPMENT

Section 9.01 Preparation of Location. On or prior to the Commencement Date for each Unit of Equipment, Lessee shall, at its expense, prepare a suitable site at the Location specified in the applicable Supplement for the installation of such Equipment. Lessee shall grant access to the Location as needed for the purpose of such installation. Lessee shall bear all installation charges, including third-party installation charges.

Section 9.02 Identifying Marks. Except as may be described in the applicable Supplement, no marking of any kind shall be placed on any Unit of Equipment by Lessee or any other Person except with the prior written consent of Lessor. Any such marking placed on a unit of Equipment by Lessee or another Person shall be removed at Lessee's expense on or before the Expiration Date of the applicable Supplement. Lessee shall, at Lessee's expense and to Lessor's satisfaction, place and maintain on each Unit of Equipment any identifying marks required by Lessor.

Section 9.03 Equipment Location. Lessee may not move any Unit of Equipment from its Location without Lessor's prior written consent.

Section 9.04 Personal Property. The parties intend that each Unit of Equipment remains at all times personal property and not a fixture under applicable Law, even if the Unit of Equipment, or any Part thereof, may be or become affixed or attached to real property or any improvements.

Section 9.05 Operation. Lessee shall operate each Unit of Equipment exclusively for cannabis cultivation, processing, and manufacturing in connection with its Business. Lessee shall not operate or permit the operation of any Unit of Equipment in an unsafe or improper manner.

Section 9.06 Unit of Equipment. Lessee shall lease all equipment detailed in Exhibit A Schedule of Equipment.

Section 9.07 Records. Lessee, at its own expense, shall:

(a) maintain all Equipment-related records, logs, and other materials ("**Records**") [in a manner no less careful, comprehensive, and accurate than Lessee's customary practices with respect to Lessee's similar equipment/using practices and with a degree of care, comprehensiveness, and accuracy consistent with industry practice], but in no event less than reasonable practices and a reasonable degree of care, comprehensiveness, and accuracy, and as required by applicable Law; and

(b) promptly furnish to Lessor such Records as may be requested by Lessor for any purpose.

Section 9.08 Inspection. Lessor's employees and agents shall have the right of access to Lessee's premises to inspect the Equipment and Lessee's Records on reasonable notice and during regular business hours.

ARTICLE X MAINTENANCE AND MANDATORY MODIFICATIONS

Section 10.01 Maintenance. Lessee, at its sole expense, shall maintain, service, and repair each Unit of Equipment and keep each Unit of Equipment:

- (a) in serviceable and operable condition, free of broken, damaged, or missing parts, suitable for the commercial use originally intended, and all maintenance, service, and repair of any Unit of Equipment and any Part thereof shall be done to standards and with parts of like kind and at least equal quality to items being maintained, serviced, or repaired;
- (b) in compliance with any vendor's or Manufacturer's specifications;
- (c) consistent with standard industry practice for similar equipment, Lessee's maintenance practices for its other similar equipment, and applicable insurance requirements; and
- (d) in compliance with applicable Law.

Section 10.02 Replacement of Parts. If during the term hereof and the lease term of any Supplement any Part of any Unit of Equipment is lost, stolen, damaged beyond repair, or otherwise permanently rendered unfit for use, Lessee, at its sole expense, shall promptly replace or cause to be replaced such Part with one or more replacement Parts. Lessee shall cause such Unit of Equipment after the replacement to be in as good an operating condition as, and have a value, remaining useful life, and utility at least equal to the value, remaining useful life, and utility of the Unit of Equipment before the replacement (assuming such Unit of Equipment to have been in the condition required by the terms of this Master Agreement and the applicable Supplement).

Section 10.03 Mandatory Modifications. Lessee, at its sole expense, shall make any alteration or modification to any Unit of Equipment, including without limitation the replacement or addition of any component, that is:

- (a) required or supplied by the Lessor; or
- (b) necessary to comply with applicable Law and Lessee shall notify Lessor within 10 days of learning that an alteration or modification is required by applicable Law.

Section 10.04 Title to Parts.

(a) If Lessee incorporates or installs any Part in or attaches any Part to a Unit of Equipment, including without limitation any replacement or addition under Section 10.03, then immediately on any Part becoming incorporated or installed in or attached to the Unit of Equipment, without further act or any cost to Lessor:

- (i) such Part is deemed part of the Unit of Equipment to the same extent as though originally incorporated or installed in or attached to the Unit of Equipment;

- (ii) title to such Part vests in Lessor; and
 - (iii) such Part becomes subject to this Master Agreement and the applicable Supplement.
- (b) Lessee shall cause all Parts to be free and clear of all Liens.

ARTICLE XI LOSS

Section 11.01 Risk of Loss. From the Commencement Date for a Unit of Equipment under the applicable Supplement through the expiration or earlier termination of the lease term of such Supplement as to such Unit of Equipment, Lessee shall bear all risk of loss, damage, destruction, theft, taking, confiscation, or requisition, partial or complete, of or to such Unit of Equipment or its use, however caused or occasioned ("**Loss**"). Lessee shall notify Lessor in writing within 10 days of learning of any such Loss.

Section 11.02 Material Impairment. If Lessor determines in its sole discretion that a Loss has materially impaired the Unit of Equipment affected or its use, Lessee shall pay, on Lessor's demand/within 10 days of notice by Lessor of such determination ("**Loss Payment Date**"), the following amounts (collectively, "**Loss Payment**"):

- (a) all Rent and other amounts due prior to the Loss Payment Date with respect to such Unit of Equipment; plus
- (b) the Stipulated Loss Value of the Unit of Equipment determined in accordance with the applicable Supplement.

This Master Agreement and the applicable Supplement shall terminate with respect to any materially impaired Unit of Equipment on receipt by Lessor of the corresponding Loss Payment. Upon such receipt and termination, Lessor shall deliver to Lessee a duly executed quitclaim bill of sale title to such Unit of Equipment to Lessee.

Non-Material Impairment. If Lessor determines in its sole discretion that a Loss has not materially impaired the Unit of Equipment affected or its use:

- (c) this Master Agreement and the applicable Supplement shall continue with respect to such Unit of Equipment as though no Loss had occurred; and
- (d) Lessee shall at its sole expense promptly repair or cause to be repaired such Unit of Equipment to the condition in which such Unit of Equipment is required to be maintained hereunder and under the applicable Supplement, to the satisfaction of Lessor, and, for the avoidance of doubt, there shall be no abatement of Rent or Rent credit for any period in which a Unit of Equipment is in a shop or otherwise out of operation in connection with any maintenance, repairs, or mandatory modifications under this ARTICLE XI or ARTICLE X hereof.

ARTICLE XII INSURANCE

Section 12.01 Property Insurance. From the Commencement Date for a Unit of Equipment under the applicable Supplement through the expiration or earlier termination of the lease term of such Supplement as to such Unit of Equipment, Lessee, at its sole expense, shall provide and maintain for such Unit of Equipment insurance against loss, theft, and damage ("**Property Insurance**") in:

(a) an insured amount at least the greater of the Stipulated Loss Value or full replacement value of such Unit of Equipment; and

(b) a form, and with companies, satisfactory to Lessor, including, without limitation, a Breach of Warranty Clause, the waiver of any subrogation rights against Lessor, and the insurer's agreement to give Lessor 30 days' prior written notice before cancellation or material change of the Property Insurance.

Lessee shall name Lessor (or shall cause Lessor to be named) as loss payee for the Property Insurance. Deductibles, if any, must be approved in advance by Lessor.

Section 12.02 Liability Insurance. For the term of this Master Agreement, Lessee, at its sole expense, shall provide and maintain commercial general liability insurance ("**Liability Insurance**"), in:

(a) an amount no less than \$5,000,000 for equipment loss and \$2,000,000/\$3,000,000 of commercial general liability coverages as are ordinarily procured by prudent Persons who operate similar equipment in similar businesses; and

(b) a form, and with companies satisfactory to Lessor, including without limitation, the policy shall be primary and non-contributory with insurance carried by Lessor and the insurer shall agree to give Lessor 30 days' prior written notice before cancellation or material change of the Liability Insurance.

Lessor shall be named as an additional insured without imposing on Lessor any expense in connection with the Liability Insurance.

Section 12.03 Insurance Certificates. On or before the Commencement Date for a Unit of Equipment under the applicable Supplement, Lessee shall provide Lessor with insurance certificates accurately evidencing that the Property Insurance required under Section 12.01 is in effect for such Unit of Equipment. Lessee shall provide Lessor with insurance certificates accurately evidencing the renewal of the Property Insurance and Liability Insurance required under this Master Agreement promptly upon such renewal. Lessee shall otherwise promptly provide Lessor with insurance certificates evidencing that the insurance coverage required under this Master Agreement is in effect as Lessor may request from time to time.

ARTICLE XIII

APPLICATION OF INSURANCE PROCEEDS AND CONDEMNATION PAYMENTS

Section 13.01 Amounts Received by Lessor. If Lessor receives any proceeds as loss payee of the Property Insurance, or under any condemnation proceeding related to the Equipment, it shall:

- (a) if received pursuant to a Loss that has materially impaired a Unit of Equipment under Section 11.02, credit such proceeds against Lessee's obligation to make Loss Payments to Lessor under Section 11.02 or if no such amounts are then due and outstanding, remit such proceeds to Lessee; or
- (b) if received pursuant to a Loss that has not materially impaired the Equipment under 0, remit the proceeds to Lessee.

If Lessee is in default under this Master Agreement or any Supplement, or an Event of Default has occurred and is continuing, Lessor may hold any such proceeds as security for the obligations of Lessee under this Master Agreement and the Supplements and apply such amounts in its sole discretion against Lessee's obligations under this Agreement and the Supplements.

Section 13.02 Amounts Received by Lessee.

- (a) If Lessee receives any proceeds under the Property Insurance, unless received with respect to a Loss that has not materially impaired the Equipment as set forth in Section 13.01(b), or under any condemnation proceeding related to the Equipment, Lessee shall promptly forward such amounts to Lessor to be applied by Lessor under Section 13.01.
- (b) If Lessee is in default under this Master Agreement or any Supplement, or an Event of Default has occurred and is continuing, and Lessee receives any proceeds under the Property Insurance (regardless of whether the Equipment is materially impaired) or the Liability Insurance, it shall forward such amounts to Lessor as security for the obligations of Lessee under this Master Agreement and the Supplements to be applied by Lessor in its sole discretion against Lessee's obligations under this Master Agreement and the Supplements.

ARTICLE XIV

DEFAULT

Section 14.01 Events of Default. Each of the following events is an "Event of Default" under this Master Agreement and all Supplements:

- (a) if Lessee fails to pay when due any Rent or any other amount under this Master Agreement or any Supplement;
- (b) if Lessee defaults in the observance or performance of any other term, covenant, or condition of this Master Agreement or any Supplement, on Lessee's part to be observed or performed after notice by Lessor to Lessee of such default if Lessee does not commence

within said period of 30 Business Days, or does not thereafter diligently prosecute to completion, the steps necessary to remedy such default.

(c) if Lessee fails to observe or perform any term, covenant, or condition on Lessee's part to be observed or performed under any agreement with Lessor other than this Master Agreement and any Supplement;

(d) if Lessee's interest or any portion thereof in this Master Agreement or any Supplement devolves on or passes to any Person, whether by operation of law or otherwise;

(e) if Lessee (i) becomes insolvent, (ii) is generally unable to pay, or fails to pay, its debts as they become due, (iii) files, or has filed against it, a petition for voluntary or involuntary bankruptcy or pursuant to any other insolvency law, (iv) makes or seeks to make a general assignment for the benefit of its creditors, or (v) applies for, or consents to, the appointment of a trustee, receiver, or custodian for a substantial part of its property or business;

(f) if Lessee sells, transfers, or disposes of all or substantially all of its assets or the property of the Business, or merges or consolidates with any other entity; or

(g) if any representation contained in ARTICLE VII is untrue as and when made.

Section 14.02 Remedies. If an Event of Default occurs, Lessor may, in its sole discretion, exercise one or more of the following remedies:

(a) declare this Master Agreement and the Supplements in default;

(b) terminate in whole or in part this Master Agreement and the Supplements;

(c) take possession of, or render unusable, any Unit of Equipment wherever it may be located, without demand or notice, without any court order or other process of law, and without liability to Lessee for any damages occasioned by such action;

(d) require Lessee to deliver any Unit of Equipment in the condition required under this Master Agreement and the applicable Supplement to a location designated by Lessor and for each day that Lessee fails to return any Unit, Lessor may demand an amount equal to the Rent, prorated on the basis of a thirty-day month, in effect immediately prior to such Event of Default;

(e) proceed by court action to enforce performance by Lessee of this Master Agreement and any or all Supplements and/or to recover all damages and expenses incurred by Lessor by reason of any Event of Default;

(f) sell any or all of the Equipment at public or private sale, with or without notice to Lessee or advertisement, or otherwise dispose of, hold, use, operate, lease to others, or keep idle such Equipment, and without any duty to account to Lessee for such action or inaction or for any proceeds with respect thereto, and apply the net proceeds thereof (after deducting all expenses (including legal fees and costs) incurred in connection therewith) to the

amounts owed to Lessor under this Master Agreement and any Supplement; provided, however, that Lessee shall remain liable to Lessor for any deficiency that remains after any sale or lease of such Equipment; and

(g) exercise any other right or remedy available to Lessor at law, in equity, by statute, in any other agreement between the parties, or otherwise.

ARTICLE XV INDEMNITY

Indemnity. Lessee shall indemnify, defend, and hold harmless Lessor, its successors and assigns, and its Affiliates and their successors and assigns and the respective Representatives of Lessor, its successors and assigns, Lessor's Affiliates, and their successors and assigns (collectively, "**Indemnitees**") against any and all Damages incurred by Indemnitees relating to, arising out of, or in connection with the transactions contemplated by this Master Agreement and any Supplement, including without limitation:

(a) the selection, design, manufacture, delivery, purchase, acceptance, or rejection of any Unit of Equipment or the ownership of any Unit of Equipment;

(b) the lease, possession, maintenance, use, condition, repair, return, disposition, operation, storage, or transportation of any Unit of Equipment, any Parts, or any modifications thereto (including, without limitation, latent and other defects, whether or not discoverable by Lessor or Lessee), including without limitation any related pollution, contamination, environmental impairment, or similar condition;

(c) any inaccuracy in or breach of any of the representations of Lessee contained in this Master Agreement or any Supplement;

(d) any breach or non-fulfillment of any covenant, agreement, or obligation to be performed by Lessee pursuant to this Master Agreement or any Supplement; or

(e) any assertion of the infringement of patent, trade secret, trademark, copyright, or other intellectual property rights of third parties.

ARTICLE XVI LESSOR'S PERFORMANCE OF LESSEE'S OBLIGATIONS

If Lessee is in default or an Event of Default has occurred and is continuing, Lessor may, in its sole discretion 30 days prior written notice], make any payment or perform any obligation on behalf of Lessee or take any action that Lessor in Lessor's sole discretion deems necessary to maintain and preserve any or all Units of Equipment and Lessor's interests therein. Lessor's payment, performance of such obligation, or taking of such action shall not be a waiver by Lessor of any default or Event of Default or a release of Lessee by Lessor. Lessee shall pay immediately on demand to Lessor all sums so paid by Lessor and any expenses (including legal fees and costs) incurred by Lessor in connection with Lessor's payment, performance of such obligation, or taking of such action.

ARTICLE XVII RETURN OF EQUIPMENT

Section 17.01 Obligation to Return Equipment. For each Supplement, if Lessee does not in accordance with the terms and conditions thereof exercise any renewal option or purchase option that may be available thereunder, Lessee shall, at its sole expense and risk, no later than the expiration or earlier termination of the lease term of such Supplement for any Unit of Equipment leased pursuant to it, return such Unit of Equipment to [the return location set forth in such Supplement/a return location that shall be designated by Lessor in its sole discretion no fewer than 30 days prior to the expiration or earlier termination of such Supplement's lease term for such Unit of Equipment.

Section 17.02 Condition of Equipment on Return. Lessee shall cause any Unit of Equipment returned under this Master Agreement and any Supplement to be in:

- (a) as good condition as when delivered to Lessee and complete with all Parts, ordinary wear and tear excepted, including without limitation the removal of any marks that Lessee is permitted to apply to the Equipment under the applicable Supplement;
- (b) compliance with applicable Law.

Section 17.03 Return of Records. Upon the return of a Unit of Equipment under this Master Agreement and the applicable Supplement, Lessee shall deliver or cause to be delivered to Lessor all records relating to the operation and maintenance of the Unit of Equipment, including all maintenance records, logs, certificates, and data in Lessee's possession or required to be maintained by applicable Law.

Section 17.04 Storage Upon Return. Lessee shall, at its expense, on Lessor's prior written request, store any Unit of Equipment returned under this Article for a reasonable period not to exceed 30 business days, subject to the prior written consent of Lessor, at a facility located in Alabama selected by Lessee and used as a location for the storage of similar equipment.

During the storage period, Lessee shall comply with all of the terms and conditions hereof and of the applicable Supplement, except for the obligation to make payments of Rent.

Section 17.05 Holdover. If by the expiration or earlier termination of the lease term of a Supplement for a Unit of Equipment leased under it, Lessee does not return such Unit of Equipment to Lessor in the condition required by and otherwise in accordance with the terms and conditions of this Article and such Supplement, Lessee shall continue to comply with all the terms and conditions of this Master Agreement and such Supplement with respect to such Unit of Equipment, including without limitation the obligation to pay 125% of the prorated daily Rent for each day from the expiration or earlier termination of the lease term until the date on which Lessee returns such Unit of Equipment to Lessor in the manner required under this Article and the applicable Supplement ("**Holdover Rent**").

[SIGNATURE PAGE FOLLOWS]

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

VERANO ALABAMA, LLC

James Leventis

By _____

Name: James Leventis, Esq.

Title: Chief Compliance Officer

VERANO HOLDINGS, LLC

Trevor Seyller

By _____

Name: Trevor Seyller

Title: New Market Analyst

Machinery and Equipment Specifications and Operations Manuals – Cultivation and Processing – Attachment to Exhibit 22, Section 22.2

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CHAPTER 1 - INTRODUCTION

Confidential – Exempt from Public Disclosure

License Type: Integrated Facility

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License Type: Integrated Facility

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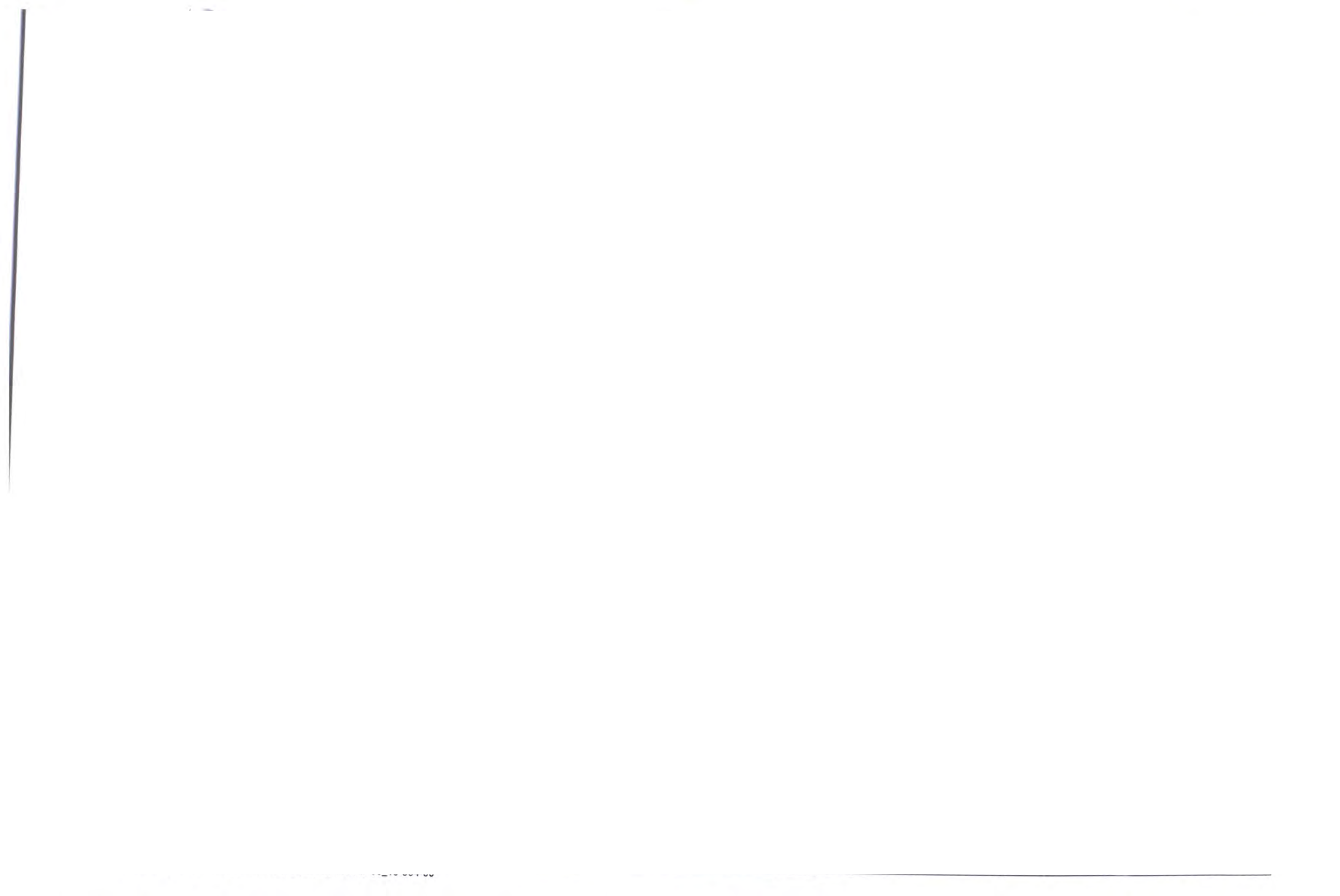
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Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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ALABAMA
LICENSING BOARD

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~~CHAPTER 11 - FINANCIAL STATEMENTS~~



RIN SERIES





































































































































































































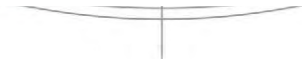


















Product Specification

DIMENSIONS WITH LAYOUT

OPTION ITEMS

OPTION ITEMS

Machinery Details

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1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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Exhibit 23: 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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Introduction

In coordination with any contracted Secure Transporter or State Testing Laboratory, the Applicant will utilize internally and METRC as the Statewide Seed-to-Sale-Tracking System to perform all shipping and receiving inclusive of cannabis waste, in accordance with **Rule 538-x-7-.07.5**. Over 1 billion grams of complaint cannabis and medical cannabis has been successfully shipped and received. To ensure the success of the operation multiple Memorandums of Understanding contracts between dispensary, cultivation, integrated facilities, and secure transporters are currently in place. To prepare for the Applicant to perform secure transports, a 2016 Ford Transit secure transport vehicle has been purchased in Alabama specifically for this project. The Quality Director will retain responsibility to verify the following: (1) that individual batches of cannabis or medical cannabis have been tagged or otherwise identified and inserted in containers; (2) that batches and containers are QR coded or otherwise digitally coded, identifying at a minimum the licensee and facility of origin, the licensee and facility of destination, and the date of the State Testing Laboratory's last testing and approval; (3) that cannabis and medical cannabis is accompanied by a manifest and any other appropriate documentation, and that the information thereon is accurate and has been duly executed by the transporting licensee and the driver; and (4) that all information from the QR code relating to the cannabis or medical cannabis, as well as the date and time of shipment, has been logged into METRC. The Applicant's *Receiving and Shipping Plan* details how the Applicant will accomplish all items of and exceed the minimum required criteria of Exhibit 23. The bulk of the incoming and outgoing batch tracking will be managed and audited utilizing the METRC interface. The Applicant purchased and insured a 2016 Ford Transit secure transport vehicle in Alabama specifically for this project. The Applicant has obtained secure transporter insurance, vehicle, copies of insurance declaration pages, and license plate number. Two CDL carrying Secure Transporter Drivers are currently employed by the Applicant and are ready to start upon licensure. Drivers must be at least 21 years of age and at least five-plus years in cannabis transport operations, pursuant to **Rule 538-x-7-.03-2.c.(6)**, and a bachelor's degree or higher in logistics or related field are required with an active CDL license. In compliance with **Rule 538-x-7-.03-2.c.(1)**., provide Verified Written Consent to a state and

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national criminal background check shall also be obtained for each of the Secure Transporter Applicant's proposed drivers; upon request, all Secure Transporter Applicants and their employees must submit an ALEA Application to Review Alabama Criminal History Record Information (SBI Form 46). In compliance with **Rule 538-x-7-.03-2.c.(2)**., provide verification that they have not received a criminal conviction within the last eight years. It will be the duty of the Transportation Agent to maintain a complete understanding of all applicable state regulations for transporting cannabis and/or medical cannabis under the Act. Transportation Agents will be responsible for securing compliant delivery of cannabis and/or medical cannabis to licensed dispensing facilities and approved laboratories in the State of Alabama. Duties include compliance with **Chapter 7**, enforcement of rules to protect the shipment of cannabis, products, and cash, as well as the safety of personnel involved in the transportation, freight, and receiving of high-value assets. These individuals will be thoroughly trained and will be required to present a certified driving record prior to hire. Only individuals with an outstanding record will qualify for this role. These associates will be asked to perform daily inspections on STVs, maintain accurate trip logs for each delivery, display competency in all implemented routing and tracking software, compliantly Transportation and deliver cannabis and/or medical cannabis, deliver all transportation documentation to the Transportation Director, and clean and sanitize STVs after each use.

23.1 Compliance of Individual Batches of Cannabis being Received for Storage and/or Processing

The Applicant will receive incoming cannabis from cultivators (raw cannabis) and cannabis from processors (raw oil prior to formulation). At the time of receipt, the Applicant will implement processes developed in other markets to ensure that individual batches of cannabis being received for storage and/or processing were appropriately prepared, tagged (or otherwise identified), and inserted in containers. Pursuant to **§20-2A-65(b)(3)**, the Applicant will, in coordination with internal Secure Transporter Drivers (or third-party), ensure that the cannabis being received was transported in one or more sealed containers, not accessible while in transit, accompanied by QR Codes and manifest. Paperwork, including a Certificate of Analysis testing, supplied from the State Testing Laboratory, must accompany cannabis products received by the Applicant.

23.2 Ensuring Incoming Batches and Containers have been QR coded

Pursuant to **Rule 538-x-6-.05-2.k.**, the Applicant will ensure that batches and containers arriving from a Cultivator, Processor, or Integrated Facility have labels that contain a digital image or QR Code for purposes of tracking cannabis and medical cannabis products and must interface with METRC. The Applicant will verify that the QR



coding or other approved digital coding on batches and containers of cannabis arriving from a Cultivator identify, at a minimum, the following: (1) The Cultivator's name; (2) The Cultivator's facility; (3) Plant tag identification number; (4) The date of harvest; (5) The date of the Cultivator's State Testing Laboratory approval; and (6) The expiration date (or, if no expiration date, a notation that the expiration date does not apply). Similarly, in accordance with **Rule 538-x-6-.05-2.o.**, the Applicant will verify that the QR coding or other approved digital coding on batches and containers of medical cannabis arriving from an Integrated Facility, or Processor, identify, at a minimum, the following: (1) The Cultivator, Processor, or Integrated Facility, by facility, from which the medical cannabis was sourced; (2) The name of the Processor/ Integrated Facility and the Processor's/ Integrated Facility's facility of origin; (3) The type of product; (4) The date of processing and packaging; (5) The date of the Processor's/ Integrated Facility's State Testing Laboratory testing approval; (6) The expiration date (or, if no expiration date, a notation that the expiration date does not apply); and (7) The Alabama Poison Control contact information as provided on the AMCC website.

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23.3 Ensure Incoming Cannabis and Medical Cannabis are Accompanied by the Secure Transporter’s Manifest and other Appropriate Documentation

The Applicant acknowledges that a “manifest” is a document listing the cargo and crew of a vehicle, for the review and use of state officials and the Applicant’s personnel, pursuant to **Rule 538-x-7-.07-1**. As such, the Applicant will coordinate with the Secure Transport Driver, of 3rd party Transporters, to ensure that before transporting cannabis or medical cannabis, the Transporter must: (1) Complete a manifest on a form approved by the Commission, and (2) Input the manifest to the Statewide Seed-to-Sale Tracking System, in accordance with **Rule 538-x-7-.07-2**. Similarly, the Applicant will require that the Secure Transporter enters the route plan and manifest into METRC, and a copy must be carried in the transporting vehicle and presented to a law enforcement officer upon request, pursuant to **§20-2A-65(b)(2)**. The Applicant’s Quality Director will, in compliance with **Rule 538-x-7-.07-3**., verify incoming cannabis and medical cannabis is accompanied by the Secure Transporter’s manifest and other appropriate documentation, that at a minimum contains the following: (a) The names of the driver, crewmember, and any other individuals onboard; (b) The name and address of the destination; (c) The weight and description of each individual package that is part of the shipment, and the total number of individual packages; (d) The date and time the cannabis or medical cannabis shipment is placed into the transport vehicle; (e) The date and time the shipment is accepted at the delivery destination; (f) The identity of the employee having custody of the cannabis or medical cannabis, and the circumstances, duration, and disposition of any other person who had custody or control of the shipment; and (g) Any handling or storage instructions. Upon delivery, the Applicant’s Quality Director will coordinate with the Secure Transporter to: (a) Verify and document the type and quantity of the transported cannabis and medical cannabis against the manifest; (b) Input the updated manifest to the Statewide Seed-to-Sale Tracking System; (c) Verify the information in the manifest and other appropriate documentation is accurate and has been duly executed by all appropriate parties; and (d) Sign the manifest and other documents demonstrating that delivery has been accomplished, in accordance with **Rule 538-x-7-.07-6**.. The Applicant will ensure that the manifest is signed by: (1) an authorized employee of the facility from which the cannabis or medical cannabis is being transported; (2) The Secure

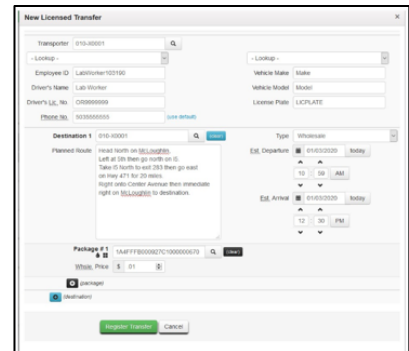
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Transporter Driver; and (3) An authorized employee of the Applicant (i.e. the Quality Director), in compliance with **Rule 538-x-7-.07-4**.

23.4 Logging Incoming Cannabis and Medical Cannabis Information into the Statewide-Seed-to-Sale Tracking System

Upon delivery, the Applicant’s Quality Director will coordinate with the Secure Transport Driver, or 3rd party Transporter, to ensure that all information from the QR code relating to the incoming cannabis and medical cannabis, as well as the date and time of arrival, has been logged into the _____ and METRC. The Applicant will also require that the Secure Transport Driver, or 3rd party Transporter, also log details regarding the product and the transport in the Statewide Seed-To-Sale Tracking System and/or the manifest relating to said transport, in accordance with **Rule 538-x-7-.02-3.c.(2)**.

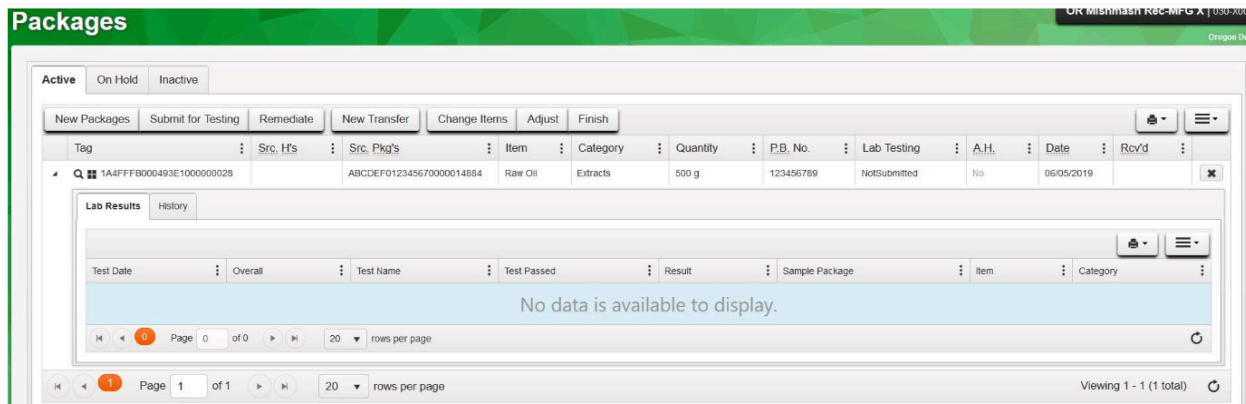


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License Type: Integrated Facility

23.5 Outgoing Batches of Cannabis and Medical Cannabis Compliance

The Applicant will service the majority of internal and external transfers but will contract with a Secure Transporter as a secondary option to transport cannabis and medical cannabis, in a safe, efficient and professional manner from and to the Applicant’s and other licensees’ facilities, pursuant to **Rule 538-x-7-.02-3.a**. Prior to transport, the Applicant will implement processes developed in other markets to ensure that batches of cannabis and medical cannabis products being shipped from a facility operated by the Applicant to a Dispensary or Cultivator by means of a Secure Transporter were appropriately packaged, labeled, and inserted in containers. Pursuant to **§20-2A-65(b)(3)**, the Applicant will ensure that batches of cannabis or medical cannabis products being shipped from the Applicant’s facilities are inserted and transported in one or more sealed containers and not be accessible while in transit. Also, the Applicant will coordinate with the contracted State Testing Laboratory to ensure that samples of cannabis and medical cannabis being sent for testing from the Applicant’s facilities are sealed into a locked tamper-evident container that shall not be accessible to the State Testing Laboratory transporter during transit, pursuant to **Rule 538-x-10-.03-3.b.(2)**.



Paperwork, including a Certificate of Analysis testing, supplied to the Applicant from the State Testing Laboratory, must accompany cannabis and medical cannabis products being shipped by the Applicant. Like the process and workflow of receiving cannabis outlined above, two of the Applicant’s employees will confirm the authenticity of the paperwork, the medical cannabis products will remain stored in a separate secure quarantine area near the

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shipping area and will remain isolated until the Certified Dispenser releases the medical cannabis products from quarantine.

The Applicant will ensure that individual batches of medical cannabis being shipped from the Applicant's facilities to a Dispensary or Cultivator were prepared such that the products are in accordance with **Rule 538-x-6-.04-2**. Similarly, the Applicant will ensure that all medical cannabis it ships to a Dispensary or Cultivator are medical grade, manufactured using documented good quality practices, and meet Good Manufacturing Practices, such that the product is shown to meet intended levels of purity and be reliably free of toxins and contaminants, pursuant to **§20-2A-63(c)(1)**. Additionally, the Applicant will verify that all the medical cannabis being shipped from its facilities to a Dispensary is packaged and labeled in accordance with **Rule 538-x-6-.05** and **§20-2A-63(e)**. The Applicant will also verify that all medical cannabis products it ships to a Dispensary has successfully passed all official tests by a State Laboratory Testing, as described in **§20-2A-66** and **Chapter 10** of the Commission's rules.

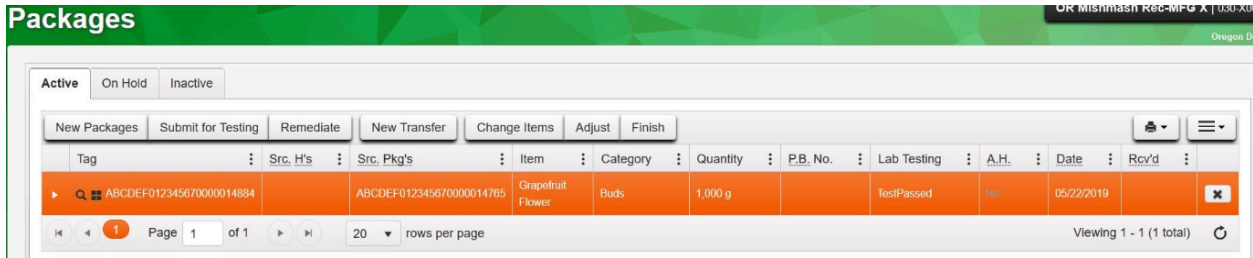
23.6 Ensuring Outgoing Batches and Containers are QR coded

The Applicant will comply with **Rule 538-x-6-.05-2.k.** and **Rule 538-x-6-.05-2.o.** As a Secure Transporter the Applicant will enter into the Statewide Seed-to-Sale Tracking System the route plans and manifests (containing information as set forth in Rule 538-x-7-.07) of any vehicle transporting cannabis or medical cannabis.

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All outgoing batches can be verified within METRC's Packages interface depicted below. The interface will allow the Applicant to review Active, On Hold, and Inactive packages.



23.7 Ensuring Outgoing Cannabis and Medical Cannabis is Accompanied by a Manifest

The Applicant will ensure that before transporting cannabis or medical cannabis, the Secure Transporter must: (1) Complete a manifest on a form approved by the Commission, and (2) Input the manifest to the Statewide Seed-to-Sale Tracking System, in accordance with **Rule 538-x-7-.07-2**. Similarly, the Applicant will require the route plan and manifest into the statewide seed-to-sale tracking system, and a copy must be carried in the transporting vehicle and presented to a law enforcement officer upon request, pursuant to **§20-2A-65(b)(2)**. The Applicant's Quality Director will verify outgoing cannabis and medical cannabis in compliance with **Rule 538-x-7-.07-3**.

The Applicant will ensure that Secure Transporters, delivering Applicant's cannabis and medical cannabis products, have standard operating procedure (SOPs) in place that require that, upon delivery, the Secure Transporter must coordinate with the receiving licensee to: (a) Verify and document the type and quantity of the transported cannabis and medical cannabis against the manifest; (b) Input the updated manifest to the Statewide Seed-to-Sale Tracking System; (c) Verify the information in the manifest and other appropriate documentation is accurate and has been duly executed by all appropriate parties; and (d) Sign the manifest and other documents demonstrating that delivery has been accomplished, in accordance with **Rule 538-x-7-.07-6**. The Applicant will ensure that the manifest is signed by: (1) an authorized employee of the Applicant's facility from which the cannabis or medical cannabis is being transported; (2) The Secure Transporter's driver; and (3) An authorized employee of the receiving facility, in compliance with **Rule 538-x-7-.07-4**.

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The Applicant acknowledges that, in accordance with **Rule 538-x-10-03-3.a. & b.**, a State Testing Laboratory is authorized, without the use of a Secure Transporter, to do the following: (1) Take cannabis or medical cannabis from, test cannabis or medical cannabis for, and return cannabis or medical cannabis only to a respective licensed facility; and (2) Collect a random sample of cannabis or medical cannabis at the premises of a cultivator, processor, dispensary, or integrated facility for testing. Similarly, a State Testing Laboratory carrying cannabis or medical cannabis are subject to the rules and regulations applicable to Secure Transporters as set forth in Chapter 7 of the Commission’s Rules. Thus, the Applicant’s Quality Director will verify outgoing cannabis and medical cannabis being sent for testing is accompanied by the State Testing Laboratory’s manifest and other appropriate documentation, that at a minimum identify the criteria outlined in **Rule 538-x-7-07-3**. The Applicant will verify that the State Testing Laboratory transporting samples of cannabis and medical cannabis follow the procedures outlined for Secure Transporters above, as applicable.

23.8 Logging Outgoing Cannabis and Medical Cannabis the Statewide-Seed-to-Sale Tracking System

The Applicant will also require that the contracted Secure Transporters also log details regarding the product and the transport in the Statewide Seed-To-Sale Tracking System and/or the manifest relating to said transport, in accordance with **Rule 538-x-7-02-3.b**. Similarly, for outgoing cannabis and medical cannabis being sent for testing by means of a State Testing Laboratory, the Applicant will ensure that the State Testing Laboratory will, at a minimum, monitor, track, and enter the information outlined in **Rule 538-x-10-04-14**. into the Statewide Seed-to-Sale Tracking System as to each sample to be tested, including, but not limited to: (1) The date and time the sample was obtained; (2) The date and time of shipment; and (3) The tag, lot, or batch number (and any other information contained on the digital or QR code) applicable to the cannabis or medical cannabis, as available, from which each sample was obtained. Likewise, the Applicant will

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ensure that at the time of transport, the State Testing Laboratory selecting a sample shall, using tamper-resistant products, record the name of the Applicant and facility providing the sample; the batch, lot, or production run number; and the weight or quantity of the sample, in accordance with **Rule 538-x-10-.03-3.b.(1)**.

Conclusion

In coordination with the Applicant's Secure Transport Drivers, contracted 3rd party Secure Transporters, and State Testing Laboratory, the Applicant has meticulously developed this *Receiving and Shipping Plan* that addresses and exceeds all items and the required criteria of Exhibit 23.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 24 – Secure Transport Vehicles

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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

Five Page Summary

The Applicant purchased and insured a 2016 Ford Transit secure transport vehicle in Alabama specifically for this project. A copy of the vehicle lease demonstrates possessory interest in the vehicle intended for secure transportation of cannabis and medical cannabis.

To meet and exceed the Commission expectations of potential Licensees, the Applicant has gone above and beyond to demonstrate financial and operational wherewithal.

By arranging a vehicle ready for transit, the Applicant optimizes the integrated facility license by operating as a secure transporter willing and able to perform cannabis and medical cannabis transport on behalf of the Applicant and other licensees. By purchasing and preparing the vehicle at this stage, the Applicant demonstrates the ability to go above and beyond the Commission’s expectations.

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-----End of Five Page Summary -----

24.1 Title, lease or other documentation demonstrating possessory interest in all vehicles to be used for secure transportation of cannabis or medical cannabis.



24.2 Copies of declarations pages of insurance policies

The following are copies of declarations pages of insurance policies applicable to all vehicles owned and operated by the Applicant, particularly those proposed for the secure transport of cannabis or medical cannabis.

The Applicant currently operates **158** cannabis transport vehicles in thirteen states. Each vehicle complies with insurance, security, and compliance standards in the most stringent of cannabis markets.

Vehicles to be Owned and Operated by the Applicant

The following list outlines the vehicles covered under the policy, including those in Alabama, Arizona, Connecticut, Florida, Illinois, Maryland, Michigan, New Jersey, Nevada, Ohio, Massachusetts, Pennsylvania, and West Virginia. The **Ford Transit** listed first currently resides in Alabama with an active Alabama plate, Alabama registration, insured, and compliant with the Alabama Public Safety Commission.

Vehicle #	Year	Make	Model	VIN	State
Alabama					
AL1	2018	FORD	Transit		AL
Arizona					
AZ1	2020	KIA	Sorrento		AZ
AZ2	2020	Ram	Promaster		AZ
AZ3	2018	Chevrolet	Sonic		AZ
AZ4	2020	RAM	Promaster		AZ
AZ5	2017	KIA	Soul		AZ
AZ6	2021	Hyundai	Tucson		AZ
AZ7	2021	Hyundai	Tucson		AZ
AZ8	2016	Dodge	Caravan		AZ
AZ9	2020	Kia	Forte		AZ
AZ10	2016	Ford	Escape		AZ
AZ11	2013	Ford	Transit Connect		AZ
AZ12	2015	RAM	Promaster		AZ

AZ13	2015	Mercedes	Sprinter	AZ
AZ14	2015	Nissan	Versa	AZ
AZ15	2018	KIA	Soul	AZ
AZ16	2017	KIA	Soul	AZ
AZ17	2016	KIA	Soul	AZ
AZ18	2015	FORD	Transit 250	AZ
AZ19	2000	Ford	Econoline	AZ
Connecticut				
CT1	2016	Nissan	NV1500	CT
CT2	2019	Nissan	NV1500	CT
CT3	2020	Nissan	NV1500	CT
CT4	2020	Nissan	NV1500	CT
Illinois				
IL1	2019	RAM	Promaster	IL
IL2	2019	RAM	Promaster	IL
IL3	2018	RAM	Promaster	IL
IL4	2018	RAM	Promaster	IL
IL5	2018	RAM	Promaster	IL
IL6	2020	RAM	Promaster	IL
IL7	2020	Mercedes	Sprinter	IL
IL8	2020	Mercedes	Sprinter/Carryall	IL

IL9	2020	Mercedes	Sprinter	IL
IL10	2017	Chevy	Box Truck	IL
IL11	2020	Mercedes	Sprinter	IL
IL12	2021	Mercedes	Sprinter/Cargo	IL
IL13	2021	Mercedes	Sprinter/Cargo	IL
IL14	2021	Mercedes	Sprinter Cargo	IL
IL15	2023	Mercedes	Sprinter 2500 High Roof	IL
IL16	2023	Mercedes	Sprinter 2500 High Roof	IL
Maryland				
MD1	2017	FORD	Transit	MD
MD2	2018	CHEVROLET	Express	MD
MD3	2018	FORD	Transit	MD
MD4	2019	RAM	1500	MD
MD5	2019	RAM	Promaster	MD
MD6	2018	CHEVROLET	Express	MD
MD7	2020	Mercedes	Sprinter	MD
MD8	2020	Mercedes	Sprinter	MD
MD9	2020	Ford	Transit	MD
MD10	2020	Ford	CG	MD
MD11	2020	Ford	CG	MD
MD12	2020	Ford	CG	MD

MD13	2020	Ford	CG	MD
Michigan				
MI1	2018	CHEVROLET	Express	MI
New Jersey				
NJ1	2020	RAM	Promaster	NJ
NJ2	2017	CHEVROLET	Express	NJ
NJ3	2020	Mercedes	Sprinter	NJ
NJ4	2022	Ford	Escape	NJ
NJ5	2022	Ford	Escape	NJ
NJ6	2022	Ford	Escape	NJ
NJ7	2022	Ford	Escape	NJ
NJ8	2022	Ford	Escape	NJ
NJ9	2022	Ford	Escape	NJ
NJ10	2021	Mercedes	Sprinter	NJ
Nevada				
NV1	2017	CHEVROLET	Equinox	NV
NV2	2019	RAM	Promaster	NV
NV3	2021	Nissan	Versa Sedan	NV
NV4	2021	Nissan	Versa Sedan	NV
NV5	2021	Nissan	Versa Sedan	NV
NV6	2022	Ram	Promaster	NV

NV7	2022	Ram	Promaster	NV
NV8	2010	Ford	Escape XLT	NV
NV9	2008	Toyota	Prius	NV
Ohio				
OH1	2020	Mercedes	Sprinter	OH
OH2	2019	RAM	Promaster	OH
Massachusetts				
MA1	2020	Mercedes	Sprinter	MA
MA2	2021	Mercedes	Sprinter	MA
MA3	2022	Mercedes	Sprinter	MA
Pennsylvania				
PA1	2019	Nissan	NV200	PA
PA3	2021	Mercedes	Sprinter	PA
PA2	2021	Mercedes	Metris	PA
PA4	2021	Mercedes	Metris	PA
PA5	2016	Isuzu	Box Truck	PA
PA1	2022	Mercedes	Metris	PA
PA3	2022	Mercedes	Metris	PA
PA2	2022	Mercedes	Metris	PA
West Virginia				

WV1	2018	Ford	CG	WV
Florida				
FL1	2018	Ford	Focus	FL
FL2	2018	Ford	Focus	FL
FL3	2018	Ford	Focus	FL
FL4	2018	Ford	Focus	FL
FL5	2020	Ford	Focus	FL
FL6	2018	Ford	Focus	FL
FL7	2018	Ford	Focus	FL
FL8	2018	Ford	Transit Van	FL
FL9	2018	Ford	EcoSport	FL
FL10	2018	Ford	EcoSport	FL
FL11	2018	Ford	EcoSport	FL
FL12	2019	Ford	EcoSport	FL
FL13	2019	Ford	EcoSport	FL
FL14	2019	Ford	EcoSport	FL
FL15	2019	Ford	Escape	FL
FL16	2019	Ford	Escape	FL
FL17	2019	Ford	Escape	FL
FL18	2019	Ford	Escape	FL
FL19	2019	Ford	Escape	FL

FL20	2020	Ford	Escape	FL
FL21	2020	Ford	Escape	FL
FL22	2020	Ford	T250 Van	FL
FL23	2020	Ford	Escape	FL
FL24	2020	Ford	Escape	FL
FL25	2020	Ford	Escape	FL
FL26	2020	Ford	Escape	FL
FL27	2020	Ford	Escape	FL
FL28	2020	Ford	Escape	FL
FL29	2020	Ford	Escape	FL
FL30	2020	Ford	Escape	FL
FL31	2020	Ford	Escape	FL
FL32	2020	Ford	Escape	FL
FL33	2020	Ford	Escape	FL
FL34	2020	Ford	Escape	FL
FL35	2020	Ford	Escape	FL
FL36	2020	Ford	Escape	FL
FL37	2020	Ford	Escape	FL
FL38	2020	Ford	Escape	FL
FL39	2020	Ford	Escape	FL
FL40	2020	Ford	Escape	FL

FL41	2020	Ford	Escape	FL
FL42	2020	Ford	Transit Van	FL
FL43	2020	Ford	Tran Con Van	FL
FL44	2020	Ford	Transit Van	FL
FL45	2021	Ford	Escape	FL
FL46	2021	Ford	Escape	FL
FL47	2021	Ford	Escape	FL
FL48	2021	Ford	Escape	FL
FL49	2021	Ford	T350HD VAN	FL
FL50	2021	Ford	EcoSport	FL
FL51	2021	Ford	EcoSport	FL
FL52	2021	Ford	EcoSport	FL
FL53	2021	Ford	EcoSport	FL
FL54	2021	Ford	EcoSport	FL
FL55	2021	Ford	EcoSport	FL
FL56	2021	Ford	EcoSport	FL
FL57	2021	Ford	EcoSport	FL
FL58	2021	Ford	EcoSport	FL
FL59	2021	Ford	EcoSport	FL
FL60	2021	Ford	EcoSport	FL
FL61	2022	Ford	Escape	FL

FL62	2022	Ford	Escape	FL
FL63	2022	Ford	Escape	FL
FL64	2022	Ford	Escape	FL
FL65	2022	Ford	Escape	FL
FL66	2022	Ford	Escape	FL
FL67	2022	Ford	Escape	FL
FL68	2022	Ford	Escape	FL
FL69	2022	Ford	Transit Cargo Van	FL
FL70	2022	Ford	Transit Cargo Van	FL

24.3 License plate numbers and DOT numbers, if available, for all secure transport vehicles.

DOT Numbers | The Gross Vehicle Weight Rating (GVWR) of the transport vehicle is below 26,000 pounds and exempt from getting a DOT intrastate number. The exemption applies to a Gross Combination Weight Rating (GCWR) under 26,000 pounds. The vehicle will not transport hazardous materials or waste nor be considered a passenger bus.

The following specifications document, provided by the dealership, indicates the 2016 Ford Transit GVWR is **5,270 pounds**. The applicant does not intend to transport more than 10-20 pounds of cargo at a time.

2016 Ford Transit Connect XL Cargo LWB Vehicle Options	
• 1 12V DC Power Outlet	• 1 Seatback Storage Pocket
• 15.8 Gal. Fuel Tank	• 150 Amp Alternator
• 1610# Maximum Payload	• 3.21 Axle Ratio
• 4-Way Driver Seat	• 4-Way Passenger Seat
• 4-Wheel Disc Brakes w/4-Wheel ABS, Front Vented Discs, Brake Assist and Hill Hold Control	• 60-Amp/Hr 590CCA Maintenance-Free Battery w/Run Down Protection
• Aero-Composite Halogen Headlamps	• Airbag Occupancy Sensor
• Analog Appearance	• Black Door Handles
• Black Manual Side Mirrors w/Convex Spotter and Manual Folding	• Black Side Windows Trim and Black Front Windshield Trim
• Cargo Space Lights	• Clearcoat Paint
• Cloth Door Trim Insert	• Curtain 1st Row Airbags
• Delay Off Interior Lighting	• Delayed Accessory Power
• Driver And Passenger Door Bins	• Driver Foot Rest
• Dual Stage Driver And Passenger Front Airbags	• Dual Stage Driver And Passenger Seat-Mounted Side Airbags
• Electric Power-Assist Steering	• Front And Rear Anti-Roll Bars
• Front Center Armrest w/Storage	• Front Cloth Headliner
• Front Cupholder	• Front Only Vinyl/Rubber Floor Covering
• Front-Wheel Drive	• Full Floor Console w/Storage, Full Overhead Console w/Storage and 1 12V DC Power Outlet
• Fully Galvanized Steel Panels	• Gas-Pressurized Shock Absorbers
• Gauges -inc: Speedometer, Odometer, Engine Coolant Temp, Tachometer and Trip Odometer	• Glove Box
• Gray Bodyside Moldings	• Gray Front Bumper
• GVWR: 5,270 lbs	• Gray Rear Bumper
• Immobilizer	• Immobilizer
• Manual Adjustable Front Head Restraints	• Low Tire Pressure Warning
• Manual Tilt/Telescoping Steering Column	• Manual Air Conditioning
	• Outboard Front Lap And Shoulder Safety Belts -inc: Height

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Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Exhibit 25 – Compliance with Alabama Public Service Commission Requirements

Verification

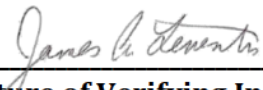
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

25.1 Compliance with Alabama Public Service Commission Requirements



STATE OF ALABAMA
PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130

TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JOHN A. GARNER, EXECUTIVE DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "CHIP" BEEKER, JR., ASSOCIATE COMMISSIONER

SERVED December 29, 2022
Walter Thomas, Jr.

VERANO ALABAMA, LLC d/b/a ZEN LEAF,
Applicant

DOCKET 33305
CERTIFICATE F5370

DECISION

By application December 20, 2022, the Applicant seeks a certificate as a common carrier of property. The Applicant also requests that the application be processed pursuant to the Federal Aviation Administration Authorization Act of 1994, which is codified at 49 U.S.C. 11501.

It appears from the application, and the materials filed with the application, that the Applicant is fit, willing and able to operate in compliance with the insurance requirements and the pertinent safety regulations, and that the Applicant has sufficient financial resources to commence operations.

Therefore, pursuant to the Commission's Order in Docket 24292, dated December 5, 1994, Motor Carrier Certificate F5370 is hereby issued to Verano Alabama, LLC d/b/a Zen Leaf, 415 N Dearborn Street, 4th Floor, Chicago, Illinois 60654, authorizing operations as a common carrier by motor vehicle, in intrastate commerce over irregular routes, in the transportation of:

Property, except household goods, between all points in the State of Alabama.

The certificate number may be located within the cab of the vehicles in lieu of placing it on the outside of the vehicles.

Jurisdiction in this proceeding will be retained for any Commission order or orders, including general orders, that may appear to be warranted in the future.

By the Commission,

Suellen Young
Suellen Young
Administrative Law Judge

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

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Confidential – Exempt from Public Disclosure

License Type: Integrated Facility

Exhibit 26 – Commercial Driver’s License

Verification

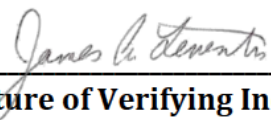
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James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual


Signature of Verifying Individual

12/25/2022

Verification Date

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

26.1 Introduction

As described throughout the application, the Applicant owns and will only use Transit *Connect* (manufactured by Ford) as their Secure Transportation Vehicles. As such, based on the Alabama commercial drivers license requirements, **the Applicant will not operate a vehicle that requires a Commercial Drivers License.**



While classes of Commercial Drivers License licenses can vary from state to state, Alabama classifies commercial vehicles that require a Commercial Drivers License to drive as follows:

- **Class A:** Operate vehicles weighing more than 26,001 pounds that tow trailers or other vehicles weighing over 10,000 pounds.
- **Class B:** Operate vehicles weighing more than 26,001 pounds and tow trailers or vehicles that weigh less than 10,000 pounds.
- **Class C:** Operate vehicles that can transport 16 or more people or vehicles that transport hazardous materials.

The Applicant's Ford Transit Connect **does not qualify** for A, B, nor C Classification.

Nonetheless, the Applicant's Secured Transport Drivers,

are both properly trained and possess Commercial Drivers Licenses. The Applicant's Secured Transport Drivers have successfully passed knowledge and skills tests to obtain their Commercial Drivers License, as evidenced by the copy of their current and active Commercial Drivers License below. These individuals have the requisite training and shall maintain compliance with all federal, state, and local laws applicable to them at all times while employed as a driver.

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

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26.2 Requisite Training

Training for drivers is a combination of classroom instruction and hands-on training. These programs familiarize drivers with transport vehicle systems and components. Drivers will learn to conduct an efficient pre-trip inspection following CDL requirements and become proficient in troubleshooting minor mechanical problems. Drivers develop advanced driving skills, including backing skills necessary to pass the Commercial Driver’s License test. These courses focus on the safe and proper handling of cannabis transport, both in restricted areas and on public streets and highways. Drivers receive exposure to many driving situations, such as two-lane roads and highways, security situations, communication issues, GPS malfunctions, product spoilage, temperature/ humidity issues, camera malfunctions, and engine issues.

26.2.1 Driver Training

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License Type: Integrated Facility

26.2.2 Cannabis Transport Training

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Transporter Training Checklist

Employee Name _____
Email _____

Phone Number _____
Start Date _____

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

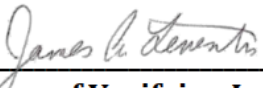
By signing below, the Applicant verifies that all vehicles and drivers have the requisite training and shall maintain compliance with all federal, state, and local laws applicable to them at all times while employed as a driver.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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Exhibit 27 – Fleet Summary

Verification

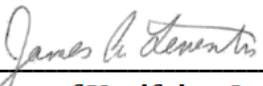
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James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

Introduction

The Applicant has provided a Fleet Summary showing the make, model, VIN Number, license plate number, and specifications of all vehicles proposed for the secure transport of cannabis or medical cannabis including, but not limited to, the design and specification of all areas in which cannabis or medical cannabis is to be stored.

27.1 Design and Specification for Transport Vehicles

The Applicant purchased and insured the following vehicle in Alabama specifically for this project. The vehicle will sit idle while the Commission evaluates Applicants. To meet and exceed the Commission expectations of potential Licensees, the Applicant has gone above and beyond to demonstrate financial and operational wherewithal.

Make: 2016 FORD - **Model:** TRANSIT CONNECT XL CARGO LWB **VIN Number:**

Specifications: Provided below:

2016 Ford Transit Connect XL Cargo LWB

Print Brochure

2016 Ford Transit Connect XL Cargo LWB Vehicle Options

- 1 12V DC Power Outlet
- 15.8 Gal. Fuel Tank
- 1610# Maximum Payload
- 4-Way Driver Seat
- 4-Wheel Disc Brakes w/4-Wheel ABS, Front Vented Discs, Brake Assist and Hill Hold Control
- Aero-Composite Halogen Headlamps
- Analog Appearance
- Black Manual Side Mirrors w/Convex Spotter and Manual Folding
- Cargo Space Lights
- Cloth Door Trim Insert
- Delay Off Interior Lighting
- Driver And Passenger Door Bins
- Dual Stage Driver And Passenger Front Airbags
- Electric Power-Assist Steering
- Front Center Armrest w/Storage
- Front Cupholder
- Front-Wheel Drive
- Fully Galvanized Steel Panels
- Gauges -inc: Speedometer, Odometer, Engine Coolant Temp, Tachometer and Trip Odometer
- Gray Bodyside Moldings
- Gray Grille
- GVWR: 5,270 lbs
- Integrated Roof Antenna
- Manual Adjustable Front Head Restraints
- Manual Tilt/Telescoping Steering Column
- Outside Temp Gauge
- Power 1st Row Windows w/Driver 1-Touch Down
- Redundant Digital Speedometer
- Side Impact Beams
- Sliding Rear Doors
- Split Swing-Out Rear Cargo Access
- Strut Front Suspension w/Coil Springs
- Torsion Beam Rear Suspension w/Coil Springs
- Variable Intermittent Wipers
- Wheels: 16" x 6.5" Steel w/XL Full Wheel Covers
- 1 Seatback Storage Pocket
- 150 Amp Alternator
- 3.21 Axle Ratio
- 4-Way Passenger Seat
- 60-Amp/Hr 590CCA Maintenance-Free Battery w/Run Down Protection
- Airbag Occupancy Sensor
- Black Door Handles
- Black Side Windows Trim and Black Front Windshield Trim
- Clearcoat Paint
- Curtain 1st Row Airbags
- Delayed Accessory Power
- Driver Foot Rest
- Dual Stage Driver And Passenger Seat-Mounted Side Airbags
- Front And Rear Anti-Roll Bars
- Front Cloth Headliner
- Front Only Vinyl/Rubber Floor Covering
- Full Floor Console w/Storage, Full Overhead Console w/Storage and 1 12V DC Power Outlet
- Gas-Pressurized Shock Absorbers
- Glove Box
- Gray Front Bumper
- Gray Rear Bumper
- Immobilizer
- Low Tire Pressure Warning
- Manual Air Conditioning
- Outboard Front Lap And Shoulder Safety Belts -inc: Height Adjusters and Pretensioners
- Perimeter/Approach Lights
- Radio w/Seek-Scan and Clock
- Seats w/Vinyl Back Material
- Single Stainless Steel Exhaust
- Spare Tire Stored Underbody w/Crankdown
- Steel Spare Wheel
- Tires: P215/55R16 97H XL AS -inc: full-size spare
- Urethane Gear Shifter Material
- Vinyl/Rubber Floor Trim
- Engine: 2.5L Duratec I4 -inc: Flexible Fuel Vehicle (FFV) system is standard equipment for vehicles shipped to Federal Emissions States or Cross Border State dealers and is only available w/a Federal emissions system (FFV system not available w/code 425 and requires code 936 or 423 if applicable for California Emissions State dealer destinations)

2016 Ford Transit Connect XL Cargo LWB Vehicle Description

Vehicle Disclaimer

We strive to make no mistakes in our listing, but errors are possible. Please confirm pricing, equipment & availability of vehicle. Pricing online are for our internet customers only. Prices does not include Sales Tax, Title, License Fee, Registration Fee, Dealer Documentary Fee, Finance Charges, Emission Testing Fees and Compliance Fees are additional to the advertised price. Unless the vehicle has remaining factory warranty it will fall under 1 of 2 1)implied 30 days or 1000 miles 50/50 drive train only 2)AS IS NO WARRANTY You may still purchase service contracts on most of our vehicles.

27.1.1 Vehicle Design Specifications

A diagram of the vehicle interior indicates the major alterations made for all cannabis secure transport vehicles within the fleet,

27.2 Design and Specifications for Cannabis Storage in Secure Transport Vehicle

Cannabis storage protocols comply with the requirements and restrictions of **§20-2A-65** and **Chapters 3, 7, and 10**. Secure and temperature-controlled transport vehicles will not bear markings or other indications of carrying cannabis or medical cannabis.



The Applicant currently operates **158** cannabis transport vehicles in thirteen states. Each vehicle complies with insurance, security, and compliance standards in the most stringent of cannabis markets. The Applicant will far exceed the requirements of §20-2A-65 and Chapters 3, 7, and 10 and implement meticulous security protocols perfected over the last decade of cannabis transport.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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License Type: Integrated Facility

Exhibit 28 – Care and Maintenance of Vehicles

Verification

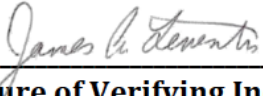
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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License Type: Integrated Facility

28.1 Introduction

Below are the Applicant's protocols for the care and maintenance of all vehicles proposed for the secure transport of cannabis and medical cannabis. The Applicant owns and will only use *Transit Connect* (manufactured by Ford) as their Secured Transportation Vehicles. As such, the following plan was developed custom for *Ford's* based on the manufacturer's recommendations, in collaboration with transportation experts.

28.2 Care of Vehicles

On a weekly basis (or as needed), the Applicant's employees will clean and sanitize the interior and exterior of vehicles using cleaning and care products recommended by Ford, with a preference toward organic and eco-friendly products. Additionally, the Applicant will have a professional clean the interior/exterior of the vehicles monthly (only when the vehicles do not carry any cannabis or medical cannabis).

28.2.1 Exterior Vehicle Care

Below is a meticulous account of the procedures the Applicant will follow to care for exterior vehicle parts on a weekly basis, including notes on preventing damage. **Washing Vehicle by Hand** - When washing the vehicles by hand, the Applicant will use a specially designated wash bay at its facility. Within the designated area of its facility, the Applicant will comply with the following procedure: (1) Use a mild cleaning agent, e.g. car shampoo; (2) Wash the vehicle with lukewarm water and a soft car sponge. When doing so, do not expose the vehicle to direct sunlight; (3) Carefully spray the vehicle with water and dry off with a leather cloth. Be careful not to point the water jet directly towards the air inlet grilles. The blower should be switched off while doing so; and (4) Do not let the cleaning agent dry on the paintwork. At the onset of winter, the Applicant will remove all traces of road salt deposits carefully and as soon as possible. **Wheels/rims** - Use water and acid-free wheel cleaner. Do not use acidic wheel cleaners to remove brake dust. To avoid corrosion of brake discs and brake pads, drive for a few minutes after cleaning before parking the vehicle. **Windows** - Clean windows inside and outside with a damp cloth and with a cleaning agent recommended by Ford. Do not use dry cloths or abrasive or solvent-based cleaning agents to clean the inside of windows.

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Wiper Blades - Carefully clean the folded-away wiper blades with a damp cloth. Do not clean the wiper blades too often. **Exterior Lighting** - Clean the lenses with a wet sponge and mild cleaning agent, e.g. car shampoo. Only use cleaning agents or cloths suitable for plastic lenses. **Sensors** - Clean the sensors in the front and rear bumper and in the radiator grill with a soft cloth and car shampoo. **Rear view camera and 360° Camera** - Remove traces of rust on the ball, e.g. with a wire brush. Remove dirt with a lint-free cloth. After cleaning, lightly oil or grease the ball head. Do not clean the ball neck with a power washer or solvent. **Sliding door** - Remove foreign objects from the vicinity of the contact plates and contact pins of the sliding door. Clean the contact plates and contact pins with a mild cleaning agent and a soft cloth. Do not oil or grease the contact plates and the contact pins. **Steps** - Clean the electrically operated steps and their housing with a power washer. After cleaning, spray the lateral guides with silicone spray. Clean the steps in the bumper with a power washer. Do not use oil or grease as a lubricant. **Aluminum Dropsides** - Brush down the aluminum dropsides with water and a neutral or mild alkaline cleaning agent. Do not use abrasive cleaning agents to clean the dropsides.

28.2.2 Interior Vehicle Care

The Applicant will take the following steps when caring for and sanitizing the vehicle's interior on a weekly basis: (1) Remove the Trash; (2) Vacuum the Interior; (3) Clean the Seats; (4) Identify and Remove Stains; (5) Clean the Dashboard; (6) Wash the Truck Ceiling; (7) Wash the Storage Compartments; (8) Wash the Steering Wheel and Gear Shifter; (9) Clean the Floor Mats; (10) Clean the Door Panels; and (11) Clean the Glass. When caring for specific parts of the vehicle's interior, the Applicant will follow the procedures below. **Seat belts** - Clean with lukewarm soapy water. Do not use chemical cleaning agents. Do not dry the seat belt by heating above 176°F or in direct sun-light. **Display** - Clean the surface carefully with a micro-fiber cloth and LC/TFT display care product. Switch off the display and let it cooldown. Do not use any other agents. **Plastic trim** - Clean with a damp microfiber cloth. Do not affix stickers, films or similar. **Real wood and trim elements** - Clean with a microfiber cloth. Do not use solvent-based cleaning agents, polishes, or waxes. **Headliner** - Clean with a soft brush or dry shampoo. **Cloth Seat covers** - Vacuum up dirt such as crumbs or dust and then use a damp microfiber cloth and a 1% soapsuds solution to clean the entire

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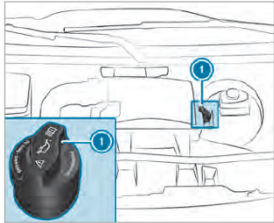
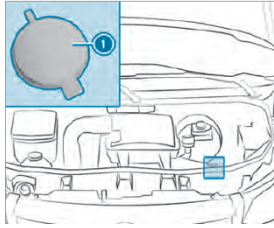
seat cover. Do not spot-clean. Do not use any oil-based cleaning and care products. **Steering wheel and gear or selected lever** - Clean with a damp cloth. **Pedals and floor mats** - Clean with a damp cloth. Do not use any cleaning and care products. **Vehicle Interior** - Clean with a damp cloth. Do not use a power washer. Allow the vehicle interior to dry completely after cleaning. Do not allow liquids to penetrate **Curtains** - The curtains may only be dry cleaned. Do not wash the curtains.

28.3 Maintenance of Vehicle

The Applicant's maintenance of vehicles falls into two categories: Preventative Maintenance and Demand maintenance. The preventive maintenance program will help the Applicant anticipate issues before they occur. Demand maintenance is the type of maintenance that the Applicant will perform only when there is a need for it, such as replacing or fixing certain vehicle parts only when they break down and stop working properly. The Applicant has developed and will use paper-based and electronic checklist forms to ensure vehicle maintenance is up to date and the reliable functioning of the vehicle. The maintenance checklists include the manufacturer's recommendations on vehicle maintenance, the approximate time when persons responsible should perform it, and more. The items on preventive maintenance checklist include: (1) Oil changes; (2) Filter changes; (3) Components tightening; (4) Tuning of the engine; (5) Brake fixing; (6) Tire rotation; (7) Lubrication; and (8) Radiator maintenance. Demand maintenance checklists will include items such as: (1) Replacing light bulbs; (2) Replacing springs; (3) Putting new window glass; (4) Retuning gauges; (5) Placing new window glasses; (6) Replacing seat cushions; (7) New engine and transmission; (8) New batteries; and (9) Replacing corroded or deteriorated structures. Vehicles will undergo monthly maintenance inspections by a vetted, certified Ford mechanic to ensure they remain in sound working condition. Additionally, the Applicant will contract to have comprehensive service and inspections performed at regular intervals pursuant to manufacturer's recommendations. The Applicant's vehicles will have an ASSYST PLUS service interval display on the instrument display that provides information on the remaining time or distance before the next service due date. The prescribed service interval is based on normal vehicle use. The Applicant will perform maintenance work more often than prescribed if the vehicle is operated under arduous conditions or increased loads.

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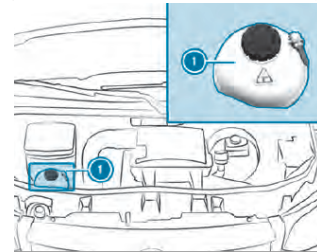
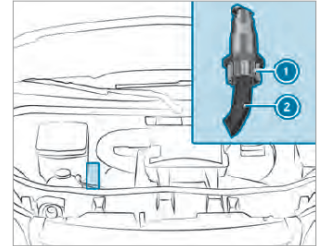
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The Applicant will use a certified Ford auto technician for all maintenance purposes. However, under circumstances that the Applicant is not able to have a professional conduct the vehicle maintenance, the Applicant will conduct maintenance following the procedures below. **Engine Oil** - The applicant will check the engine oil level using the on-board computer, or if necessary, oil dip stick. If the vehicle indicates that adding oil is required,

the Applicant will conduct the following: (a) Turn cap [1] counter-clockwise and remove

it; (b) Add engine oil; (c) Replace cap [1] and turn it clockwise until it engages; and (c) Check the oil level again using the on-board computer. **Coolant level** - The Applicant will allow the engine and the engine cooling system to cool down before checking the coolant level or refilling coolant. When checking coolant level, the Applicant will: (a) Park the vehicle on an even surface and open the hood; (b) Slowly turn coolant expansion reservoir cap half a turn counter-



clockwise and allow excess pressure to escape; (c) Turn coolant expansion reservoir cap [1] further and remove it; and (d) Check the coolant level. If the Applicant determines that adding coolant is required, the Applicant will: (a) Refill the approved coolant to the MAX mark on the coolant expansion reservoir; (b) Replace coolant expansion reservoir cap [1] and tighten in a clockwise direction; (c) Start the engine; (d) After approximately five minutes, switch off the engine again and allow it to cool down; and (e) Check the coolant level again and add coolant if necessary. **Adding Washer Fluid** - When adding washer fluid, the Applicant will: (a) Pre-mix the washer fluid in the correct mixing ratio in a container; (b) Park the vehicle on a level surface and secure it against rolling away; (c) Open the hood; (d) Pull the cap of the washer fluid container [1] upwards by the tab; (e) Pour in the pre-mixed washer fluid; (f) Press cap [1] onto the filler opening until it audibly engages; and (g) Close the hood.

Cleaning the water drain valve of the air intake box - When cleaning the water drain valve of the air intake box, the Applicant will: (a) Open the hood; (b) Remove dirt from water drain valve of air intake box. **Draining the Fuel Filter** - When the fuel filter requires draining, the Applicant will: (a) Park the vehicle in a safe location and secure it against rolling

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away; (b) Switch off the auxiliary heating; (c) Switch off the engine; (d) Open the hood; (e) Place a suitable collecting pan beneath drain hose [2]; (f) Switch on the ignition; (g) Open drain screw [1] until the water/fuel mixture emerges from drain hose [2]; (h) Close drain screw [1] as soon as around 0.2 qt (0.2 liter) of the water/fuel mixture has been collected. After 30 seconds, the electrical fuel pump automatically stops the discharge of the water/fuel mixture; (i) After draining, switch off the ignition; (j) Dispose of the collected water/fuel mixture in an environmentally responsible manner, e.g. at a qualified specialist workshop; (k) Check that drain screw [1] has been closed.; and (l) Close the hood. **Tires** – Tires will be replaced based on the manufacturer’s recommendation. Tire Pressure shall be checked prior to each transport. However, as mentioned earlier, the Applicant will always opt to have these processes conducted by a certified auto technician, unless otherwise not able to. The Applicant will maintain all records of vehicle maintenance for at least five years, and such records will be available for review by the Commission upon request. **Van Contents** include: roadside assistance kit, universal phone mount and phone charger, tire gauge, battery jumpstart, spare tire and jack, fire extinguisher, insurance card, vehicle registration, transporter certificate, four-way lug wrench, tire inflator, flashlight, dolly, product return logs w/ clipboard, pens, box cutter, hand sanitizer, dash cleaning wipes and glass cleaning wipes.

28.4 Conclusion

As shown above, the Applicant’s protocols for the care and maintenance of its vehicles will ensure cannabis and medical cannabis being transported are protected against physical, chemical, and microbial contamination. The plan meticulously addresses all items and far exceed the criteria of Exhibit 28.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

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Exhibit 29 – Route Plans

Verification

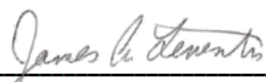
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

Route Plan Compliance

Pursuant to **538-x-7-.03-2.c.(8)(e)xiii.**, Secure Transport vehicles carrying cannabis or medical cannabis must always adhere to the designated route.

Inclusion in the Statewide Seed-to-Sale Tracking System

The Applicant's third-party inventory system will be integrated with METRC (the Statewide Seed-to-Sale Tracking System) and be used to track all cannabis and/or medical cannabis before and during the transport or transfer from the Applicant's facility. Pursuant to **538-x-7-.03-2.c.(8)(e)xv.**, route plans, manifests, transport logs, freight bills, bills of lading, and any free-on-board ("FOB") terms of sale documents, maintenance and repair records, and insurance documentation must be kept (either manually or electronically, including, but not limited to, as part of the Statewide Seed-to-Sale Tracking System), as to all vehicles in the secure transporter's fleet, for a period of not less than two (2) years, and long upon the request of the Commission or law enforcement. Such documents will be made available to the Commission or its representatives during inspections and other official visits.

Inclusion of the Applicant's route plan to the Statewide Seed-to-Sale Tracking System begins when the Applicant prepares to transport cannabis or medical cannabis. Every transfer of cannabis or medical cannabis from one licensed facility to another licensed facility must have a transport manifest associated with each transfer. Transport Manifests must contain: (1) The names of the driver, crewmember, and any other individuals onboard. (2) The name and address of the destination. (3) The weight and description of each individual package that is part of the shipment, and the total number of individual packages. (4) The date and time the medical cannabis shipment is placed into the transport vehicle. (5) The date and time the shipment is accepted at the delivery destination. (6) The identity of the employee having custody of the cannabis or medical cannabis, and the circumstances, duration, and

disposition of any other person who had custody or control of the shipment. (7) Any handling or storage instructions and identification number of each Transportation Agent transporting the cannabis and/or medical cannabis. The manifest must be signed by: An authorized employee of the facility from which the cannabis or medical cannabis is being transported; and the Secure Transporter's driver; and an authorized employee of the receiving facility. Manifests will be reviewed by the Transportation Director daily to ensure compliance to all procedures. These documents will be kept on record and will be made available to law enforcement upon request.

Route Plan Logistics

Daily transportation routes will be logically configured by the Transportation Director and communicated digitally in advance to the Transportation Agents via the efficient routing

software the Applicant has chosen to aid transportation associates. This software will allow Transportation Agents to see the day's deliveries mapped out in the exact order they should maintain and will be identical to the directions input into the state authorized tracking system and printed on the manifest. This clear communication and route efficiency technology will aid the Applicant in minimizing the risk of any route diversions. The Applicant will never transport any cannabis and/or medical cannabis out of the State of Alabama. The transportation of any cannabis and/or medical cannabis will cease before reaching the state line.

Actual Route Plans

The Applicant's secure transport processes will operate from the Integrated Facility located at Luverne, AL 36049. All route plans found below are based on secure transport drivers starting at the Integrated Facility. The route plans found below will be an example of the route plan that will be found on a transport manifest. If there are multiple stops on a secure transport driver's route, the route will continue from the driver's previous stop as shown in the *figure 4* below.

Figure 1

Figure 2

Figure 3

Figure 4

Figure 5

Figure 6

Alternative Route Plans Procedures

Alternative routes consist of any deviation to the route detailed in the transport manifest. There are many reasons why a route may need to be altered, but the most common include: (1) Road Closures; (2) Roadside Emergencies; (3) Traffic Delays; (4) Change in Delivery Location availability; and (5) Possible Security Threats. If an alternate route is necessary, the driver must contact the security office and note the change in the route plan.

By providing actual route plans, the Applicant has gone above and beyond the Commission requirements.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
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Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
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Within and Transportation Between Facilities			
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Exhibit 30 – Plan for Segregation of Processes Within and Transportation Between 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

30.1 Plan for Segregation of Processes Within and Transportation Between Facilities

The Applicant has designed the integrated facility and dispensary sites with a philosophy to: (1) segregate all aspects of production; (2) keep operations segregated; (3) reduce the risk of cross-contamination; and (4) prevent diversion.

30.2 Integrated Facility Design

The design of the integrated facility keeps the cultivation (outlined in red), processing (outlined in blue), secure transportation (outlined in orange), and support operations (outlined in magenta), not only isolated from one another, but isolated from other areas of the facility and areas that may bring in outside contaminants. See attached floor plan of Integrated Facility Showing Segregation of Processes (identified as “Floor plan of Integrated Facility Showing Segregation of Processes – Attachment to Exhibit 30, Section 30.2”).

What follows is a description of how the Applicant will keep strictly separated all aspects of production, including cultivation of cannabis, the processing of medical cannabis, the dispensing of medical cannabis, and the secure transport of cannabis and medical cannabis to and from its facilities. For a visual depiction, please see attached floor plan that display the segregated workflows for each aspect of production (identified as “Segregated Production Workflows at Integrated Facility – Attachment to Exhibit 30, Section 30.2”).

30.3 Segregation of Cultivation Processes

When agents arrive at the facility, they will be required to follow a specific flow through the facility to get to their work location. Access control devices and employee badges will keep agents segregated to the areas of the facility specific to their job duty.

30.4 Segregation of Processing Processes

30.5 Segregation of Internal QA/QC Product Testing Processes

30.6 Segregation of incoming medical cannabis that has been returned to the Applicants integrated facility from a processor or dispensary.

30.7 Segregation of Cannabis Waste & Medical Cannabis Waste Storage, Destruction, and Disposal Processes

30.8 Segregation of Transportation Processes

30.9 Segregation of Dispensing Process

30.9.1 Segregation for Dispensing Site Receiving Processes

30.9.2 Segregation for Dispensary Inventory Control Processes

30.9.3 Segregation for Dispensing of Medical Cannabis Processes

Conclusion | The Applicant has provided a plan for keeping strictly separated all aspects of production, including cultivation of cannabis, the processing of medical cannabis, the dispensing of medical cannabis, and the secure transport of cannabis and medical cannabis to and from its facilities. Meticulous attention to detail in segregation goes above and beyond Commission requirements. The Applicant has thoroughly documented and designed the integrated facility and dispensary sites with a philosophy to: (1) segregate all aspects of production; (2) keep operations segregated; (3) reduce the risk of cross-contamination; and (4) prevent diversion. By implementing proven segregation strategies and tactics honed in seventeen other states the Applicant currently operates in, products, patients, and employees remain safe.

Floor plan of Integrated Facility Showing Segregation of Processes – Attachment to Exhibit 30, Section 30.2

Segregated Production Workflows at Integrated Facility – Attachment to Exhibit 30.

Example of Segregated Workflows at a Dispensing Site – Attachment to Exhibit 30.

1. Declaration of Exempt Information

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Exhibit 31 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

31.1 The Facility Name and Type

Facility Name: Verano Integrated Facility

Type: Integrated Facility (Cultivation, Processing, and Transport)

31.2 The Physical Address and GPS coordinates of the Facility

Luverne, AL 36049

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Luverne, Alabama adopted an ordinance approving the operation of Medical Cannabis Integrated Facilities in said municipality. See attached copy of ordinance (identified as “City of Luverne, AL Ordinance Approving Integrated Facility Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the Mayor for the City of Luverne to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location if awarded a license from the AMCC (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Luverne, Alabama Cannabis Integrated Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

The Applicant’s operational timetable, outlined below, for the completion and commencement of cultivation operations within the Integrated Facility will comply with **§20-2A-62.(c)(3)** of the Act and demonstrates the ability of the Applicant to commence cultivation of cannabis within 60 days of application approval.

The building is structurally sound with existing electrical and plumbing infrastructure sufficient to meet the needs of the Integrated Facility. The overall footprint of the existing building

The Applicant has already secured the necessary cultivation, processing, HVAC, and security equipment to complete the Phase I construction buildout.

Within 60 calendar days of licensure, the Applicant will be ready for inspection by the Commission. When the Applicant is set to commence cultivation operations at the Integrated Facility, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant understands operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. The Applicant's extensive experience in completing compliant cannabis facility construction in multiple states helps them fully understand the rules and regulations so during inspection the Applicant expects that no critical or minor infractions (that would require reinspection by the Commission) will be documented during the pre-commencement inspection. The Applicant will be able to commence operations at the Luverne Integrated Facility immediately upon passing the pre-commencement inspection.

31.8 Public Access to Facility

The Luverne Integrated Facility will not be open to the public and visitors must have appointment. Appointments will only be available to visitors during normal business hours. The applicant anticipates normal business hours to be:

Monday – Friday 9:00 a.m. – 4:00 p.m. CT

31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Luverne Integrated Facility will be occupied by the applicant’s employees 24 hours per day, 365 days per year.

After Hours Management Contact

Additional Notes on Exhibit 31:

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 proposed five additional facilities for Dispensing.

*Professionally Rendered Floorplan – Luverne, Alabama Cannabis Integrated Facility
– Attachment to Exhibit 31, Section 31.6*



100'-0"

54'-0"

32'-0"

114'-0"

80'-0"

20'-0"









– Attachment to Exhibit 31, Section 31.4

*City of Luverne, AL Ordinance Approving Integrated Facility Operations
– Attachment to Exhibit 31, Section 31.5*

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5

ED BEASLEY
MAYOR

CITY OF LUVERNE
The Friendliest City in the South

MARGIE GOMILLION
CITY CLERK

P.O. Box 249
LUVERNE, ALABAMA 36049
Telephone (334) 335-3741
FAX (334) 335-2206

November 28, 2022

Alabama Medical Cannabis Commission
P. O. Box 3095
Montgomery, AL 36130

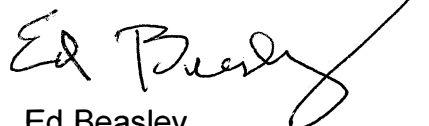
RE: Verano Alabama, LLC

Dear Sirs:

I am writing to advise that the City of Luverne is pleased to partner with Verano Alabama, LLC, a leading medical cannabis cultivator, to develop a medical cannabis production facility in the City of Luverne. Verano has a proven track record of successfully operating and maintaining compliance in one of the most regulated medical markets in the country. Verano has committed to supporting the community in several capacities, including support for the Crenshaw Community Hospital which is a major part of our community. We are very excited because we believe this project will result in a significant stimulus to the economy in the City of Luverne and in Crenshaw County.

The City of Luverne whole-heartedly supports Verano in their pursuit of a Medical Cannabis Integrated Facility license and believes Luverne is a strategic location for such a facility. We would strongly urge the Commission to award Verano a Medical Cannabis Integrated Facility license due to their demonstrated compliance in operating these types of facilities and the commitment to the communities where they are located. The City of Luverne stands ready to support Verano in the development of this project and looks forward to a long partnership that will benefit everyone concerned. Should you require any additional information, please feel free to contact me.

Sincerely,



Ed Beasley
Mayor

Exhibit 31 – Facilities

Verification

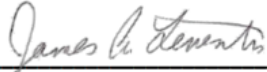
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

31.1 The Facility Name and Type

Facility Name: Zen Leaf Cannabis Dispensing Facility

Type: Dispensing Site

31.2 The Physical Address and GPS coordinates of the Facility

Montgomery, AL 36110

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Montgomery, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City of Montgomery, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the Land Use Control Administrator for the City of Montgomery to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Montgomery, Alabama Cannabis Dispensary Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

When the Applicant is set to commence operations at the dispensary, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant's operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Applicant passes the inspection it may commence operations; the Applicant acknowledges that having failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Applicant fails the third inspection, the Applicant is precluded from commencing operations and its license shall be revoked.

The applicant expects that it will be able to commence operations at the Montgomery Cannabis Dispensary Facility immediately upon passing the pre-commencement inspections with no critical or minor infractions requiring reinspection by the Commission.

31.8 Public Access to Facility

The Montgomery Cannabis Dispensary Facility will be open to the public.

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

Monday – Thursday	10:00 a.m. – 7:00 p.m. CT
Friday - Saturday	10:00 a.m. – 9:00 p.m. CT
Sunday	1:00 p.m. – 7:00 p.m. CT

31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Montgomery Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 31.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

Additional Notes on Exhibit 31:

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 proposed four additional facilities for Dispensing and one additional facility for integrated operations (cultivation, processing, and transport).

*Professionally Rendered Floorplan – Montgomery, Alabama Cannabis Dispensary Facility
– Attachment to Exhibit 31, Section 31.6*

CONFIDENTIAL NOT FOR CONSTRUCTION

– Attachment to Exhibit 31, Section 31.4



*City of Montgomery, AL Ordinance Approving Cannabis Dispensary Operations
– Attachment to Exhibit 31, Section 31.5*

ORDINANCE NO. 63-2021

**AUTHORIZING THE OPERATION OF A MEDICAL CANNABIS DISPENSARY
WITHIN THE CORPORATE LIMITS OF THE CITY OF MONTGOMERY**

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 a qualifying medical condition and a valid medical cannabis card; and

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

WHEREAS, the Act authorizes and requires the Medical Cannabis Commission to heavily regulates 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 Montgomery; and

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

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

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MONTGOMERY, ALABAMA, that it authorizes the operation of dispensing sites within the corporate limits of the City of Montgomery subject to any applicable zoning restrictions the City of Montgomery may adopt pursuant to §20-2A-51(c)(3).

ADOPTED this the 7th day of December, 2021.


STEVEN L. REED, MAYOR

ATTEST:


RENDA GALE BLALOCK, CITY CLERK

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5



Steven L. Reed
Mayor

City Council Members
 Charles W. Jarright President Audrey Graham
 Cornelius C. Calhoun Pres. Pro Tem Oronde K. Mitchell
 Ed Gimes Clay McInnis
 Brantley W. Lyons Glen O. Pruitt Jr.
 Marche Johnson

November 2, 2022

Dear Sir or Madam:

This is to advise you that the properties located at _____ is in a B-5 (Commercial) Zoning District, which will permit a medical cannabis dispensary.

The City is providing this information solely as a courtesy and the person requesting such information should independently confirm the information contained, herein. The City assumes no liability or responsibility for any misstatements or inaccuracies contained. If we can be of any further assistance, please do not hesitate to contact me at (334)625-2722.

Sincerely,

Thomas M. Tyson, Jr.
Land Use Control Administrator

/tri

Exhibit 31 – Facilities

Verification

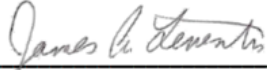
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

31.1 The Facility Name and Type

Facility Name: Zen Leaf Cannabis Dispensing Facility

Type: Dispensing Site

31.2 The Physical Address and GPS coordinates of the Facility

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Dothan, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City of Dothan, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the Planning Assistant for the City of Dothan to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Dothan, Alabama Cannabis Dispensary Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

When the Applicant is set to commence operations at the dispensary, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant's operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Applicant passes the inspection it may commence operations; the Applicant acknowledges that having failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Applicant fails the third inspection, the Applicant is precluded from commencing operations and its license shall be revoked.

The applicant expects that it will be able to commence operations at the Dothan Cannabis Dispensary Facility immediately upon passing the pre-commencement inspections with no critical or minor infractions requiring reinspection by the Commission.

31.8 Public Access to Facility

The Dothan Cannabis Dispensary Facility will be open to the public.

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

Monday – Thursday	10:00 a.m. – 7:00 p.m. CT
Friday - Saturday	10:00 a.m. – 9:00 p.m. CT
Sunday	1:00 p.m. – 7:00 p.m. CT

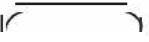
31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Dothan Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 31.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

Additional Notes on Exhibit 31:

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 proposed four additional facilities for Dispensing and one additional facility for integrated operations (cultivation, processing, and transport).



CONFIDENTIAL NOT FOR CONSTRUCTION



– Attachment to Exhibit 31, Section 31.4

City of Dothan, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5

ORDINANCE NO. 2022-290

AUTHORIZING THE OPERATION OF MEDICAL CANNABIS DISPENSING SITES

WHEREAS, in the 2021 Legislative Session, the State of Alabama Legislature passed Act No. 21-450 legalizing and creating a regulatory framework for medical cannabis; and,

WHEREAS, the Alabama Legislature made the following findings of fact:

1. "Medical research indicates that the administration of medical cannabis can successfully treat various medical conditions and alleviate the symptoms of various medical conditions."
2. "There are residents in Alabama suffering from a number of medical conditions whose symptoms could be alleviated by the administration of medical cannabis products if used in a controlled setting under supervision of a physician licensed in this state."
3. "Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments."

WHEREAS, this act requires the governing body of any municipality to authorize by ordinance the operation of the dispensing sites within the corporate limits of the municipality; and,

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

WHEREAS, the City of Dothan wishes to authorize the operation of medical cannabis dispensing sites within the corporate limits of the City of Dothan to assure its citizens can benefit from the medical and economic benefits of medical cannabis.

NOW, THEREFORE, BE IT ORDAINED by the Board of Commissioners of the City of Dothan, Alabama, as follows:

Section 1. In accordance with Alabama Code § 20-2A-51, a holder of a license granted by the State of Alabama pursuant to Act 21-450 is hereby authorized to operate a medical cannabis dispensing site within the corporate limits of the City of Dothan subject to the

Ord. No. 2022-290, authorizing the operation of medical cannabis dispensing sites, continued.

Section 2 That this ordinance and the rules, regulations, provisions, requirements, orders and matters established and adopted hereby shall take effect and be in full force and effect from and after the date of its final passage and adoption.

PASSED, ADOPTED, AND APPROVED ON SEPTEMBER 20, 2022.

ATTEST:

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Mayor

Associate Commissioner District 1

Associate Commissioner District 2

Associate Commissioner District 3

Associate Commissioner District 4

Associate Commissioner District 5

Associate Commissioner District 6
BOARD OF CITY COMMISSIONERS

I hereby certify that the above Ordinance was published in THE DOTHAN EAGLE, a newspaper of general circulation in the City of Dothan, Alabama, on September 23, 2022.

Wendy Shiver
City Clerk

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5



CITY OF DOTHAN

Department of Planning and Development

P. O. BOX 2128 · DOTHAN, ALABAMA 36302 · 334-615-4410 (o) · 334-615-4419 (f)
www.dothan.org

Todd L. McDonald, AICP – Director

December 14, 2022

To Whom It May Concern:

The Planning and Development Department is pleased to report that the subject property is zoned B-2 (Highway Commercial) according to the Official Zoning Map of the City of Dothan, Alabama. Under the B-2 zoning district, medical cannabis dispensaries are permitted by-right.

Preliminary review of the location referenced above indicates that there are no schools, day cares, or childcare facilities within 1,000 feet of this property. However, this is a requirement of state law and is not part of the city ordinance. It is your responsibility to verify that none of these uses exists with 1000 ft. of this property.

- The Property is not in a special, restrictive, or overlay district.
- The Property is not part of a PUD.
- Adjacent properties are zoned B-2.

Should you have any questions, please feel free to contact me. My direct telephone number is 334-615-4412 and my e-mail address is kvann@dothan.org.

Sincerely,

Kimberly Vann
Kimberly Vann
Planning Assistant

cc: File

Exhibit 31 – Facilities

Verification

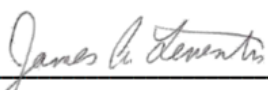
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

31.1 The Facility Name and Type

Facility Name: Zen Leaf Cannabis Dispensing Facility

Type: Dispensing Site

31.2 The Physical Address and GPS coordinates of the Facility

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Tuscaloosa, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City of Tuscaloosa, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the Planner for the City of Tuscaloosa to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Tuscaloosa, Alabama Cannabis Dispensary Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

When the Applicant is set to commence operations at the dispensary, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant's operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Applicant passes the inspection it may commence operations; the Applicant acknowledges that having failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Applicant fails the third inspection, the Applicant is precluded from commencing operations and its license shall be revoked.

The applicant expects that it will be able to commence operations at the Tuscaloosa Cannabis Dispensary Facility immediately upon passing the pre-commencement inspections with no critical or minor infractions requiring reinspection by the Commission.

31.8 Public Access to Facility

The Tuscaloosa Cannabis Dispensary Facility will be open to the public.

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

Monday – Thursday	10:00 a.m. – 7:00 p.m. CT
Friday - Saturday	10:00 a.m. – 9:00 p.m. CT
Sunday	1:00 p.m. – 7:00 p.m. CT

31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Tuscaloosa Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 31.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

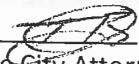
Additional Notes on Exhibit 31:

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 proposed four additional facilities for Dispensing and one additional facility for integrated operations (cultivation, processing, and transport).

– Attachment to Exhibit 31, Section 31.4

*City of Tuscaloosa, AL Ordinance Approving Cannabis Dispensary Operations
– Attachment to Exhibit 31, Section 31.5*

APPROVED AS TO FORM _____


Office of the City Attorney

Prepared By: SBH/cr

Requested: Admin Committee Date: 8/16/22

Council Presentation on: 8/23/22

Suspension of Rules: No

ORDINANCE NO. 9259

AN ORDINANCE AUTHORIZING THE OPERATION OF
MEDICAL CANNABIS DISPENSING SITES
(A22-0798)

WHEREAS, in 2021 legislative session the Alabama legislator passed Act No. 21-450 legalizing and creating a regulatory framework for medical cannabis and,

WHEREAS, the Alabama legislator made a number of findings of fact including:

“Medical research indicates that the administration of medical cannabis can successfully treat various medical conditions and alleviate the symptoms of various medical conditions.”

“There are residents in Alabama suffering from a number of medical conditions whose symptoms could be alleviated by the administration of medical cannabis products if used in a controlled setting under supervision of a physician licensed in this state.”

“Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments,”; and

WHEREAS, this act requires the governing body of any municipality by ordinance to authorize the operation of the dispensing sites within the corporate limits of the municipality; and

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

WHEREAS, the City of Tuscaloosa wishes to authorize the operation of medical cannabis dispensing sites within the corporate limits of the City of Tuscaloosa to assure its citizens can benefit from the medical and economic benefits of medical cannabis.

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF TUSCALOOSA that, in

Alabama pursuant to Act 21-450 is hereby authorized to operate a medical cannabis dispensing site within the corporate limits of the City of Tuscaloosa subject to the provisions of Act 21-450 and any relevant provisions of the code of the City of Tuscaloosa.

NOW, THEREFORE, BE IT FURTHER ORDAINED, any business license or sales tax revenue generated by medical cannabis dispensaries authorized by this ordinance shall be deposited to the public safety fund. The funds collected shall not be comingled with other funds of the city.

FUNDING REQUIRED: Over [gjNo

COUNCIL ACTION

Resolution _____ -
Ordinance _____ -
Introduced _____ -
Passed _____ -
2nd Reading _____ -
Unanimous _____ -
Failed _____ -
Tabled _____ -
Amended _____ -
Comments: _____ -

By: _____
Chief Financial Officer

AApteJ B/3D/J-9'

(1" f / ti)

(C1) NO)

[Handwritten Signature]
City Clerk

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8/J.3/!JD}if

IAfli :(/f+-' } ,[-ND)

unanimous: FAILED

[Handwritten Signature]
City Clerk

STATE OF ALABAMA)
TUSCALOOSA COUNTY)

I, Brandy P. Johnson, City Clerk of the City of Tuscaloosa, Alabama, hereby certify that the attached is a full, true, and correct copy of Ordinance No. 9259 duly adopted by the City Council of Tuscaloosa at a regular meeting of said Council held on the 30th day of August, 2022, as the same appears and remains of record in the record book in the Office of City Clerk wherein are recorded the Minutes of Proceedings of said Council.

IN WITNESS WHEREOF, I have hereunto affixed my signature and the official seal of said City of Tuscaloosa this the 31st day of August, 2022.




Brandy P. Johnson, City Clerk

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5



December 19th, 2022

To Whom It May Concern:

This letter is to verify the above referenced property is located within the corporate limits of the City of Tuscaloosa and is currently zoned MX-3.

Section 24-304 of the Tuscaloosa City Code outlines permitted uses for property zoned MX-3. Retail sales or service is listed as a permitted use for property zoned MX-3. Medical cannabis dispensing sites are considered retail sales or service.

Any and all state or federal guidelines and regulations related to medical cannabis dispensing will have to be followed, and the City of Tuscaloosa does not have any additional zoning restrictions for this use at this time.

Should you have any questions, please do not hesitate to contact the Planning Division of the Office of Urban Development at 205-248-5100.

Sincerely,

A handwritten signature in black ink that reads 'Jonathan Bowen'.

Jonathan Bowen
Planner



PLANNING

2201 University Blvd. • Tuscaloosa, AL 35401 • Phone 205-248-5110 • Fax 205-349-0136 • City Hall 205-248-5311

Exhibit 31 – Facilities

Verification

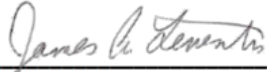
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

31.1 The Facility Name and Type

Facility Name: Zen Leaf Cannabis Dispensing Facility

Type: Dispensing Site

31.2 The Physical Address and GPS coordinates of the Facility

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Decatur, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City of Decatur, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the City Clerk for the City of Decatur to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Decatur, Alabama Cannabis Dispensary Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

When the Applicant is set to commence operations at the dispensary, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant’s operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Applicant passes the inspection it may commence operations; the Applicant acknowledges that having failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Applicant fails the third inspection, the Applicant is precluded from commencing operations and its license shall be revoked.

The applicant expects that it will be able to commence operations at the Decatur Cannabis Dispensary Facility immediately upon passing the pre-commencement inspections with no critical or minor infractions requiring reinspection by the Commission.

31.8 Public Access to Facility

The Decatur Cannabis Dispensary Facility will be open to the public.

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

Monday – Thursday	10:00 a.m. – 7:00 p.m. CT
Friday - Saturday	10:00 a.m. – 9:00 p.m. CT
Sunday	1:00 p.m. – 7:00 p.m. CT

31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Decatur Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 31.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

Additional Notes on Exhibit 31:

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 proposed four additional facilities for Dispensing and one additional facility for integrated operations (cultivation, processing, and transport).

*Professionally Rendered Floorplan – Decatur, Alabama Cannabis Dispensary Facility
– Attachment to Exhibit 31, Section 31.6*

CONFIDENTIAL NOT FOR CONSTRUCTION

– Attachment to Exhibit 31, Section 31.4

*City of Decatur, AL Ordinance Approving Cannabis Dispensary Operations
– Attachment to Exhibit 31, Section 31.5*

ORDINANCE NO. 22-4544A

WHEREAS, during the 2021 Regular Session of the Alabama Legislature, **Act 2021-450**, known as the *Darren Wesley 'Ato' Hall Compassion Act*, (the "Act"), was enacted and codified in Title 20, Chapter 2A, *Code of Alabama* 1975, "to create within Alabama a wholly intrastate system for the cultivation, processing, and distribution of medical cannabis in the interest of protecting its own residents from the danger that recreational cannabis poses" (Code of Ala. 1975 § 20-2A-2); and

WHEREAS, the Act legalizes and establishes a comprehensive regulatory framework for medical cannabis, including the licensing and strict regulation of the cultivation, processing, transporting, testing, and dispensing of medical cannabis; and

WHEREAS, the Act specifically finds as follows: "Establishing a program providing for the administration of cannabis derivatives for medical use in this state will not only benefit patients by providing relief to pain and other debilitating symptoms, but also provide opportunities for patients with these debilitating conditions to function and have a better quality of life and provide employment and business opportunities for farmers and other residents of this state and revenue to state and local governments." (Code of Ala. 1975 § 20-2A-2); and

WHEREAS, the Act defines a "dispensary" as an entity licensed by the Alabama Medical Cannabis Commission that is "authorized to dispense and sell medical cannabis at dispensing sites to registered qualified patients and registered caregivers" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act defines an "integrated facility" as an entity licensed "to perform the functions of a cultivator, processor, secure transporter, and dispensary" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act defines a "dispensing site" as a site that is "operated by a dispensary licensee or an integrated facility licensee" (Code of Ala. 1975 § 20-2A-3); and

WHEREAS, the Act prohibits a dispensary and an integrated facility from operating a dispensing site within a municipality unless the governing body of that municipality has adopted an ordinance authorizing the operation of dispensing sites within its boundaries (Code of Ala. 1975 §§ 20-2A-51, 20-2A-64, and 20-2A-67); and

WHEREAS, the Act "does not prohibit a municipality from adopting zoning ordinances restricting the operation of dispensing sites within its corporate limits" (Code of Ala. 1975 § 20-2A-51); and

WHEREAS, in accordance with the authority conferred on municipalities under the Act and in order to protect and promote the public health, safety and general welfare, the City Council of the City of Decatur Alabama desires to authorize the operation of dispensing sites for state licensed dispensaries and integrated facilities within the corporate limits of the City of

NOW, THEREFORE, BE IT ORDAINED by the City Council of the City of Decatur, Alabama as follows:

1. That, the City Council of the City of Decatur authorizes the operation of medical cannabis dispensing sites by dispensary licensees and integrated facility licensees within the corporate limits of the City of Decatur, subject to the provisions of **Act 21- 450** duly enacted by the Alabama Legislature, the rules and regulations promulgated thereunder, and applicable city laws, resolutions, and ordinances, as such may be amended at any time and from time to time; and
2. That the City Clerk-Treasurer of the City of Decatur or her designee is hereby directed to forward a copy of this Ordinance to the Alabama Medical Cannabis Commission not more than seven calendar days after its adoption; and
3. That each and every provision of this Ordinance is hereby declared to be severable so that if any provision is declared unconstitutional or invalid by a valid judgment of a court of competent jurisdiction, such judgment shall not affect the validity of any other provision, for the City Council declares that it is its intent that it would have enacted this Ordinance without such invalid or unconstitutional provision(s); and
4. That no medical cannabis dispensing site shall be located closer than one thousand feet from the boundaries of any church, school, day care, or child care facility; and
5. That no medical cannabis dispensing site shall be located closer than five hundred feet from the boundaries of any residential zoning district except for the R-4 (Multi-Family) residential zoning district; and
6. That no medical cannabis dispensing site shall be located within the boundaries of any R-4 (Multi-Family) residential zoning district.
7. That this Ordinance shall become effective upon its adoption and publication as provided by law.

ADOPTED this the 6th day of December, 2022.

APPROVED this the 7th day of December, 2022.



 Mayor

ATTEST:

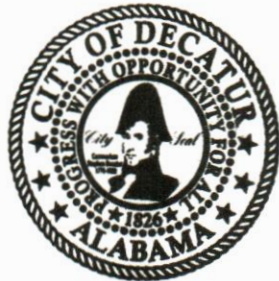


CERTIFICATE

STATE OF ALABAMA)	
)	CITY OF DECATUR
COUNTIES OF MORGAN AND LIMESTONE)	

I, Stephanie Simon, City Clerk of the City of Decatur, Alabama, hereby certify that the attached is a true and correct copy of Resolution No. 22-377 adopted by the City Council of the City of Decatur, Alabama at a regular meeting held thereof on the 27th day of December, 2022 as the same appears in the records on file in the Office of the City Clerk.

WITNESS my signature as City Clerk under the seal of the City of Decatur, Alabama, this 27th day of December, 2022.



Stephanie Simon

 Stephanie Simon
 City Clerk

RESOLUTION NO. 22-377

The City Council further finds and determines that city staff has reviewed the request and that the location requested meets the City's Zoning Ordinance and the adopted Medical Cannabis Ordinance;

THEREFORE, BE IT RESOLVED by the City Council of the City of Decatur, Alabama that the Verano Alabama, LLC request regarding a medical cannabis dispensing site to be located at [redacted] is hereby approved; subject to approval by the Alabama Medical Cannabis Commission and compliance with its regulations along with the City's requirements.

ADOPTED this 27th day of December 2022.

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5



A Grand City on a CHARMING SCALE

Planning Department

December 22, 2022

To Whom It May Concern:

Zoning Verification Letters provide information about and verify the current zoning of a particular piece of property and the types of uses that are allowed in that zoning district.

The purpose of this letter is to confirm that the current zoning of a site located at meets the criteria of the medical cannabis ordinance.

This location is considered approved by the Planning Department.

Regards,

Lee Terry
Planner III
Planning Department

Exhibit 31 – Facilities

Verification

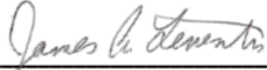
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

31.1 The Facility Name and Type

Facility Name: Zen Leaf Cannabis Dispensing Facility

Type: Dispensing Site

31.2 The Physical Address and GPS coordinates of the Facility

31.3 An aerial photograph of the facility, including site boundaries

31.4 Proof of authorization for the Applicant to occupy the property

31.5 Proof of Local Zoning

The City of Birmingham, Alabama adopted an ordinance approving the operation of cannabis dispensary operations in said municipality. See attached copy of ordinance (identified as “City of Birmingham, AL Ordinance Approving Cannabis Dispensary Operations – Attachment to Exhibit 31, Section 31.5”). The applicant has included a zoning verification letter from the Zoning Administrator for the City of Birmingham to demonstrate that the Applicant is permitted to operate the proposed facility at the proposed location (identified as “Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5”).

31.6 Professionally Rendered Floorplan

The professionally rendered floorplan for the facility identified in 31.1 above is attached hereto and identified as “Professionally Rendered Floorplan – Birmingham, Alabama Cannabis Dispensary Facility – Attachment to Exhibit 31, Section 31.6”).

31.7 A timetable for completion and commencement of operations as to the facility

When the Applicant is set to commence operations at the dispensary, the Applicant will contact the Commission to set a date for inspection under the procedures for an announced inspection set forth in Rule **538-x-4-.02 of Chapter 4**, except that the Pre-Commencement Inspection may be set at any mutually acceptable time. The Applicant’s operations may not commence at any facility until the facility has passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Applicant passes the inspection it may commence operations; the Applicant acknowledges that having failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Applicant fails the third inspection, the Applicant is precluded from commencing operations and its license shall be revoked.

The applicant expects that it will be able to commence operations at the Birmingham Cannabis Dispensary Facility immediately upon passing the pre-commencement inspections with no critical or minor infractions requiring reinspection by the Commission.

31.8 Public Access to Facility

The Birmingham Cannabis Dispensary Facility will be open to the public.

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

Monday – Thursday	10:00 a.m. – 7:00 p.m. CT
Friday - Saturday	10:00 a.m. – 9:00 p.m. CT
Sunday	1:00 p.m. – 7:00 p.m. CT

31.9 Facility Hours of Operation / After Hours Contact

The applicant anticipates that the Birmingham Cannabis Dispensary Facility will be occupied by the applicant’s employees during all public access hours (see 31.8 above) and approximately one (1) hour before and after the public access hours.

After Hours Management Contact

Additional Notes on Exhibit 31:

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 proposed four additional facilities for Dispensing and one additional facility for integrated operations (cultivation, processing, and transport).

CONFIDENTIAL NOT FOR CONSTRUCTION

– Attachment to Exhibit 31, Section 31.4

*City of Birmingham, AL Ordinance Approving Cannabis Dispensary Operations
– Attachment to Exhibit 31, Section 31.5*

No29pep16kds.O1

Submitted by Valerie Abbott, Chair, PLANNING AND ZONING COMMITTEE

Case No. ZAC2022-00016**ORDINANCE NO. 22-162****BE IT ORDAINED** by the Council of the City of Birmingham as follows:

SECTION 1. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 1: General Provisions and Definitions; Article II: Definitions; Section 1: Generally, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Article III. Definitions.

Section 1. Generally.

For the purpose of this Ordinance, certain terms and words are hereby defined. Any word used in this Ordinance not defined in this section will be defined by using “Webster’s II New College Dictionary”. Words used in the present tense shall include the future; the singular number shall include the plural and plural the singular; the word "building" shall include the word "structure" and the word "shall" is mandatory and not optional.

1. **Abutting.** Any property touching or sharing a common boundary. This term shall not be deemed to include parcels that are across a public street or right-of-way from each other.
2. **Accessory Structure.** Any subordinate structure that is incidental to the principal use of the premises and is located on the same lot as the related main use.
3. **Accessory Use.** Any use that is subordinate and incidental to the principal use of the premises.
4. **Adjacent.** Any property that is abutting or separated by a right-of-way.
5. **Adult.** A person 18 years of age or older.
6. **Adult Establishment.** Any "adult bookstore," “adult cabaret or dancing establishment,” "adult motion picture theater," or any commercial establishment which presents material or exhibitions distinguished or characterized by an emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas," as defined below for observation by patrons therein.

Specified anatomical areas.

- (1) Less than completely and opaquely covered human genitals, pubic region, buttock,

- and female breast below a point immediately above the top of the areola; and
- (2) Human male genitals in a discernible turgid state, even if completely and opaquely covered.

Specified sexual activities.

- (1) Human genitals in a state of sexual stimulation or arousal;
 - (2) Acts of human masturbation, sexual intercourse or sodomy; and
 - (3) Fondling or other erotic touching of human genitals pubic region, buttocks, or female breast.
- a. **Adult bookstore.** An establishment having, as a substantial portion of its stock in trade available for purchase or rental, books, magazines, and other periodicals, novelty items, cassette tapes, videotapes, DVDs or films which are distinguished or characterized by their emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas", as defined above, or an establishment with a segment or section devoted to the sale, rental or display of such material.
 - b. **Adult cabaret or dancing establishment.** A cabaret or dancing establishment which regularly features live performances that are characterized by the exposure of "specified sexual activities" or by "specified anatomical areas," as described above.
 - c. **Adult motion picture theater.** An enclosed building used for presenting material distinguished or characterized by an emphasis on matter depicting, describing or relating to "specified sexual activities" or "specified anatomical areas," as defined above, for observation by patrons therein.
 - d. **Adult Studio.** Any building or land used for the production of adult entertainment media, such as, video, webcams, webchat, or any other internet based adult entertainment that is used for the purpose of delivering adult entertainment to any audience via the internet or by any other means.
7. **Alabama Medical Cannabis Act or Medical Cannabis Act.** Alabama Act No. 2021-450, 2021 Regular Session of the Alabama Legislature, codified at Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and which may also be cited as “the Darren Wesley ‘Ato’ Hall Compassion Act”.
 8. **Alabama Medical Cannabis Commission or AMCC.** The state agency established by Ala. Code, 1975, § 20-2A-20, et seq., as now or hereafter amended, to regulate the medical cannabis industry in Alabama.
 9. **Alabama Medical Cannabis Commission Rules or AMCC Rules.** Administrative rules promulgated by the AMCC pursuant to the Medical Cannabis Act at Title 538 of the Alabama Administrative Code, as now or hereafter amended.
 10. **Alley.** A public right-of-way providing access to the back or side of a premises that has primary frontage on a street.
 11. **Amphitheater.** Any premises or outdoor structure specifically designed and used as a place of assembly for purpose of entertainment.

12. **Amusement (indoor).** The provision of entertainment or games of skill that is wholly enclosed in a building, such as bowling alleys, skating, billiards and pool halls, theaters, arcades, and similar types of amusement operations.
13. **Amusement (outdoor)** The provision of entertainment or games of skill where any portion of the activity takes place outside of a building, such as a stand-alone golf driving range, archery range, miniature golf course, or similar types of amusement operations. This use does not include a stadium, automotive or other types of racetracks, vehicular related activities or similar or related activities, or any uses listed within the Planned Recreational District (PRD) zoning district.
14. **Animal Boarding Facility.** Any building used for the temporary, indoor overnight boarding, care and grooming of domesticated dogs and cats.
15. **Animal Day Care.** Any building designated or arranged for the daytime care and grooming of domesticated dogs and cats. Does not include overnight boarding.
16. **Animal Kennel.** Any building(s), outdoor animal run or land designated or arranged for the care, breeding, boarding, training, or selling animals, primarily, but not limited to domesticated dogs and cats, whether by owners of such animals or by persons providing facilities and care, but shall not apply to the keeping of animals in a pet store, a laboratory for scientific or experimental purposes or in a veterinary establishment for the purpose of observation and/or recovery necessary to veterinary treatment.
17. **Apiary.** Any premises where bees are kept in hives or colonies for the production of honey.
18. **Appliance Repair.** Any building used for the repair of large appliances such as washing machine, refrigerator, and other similar items.
19. **Arena.** A large building with tiers of seats for spectators at sporting, entertainment or other recreational events.
20. **Automobile/Light Truck/Repair.** Any building used for the general repair or reconditioning of automobiles and engines, including but not limited to body, frame or fender straightening or repair, the reconditioning, repairing, sale, mounting, or installing of any tires, painting, or upholstery work, collision repair, vehicle steam cleaning, but excluding the assembly, disassembly, dismantling or salvage of automobiles, in whole or in part.
21. **Automobile Parking.** The use of property for parking or storage of operable automobiles and light trucks on a temporary basis. Such parking shall be for the use of licensed vehicles only and is not intended to include merchandise, vehicles for sale or vehicle repair.
22. **Automobile Sales.** A retail business which sells automobiles that is primarily housed in a structure and characterized by a mixture of secondary supporting uses; however, the principal

use of the site shall be the marketing and outside display of automobiles, whether by sale, rental, lease or other commercial or financial means. Secondary supporting uses may include on-site facilities for the repair and service of automobiles previously sold, rented, or leased by the dealership. No visibly disabled vehicles shall be stored on the premises.

23. **Automobile Service.** Any building used for the replacement of any part, or repair of any part, to an automobile that does not require removal of the engine head or pan, engine transmission or differential, including, but not limited to oil change and lubrication, cooling, electrical, fuel and exhaust systems, wheel alignment and balancing, brake adjustment, relining and repairs, mufflers, batteries, tire services and sales, shock absorbers, installation of stereo equipment, car alarms or cellular phones, dispensing of gasoline and motor fuels at retail , but excludes dismantling, rebuilding, reconditioning, or salvage of automobiles, in whole or in part.
24. **Bakery, Retail.** Any building used to produce and sell, to the general public, baked goods including but not limited to bread, pies, bagels, pastries, cakes and cupcakes. Retail bakeries may have seating areas for customers where retail items can be purchased and consumed.
25. **Bakery, Wholesale.** Any building used to produce and sell at wholesale, to retailers, baked goods including but not limited to bread, pies, bagels, pastries, cakes and cupcakes.
26. **Bar.** Any building where liquor, beer or wine or any combination are served for consumption on the premises, with or without food.
27. **Bed and Breakfast Inn.** A premises where overnight accommodations and a morning meal in a dwelling unit provided to transient guests for compensation.
28. **Bed and Breakfast Inn, Historic.** A premises where overnight accommodations and a morning meal in a dwelling unit provided to transient guests for compensation within an owner-occupied dwelling in a local historic district or other historically significant structure.
29. **Block-face.** All the properties abutting one side of a street and lying between the two nearest intersecting streets or between the nearest intersecting street and any railroad right-of-way, unimproved land, watercourse or City boundary.
30. **Brewery.** Any building used for the production of beer that manufactures more than 40,000 barrels per year, with a barrel containing 31 U.S. liquid gallons. A brewery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only the premises where manufactured.
31. **Brewery, Micro.** Any building used for the production of beer that manufactures less than 40,000 barrels per year, with a barrel containing 31 U.S. liquid gallons. A micro-brewery, actively and continuously engaged in the manufacture of alcoholic beverages on the

manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only the premises where manufactured.

32. **Brew Pub.** An establishment, meeting the qualifications of a brew pub under the State alcoholic beverage control laws in Title 28, Chapter 4A of the Code of Alabama 1975, as amended, where beer is actively and continuously manufactured or brewed, in a quantity not to exceed 10,000 barrels in any one year, for consumption on the premises or for sale to any designated wholesaler licensee for resale to retail licensees; and which contains a restaurant or otherwise provides food for consumption on the premises.
33. **Buffer.** An area located at the perimeter of the lot containing landscaping, berms, walls or fences that screen uses on adjacent properties from those uses occurring on the subject property.
34. **Building.** Any structure having a roof supported by columns and enclosed by walls designed or built for the support, enclosure, shelter, or protection of persons, animals, chattels, or property of any kind.
 - a. **Liner Building.** A building which is at least 24 feet deep, measured from the frontage façade, and masks a parking lot or parking structure from the frontage.
35. **Building Height.** The vertical distance from the grade level at the front façade to the highest point of the coping of a flat roof or to the deck line of a mansard roof, or to the average height between eaves and ridge for gable, hip and gambrel roofs.
36. **Bus Station.** A structure or building where City or intercity mass transit stops to pick up and drop off passengers. It is larger than a bus stop; bus station may include a terminal station for a number of routes, or a transfer station where the routes continue.
37. **Business Service.** The provision of services required for the day-to-day operation of a business such as, but not limited to, consulting service, photocopy or office supply.
38. **Business Service with Distribution.** The provision of business services that includes the warehousing and distribution of packages.
39. **Cannabis.** All parts of any plant of the genus cannabis, whether growing or not, including the seeds, extraction of any kind from any part of the plant, and every compound, derivative, mixture, product, or preparation of the plant; but excluding industrial hemp or hemp regulated under Ala. Code, 1975, § 2-8-11, as now or hereafter amended, and also excluding cannabis that is cultivated, processed, transported, stored, possessed, or used outside the Statewide Seed-to-Sale Tracking System (i.e., illicit cannabis), including but not limited to cannabis that once was included within and/or intended for placement on the Statewide Seed-to-Sale Tracking System (i.e., diverted cannabis).
40. **Car Wash, Automated.** A building or portion thereof containing facilities for washing

passenger vehicles, using production-line methods with a chain conveyor, blower, steam cleaning device or other mechanical devices within a partially enclosed structure.

41. **Car Wash, Manual.** A building or portion thereof containing facilities for washing passenger vehicles by manually operated high-pressure wands and operations that are done by hand such as auto detailing.
42. **Chicken Coop.** A building where domesticated hens are kept and the fenced area around the coop, called a run.
43. **Child.** A person under 18 years of age.
44. **Child/Adult Care.** The provision of care for individuals, who are not related to the primary caregiver, for less than 24 hours per day. These following classes are referenced:
 - a. **Accessory Child/Adult Care Center.** A facility or licensed agency that provides for the care of children or adults for periods of less than 24 hours a day and is accessory to primary use of the lot.
 - b. **Adult Care Center.** A building or structure wherein an agency, association, organization, person or group of persons, whether established for financial gain or otherwise, regularly provides care for three or more adults.
 - c. **Child Care Center.** A facility or licensed agency that provides for the care of thirteen or more children for periods of less than 24 hours a day.
 - d. **Department of Human Resources (DHR).** State of Alabama or Jefferson County Department of Human Resources.
 - e. **Family Day/Night Care Home.** A child care facility which is the family home in which the operator resides and which receives not more than six children and is licensed as a Family Day / Night Care Home by DHR.
 - f. **Family Group Day/Night Care Home.** A child care facility which is the family home in which the operator resides and which receives not more than twelve children, and is licensed as a Family Group Day / Night Care Home by DHR.
 - g. **Substitute/Alternate.** A person employed by an adult or child care provider on a part-time basis who is available to act as a care giver in the absence of the operator.
 - h. **Zoning Certificate of Operation.** A certificate of operation, issued by the Department authorizing the operation of a child or adult care facility within the City.
45. **Clinic.** A facility for examining and treating patients with medical, addictive, mental or physical problems on an outpatient basis, including ambulatory care or similar medical services that require a stay of less than 24 hours.
46. **Cold Frame.** An unheated outdoor structure with a glass or clear plastic top that protects seedlings and plants from the cold.
47. **College or University.** An institution of higher education offering undergraduate or

postgraduate degrees.

48. **Commercial Vehicle.** A commercial vehicle is any motor vehicle that has a capacity greater than one-ton or trailer over 14 feet such, but not limited to a truck, box truck, semi-truck, van, limousine, wrecker, coach or bus.
49. **Communal living facility.** Facilities in which four or more unrelated persons reside, including Assisted Living Facility, Boardinghouse, Nursing Home, Rehabilitation Facility, Sheltered Care Home, Transitional Home. Communal Living Facilities do not include child foster care facilities or facilities located in multi-family districts that are used for housing the mentally handicapped or mentally ill, where there are no more than 10 such people plus 2 unrelated persons to either the occupants of the facility or to each other. (Code of Alabama 11-52-75.1 and Board Case No. 84-95)
- a. **Assisted living facility.** Residencies for the frail elderly that provide rooms, meals, personal care, and supervision of self-administered medication. They may provide other services such as recreational activities, financial services and transportation.
 - b. **Boardinghouse.** A dwelling, or part thereof, in which for compensation lodging and meals are provided for four or more persons.
 - c. **Nursing home.** A home for the aged or infirm in which four or more persons not of the immediate family are received, kept or provided with food and shelter or care as part of convalescence, rehabilitation or hospice for compensation; but not including hospitals, clinics or similar establishments devoted primarily to the diagnosis and treatment of the sick or injured.
 - d. **Rehabilitation Facility.** A building used for the provision of treatment for addictive, mental or physical disabilities for 24 hours a day to four or more persons.
 - e. **Transitional home.** A facility in which four or more individuals live for a short period while receiving social psychological or similar therapy or counseling excluding jails, prisons, and other correctional institutions.
 - h. **Sheltered Care Home.** A dwelling for the sheltered care of persons with special needs, which, in addition to providing food and shelter, may also provide some combination of personal care, social or counseling services, and transportation.
50. **Community Garden.** A property used for cultivation and harvesting, for useful and productive purposes, food crops and/or ornamental crops for personal use, donation off-premise sale or on-premise sale in residential districts when a special exception is granted by the Board.
51. **Composting Facility (Solid Waste Treatment Facility).** A commercial or public solid waste processing facility where yard or garden waste, manure and other putrescible materials are transformed into soil or fertilizer by biological decomposition.
52. **Conditional Use.** A use or occupancy of a structure, or a use of land, permitted only upon review and approval of a site plan and subject to the limitations and conditions specified in Chapter 4, Article II of this Ordinance.

53. **Condominium.** The form of ownership of real or personal property or a combination thereof under a declaration providing for ownership of units of the property by one or more owners together with an undivided interest in common and limited common elements.
54. **Conservation Subdivision.** A residential development wherein a portion of the site is preserved as permanent undisturbed natural area, to continuously protect, environmental features. Conservation subdivisions are characterized by clustering of homes, reduced lot sizes, and provision of an undisturbed natural area to enable the preservation and maintenance of environmental features.
55. **Construction.** Is the development of physical improvements on a site such as, but not limited to, water and sewer lines, footings, and/or foundations. Clearing, grading, the storage of building materials or the placement of temporary structures on a site shall not constitute beginning construction.
56. **Contractor Yard.** The construction and incidental storage activities performed by construction contractors on lots other than construction sites.
57. **Convenience Store.** A retail establishment selling primarily food products household items, newspapers, and magazines, candy, and beverages and in which gasoline and other motor fuels, are dispensed at retail, by use of fixed approved dispensers. Convenience stores may include an automated car wash for washing one automobile at a time, within an enclosed building.
58. **Convention Center.** Any building designed and used to accommodate 1,000 or more persons and used for conventions, conferences, seminars, product displays, recreation activities, and entertainment functions, along with accessory functions including food and beverage preparation and service for on-premise consumption.
59. **Cottage Development.** A grouping of single-family dwellings clustered around a common area, in which not all lots front on a public street and is provided access by a shared driveway or alley.
60. **Country Club/Golf Course/Swim or Tennis Club.** A public or private establishment operated for the purpose of playing golf, swimming or playing tennis that may include an accessory office, retail pro shop, restaurant, banquet facilities, lounge, golf driving range, caretaker's dwelling unit, and golf/tennis academy.
61. **Dairy, Factory.** A building where raw milk is processed into milk, butter, yogurt, cheese or other dairy product.
62. **Dairy, Farm.** Any premises where milk is harvested from cows.
63. **Director.** The Director of the Department of Planning, Engineering and Permits of the City

of Birmingham, or his designee.

64. **Distillery.** Any building used for the production of liquor in quantities exceeding 1,000 barrels per month, with a barrel containing not more than 55 U.S. liquid gallons. A distillery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only one premises where manufactured.
65. **Distillery, Artisanal.** Any building used for the production of liquor in quantities not to exceed 1,000 barrels per month, with a barrel containing not more than 55 U.S. liquid gallons. An artisanal distillery, actively and continuously engaged in the manufacture of alcoholic beverages on the manufacturer's licensed premises, may conduct tastings or samplings on the licensed premises, and for that purpose give away or sell alcoholic beverages manufactured there for consumption on only one premises where manufactured.
66. **District.** A classification for which the zoning regulations governing the use of buildings and premises, the height and location of buildings, the size of yards, and the intensity of use are compatible.
67. **Donation Box.** A temporary accessory structure placed by a non-profit in a side or rear yard of certain commercial and industrial districts to collect clothing and other household items.
68. **Donation Center.** A facility located on the premises of a principal institutional use where donated items including clothing, furniture, house wares, small electrical appliances, household textiles, toys, and other small household items are collected.
69. **Dressmaker/Tailor/Millinery.** An establishment for producing clothing and hats for individuals at retail only.
70. **Drive-In/Drive-Through.** Any establishment where services are rendered or items are sold, for consumption on-site or off-site, and orders are made from a car to a server at a window, or via a speaker and receiver, or via an automated device.
71. **Driving Range, Free-Standing.** A facility equipped with distance markers, clubs, balls, and tees for practicing golf drives and putting, and which may include a snack-bar and pro-shop, but excludes miniature golf courses and "putt-putt" courses.
72. **Dwelling, Accessory.** One or more rooms located within an accessory structure and forming a single habitable unit with facilities which are used or intended to be used for living, sleeping, cooking and eating purposes that supports only one family. Accessory dwellings are subject to conditions listed in Chapter 4, Article IV, Section 2, Item B.
73. **Dwelling, Caretaker.** A residence, incidental to a principal use, for an on-site manager, security guard or caretaker employed on the premises.

74. **Dwelling, Single-Family Detached.** A building containing one dwelling unit and that is not connected to any other dwelling or principal building and designed for or occupied exclusively by one family.
75. **Dwelling, Townhouse.** A building on its own recorded lot connected to another primary structure occupied exclusively by one family that is attached by common walls to a like building. See Chapter 4, Article II, Section 2.
76. **Dwelling, Duplex, Triplex, Quadplex.** A building divided horizontally or vertically containing two, three or four dwelling units respectively on one lot where each unit independently supports one family.
77. **Dwelling, Multiple-Family.** A building containing five or more dwelling units.
78. **Dwelling Unit, Other.** One or more rooms located within a building and forming a single habitable unit with facilities which are used or intended to be used for living, sleeping, cooking and eating purposes that supports only one family.
79. **Electronics Repair.** Any building used for the repair of small electronics such as personal computers, phones, and other small electronics.
80. **Event Center.** Any building where the primary use is staging of temporary events, and may be operated by a vendor for the purpose of renting space for private functions.
81. **Façade.** That portion of any exterior elevation on a building extending from grade to top of the parapet, wall, or eaves and the entire width of the building elevation.
82. **Family.** One or more persons occupying a dwelling and living as a single housekeeping unit, all of whom or all but two of whom are related to each other by birth, adoption or marriage as distinguished from a group occupying a communal living facility.
83. **Farmer’s Market.** Premises where outdoor sales sanctioned by the State of Alabama Farmer’s Market Authority, consisting of whole uncut produce, ornamental crops and value-added agricultural products such as baked goods, jams and jellies, pickles and relish, dried fruits, syrups and honey, eggs, meat, nuts and handmade art and crafts.
84. **Fence or Wall.** A structure, solid or otherwise, erected, placed, or constructed on a property, which is intended to be a barrier, boundary, enclosure, privacy feature, or decorative item. It is characteristic of such an item that it is normally a separate “stand-alone” structure, erected along the perimeter (or close to the perimeter) of a property.
85. **Financial Institution.** Any building, room, space or portion thereof where an establishment provides a variety of financial services, and are limited to, federally insured banks, credit

unions, and mortgage companies.

86. **Fitness Center.** A building and premises containing recreational facilities such as gymnasiums, swimming pools or playing fields that is available to the membership of a club.
87. **Flea Market.** Premises where outdoor sales consisting of individual stalls used for selling various types of merchandise such as used household items, and cut-rate goods.
88. **Fraternity/Sorority House.** Living quarters that may be used for gathering or entertaining for private social organizations serving students of colleges or universities and located on the campus as depicted on the approved master plan of the college or university.
89. **Frontage.** The area between a building frontage façade and a path, passage, waterbody, civic space, or the curb (or if there is no curb, the edge) of the vehicular lanes of a thoroughfare having vehicular lanes, inclusive of the built and planted components of such area. Frontage is divided into private frontage and public frontage.
90. **Frontage Façade.** A façade that is set along a frontage line.
91. **Frontage Façade Void Area.** The area of a frontage façade not comprised of walls; including windows, doors and other openings in the wall. Frontage façade
92. **Funeral Home.** A building designed for the purpose of furnishing funeral supplies and services to the public and includes facilities for the preparation of the human body for internment and/or cremation.
93. **Furniture Store.** A retail store where furniture is displayed, stored and offered for sale.
94. **Garage, private.** An accessory building or part of a principal building designed or used for the storage of motor-driven vehicles owned and used by the occupants of the building to which it is accessory.
95. **Garage Sale/Yard Sale.** A sale of personal property by homeowner or occupant of real property.
96. **Grade Level.** For buildings the average level of the finished ground surface at the front façade of a building. For signs, trees, landscaping and light fixtures, the level of finished ground surface at the base of the sign, tree, plant or fixture.
97. **Greenhouse/Hoophouse.** A temporary or permanent structure where plants are cultivated and that is typically made of, but not limited to, glass, plastic, piping, translucent plastic or fiberglass.
98. **Greenway.** An open space conservation area that provides passive recreational

opportunities, pedestrian and/or bicycle paths, and/or the conservation of open spaces or natural areas.

99. **Gross Floor area.** The gross horizontal areas of all floors, measured from the exterior faces of the exterior walls of a building, and any outdoor seating area or patio used by restaurants or bars.
100. **Heavy Equipment Sales and Service.** The retail or wholesale sale or rental of heavy motorized vehicles or equipment, along with service, repair or maintenance such as, but not limited to construction equipment rental yards, tractor-trailers, semi-trailers, buses, and farm equipment.
101. **Heliport.** Any premises used for landing helicopters for loading and unloading of occupants of the aircraft, excluding maintenance and fueling.
102. **Home Improvement Store.** The retail sale of a diverse range of hardware and related materials generally used in the maintenance, repair or construction of buildings or other structures, including lawn and garden supplies, and may include outside display of finished product or packaged materials.
103. **Home Occupation:** An activity carried out for financial gain by a resident, with an approved business license from the City, and conducted entirely within the resident's dwelling unit. Home occupations are accessory, incidental, and secondary to the use of the building for dwelling purposes and does not change the essential residential character or appearance of such building.
104. **Hospital.** Any institution, building or other premises established for the maintenance, observation, medical or dental care and supervision and skilled nursing care of persons suffering from sickness, disease or injury or for the convalescent or chronically ill persons.
105. **Hotel/Motel.** An establishment offering sleeping accommodations to guests. Hotels may include, as an integral part of operations, a restaurant, bar, conference rooms, banquet or ballrooms, gift shop, recreation facility and a caretaker dwelling.
106. **Internment, Cemetery.** Any land used for the interment of the dead which may include buildings for the purpose of preparing the dead for interment or cremation and structures such as mausoleums and columbariums.
107. **Internment, Columbarium.** A structure designed to store the ashes of human remains that have been cremated, in niches or cinerary urns.
108. **Internment, Mausoleum.** A building or other structure used as a place for the interment of the dead in sealed crypts or compartments.

109. **Junkyard, general.** A premises used for the outside storage or placement of used and/or damaged materials and items.
110. **Junkyard, vehicular.** A premises used for the outside placement, storage, parking, dismantling, or disassembling of any disabled or inoperable vehicles, or parts thereof, including, but not limited to motors, tires, wheels, axles, transmissions and other accessories.
111. **Landfill.** A method of compaction and earth cover of solid wastes that does not contain garbage or other putrescible wastes, including, but not limited to, tree limbs and stumps, demolition materials, incinerator residues, and like materials not constituting a health or nuisance hazard, such as hazardous waste or medical waste, where cover need not be applied on a per day used basis.
112. **Landfill, Sanitary.** A controlled area of land upon which non-hazardous and non-medical farm, residential, institutional, commercial or industrial solid waste is deposited and is covered with compacted earth each day as deposited, with no on-site burning of wastes, and so located, contoured, and drained that it will not constitute a source of water pollution as determined by the Alabama Department of Environmental Management (ADEM).
113. **Landscape Plan.** A document, prepared by an Architect, Landscape Architect or other design professional with special knowledge of landscaping standards, that depicts location, character and extent of landscaping, and shall include plant location, corresponding plant schedule, planting instructions, and must include a combination of shrubs, trees and ground cover.
114. **Laundry Plant.** Any building or structure in which articles of clothing and goods are subjected to the process of dry cleaning, and pressing of such articles.
115. **Legal Non-conforming use.** The use of any building or land which was lawful prior to the adoption or amendment of this Ordinance or does not conform to the amendments of this Ordinance or to the present requirements of the applicable district, or a use that has been granted resumption of legal non-conforming use by the Zoning Board of Adjustment (Board), but that is in compliance with Chapter 9, Article VII.
116. **Livestock Barn.** Any structure or premises used for the boarding, breeding and/or raising of domestic livestock (excluding swine, sheep and goat), whether by owners of such animals or by persons providing facilities and care.
117. **Lot.** A plot, unit, or other portion of land in a subdivision or plat of land, having its principal frontage on a street, except that cottage subdivisions may have a portion of the units face interior common area and up to 20 percent of lots in character districts may have frontage on a path or passage if such lots have legal and physical vehicular access to a vehicular thoroughfare via driveway or easement, separated from other such portions by description on a record of survey map, for the purpose of ownership, sale, occupancy, use, construction or development, separate from other lands.

118. **Lot, corner.** A lot abutting upon two or more streets at their intersection.
119. **Lot, through.** A lot other than a corner lot abutting two streets.
120. **Lot of record.** A lot recorded in the office of the probate judge in the county where it is located prior to the adoption of subdivision regulations. If a portion of a lot or parcel has been conveyed prior to adoption of subdivision regulations, the remaining portion of such lot shall also be considered a lot of record.
121. **Lot width.** The width of the lot at the front building setback line.
122. **Manufactured Home.** A pre-fabricated dwelling unit that must have a Federal Manufactured Home Construction and Safety Standards label, a HUD label of approval and manufactured date later than June 15, 1976, and an Alabama Manufactured Housing Commission insignia and date plate.
123. **Manufacturing, Heavy.** The manufacture or compounding process of raw materials. These activities or processes may necessitate the storage of large volumes of highly flammable, toxic matter or explosive materials needed for the manufacturing process, and may generate dust, odor, heat, glare and vibration. These activities may involve outdoor operations as part of their manufacturing process. Typical heavy manufacturing uses include but are not limited to: concrete batch plants; concrete, tile, or brick manufacturing; automobile, truck, and tire assembly; ammonia or chlorine manufacturing; metal casting or foundries; gas manufacturing; grain milling or processing; metal or metal ore production, refining, smelting, or alloying; petroleum or petroleum product refining; boat, pool and spa manufacturing; slaughtering of animals; glass manufacturing; paper manufacturing; manufacturing of raw materials into compost, and wood or lumber processing.
124. **Manufacturing, Light.** The manufacture, predominately from previously prepared materials, of finished products or parts, including processing, fabrication, assembly, treatment and packaging of such products, and incidental storage, sales and distribution of such products, but excluding basic industrial processing. These activities do not necessitate the storage of large volumes of highly flammable, toxic matter or explosive materials needed for the manufacturing process. Typical light manufacturing uses include but are not limited to: electronic goods; food and bakery products; non-alcoholic beverages; alcoholic beverages; dry cleaning plants; paper imprinting; household appliances; leather products; jewelry; food and bakery products; and clothing apparel.
125. **Manufacturing, Specialized.** Facilities engaged in the assembly, design, repair, or testing of: analyzing or scientific measuring instruments; semiconductor and related solid state devices, including but not limited to: clocks, integrated microcircuits, jewelry, medical, musical instruments, photographic or optical instruments, or timing instruments, and assembly of hand held finished products or any custom architectural or artisan industry,

characterized as light industry, that does not have an ADEM permit for pollution release or noise, odor, illumination, trucking, or other adverse impacts to surrounding uses.

126. **Market Manager.** Individual that is responsible for the operation of a Farmer's and/or Public Market.
127. **Medical Cannabis.** A medical grade product grown and processed within the State of Alabama, in one of the approved forms set forth in Ala. Code, 1975, § 20-2A-3(14), as now or hereafter amended, that contains a derivative of cannabis for medical use by a registered qualified patient pursuant to the Medical Cannabis Act and the AMCC Rules.
128. **Medical Cannabis Cultivator.** An entity licensed by the AMCC (or, as applicable, the Department of Agriculture and Industries) under Ala. Code, 1975, § 20-2A-62, as now or hereafter amended, authorized to grow cannabis pursuant to the Medical Cannabis Act, the AMCC Rules, and the rules of the Alabama Department of Agriculture and Industries at Title 80 of the Alabama Administrative Code, as now or hereafter amended.
129. **Medical Cannabis Dispensary.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, authorized to dispense and sell medical cannabis at dispensing sites to registered qualified patients and registered caregivers pursuant to the Medical Cannabis Act and the AMCC Rules.
130. **Medical Cannabis Integrated Facility.** An entity licensed under Ala. Code, 1975, § 20-2A-67, as now or hereafter amended, authorized to perform the functions of a cultivator, processor, secure transporter, and dispensary pursuant to the Medical Cannabis Act and the AMCC Rules.
131. **Medical Cannabis Processor.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-63, as now or hereafter amended, authorized to purchase cannabis from a cultivator and extract derivatives from the cannabis to produce a medical cannabis product or products for sale and transfer in packaged and labeled form back to the contracting cultivator, if applicable, or to a dispensary site or integrated facility where the packaged and labeled product may be offered for sale at a dispensary site to holders of a valid, unrevoked and unexpired Medical Cannabis Card, pursuant to the Medical Cannabis Act and the AMCC Rules.
132. **Medical Cannabis Secure Transporter.** An entity licensed by the AMCC under Ala. Code, 1975, § 20-2A-65, as now or hereafter amended, authorized to transport cannabis or medical cannabis from one licensed facility or site to another licensed facility or site pursuant to the Medical Cannabis Act and the AMCC Rules.
124. **Medical Cannabis State Testing Laboratory.** An entity licensed under Ala. Code, 1975, § 20-2A-66, as now or hereafter amended, authorized to test cannabis and medical cannabis to ensure the product meets safety qualifications and efficacy requirements pursuant to the Medical Cannabis Act and the AMCC Rules.

125. **Medical Lab.** A facility for analytic or diagnostic research or investigation of a medical nature on blood, tissue, or other human or animal components, but not for the production of a product.
126. **Mini-storage Warehouse.** A building or group of buildings containing separate, individual spaces available for lease or rent for storage purposes only.
127. **Mixed-Use Development.** Premises that integrates a combination of retail, office, residential, hotel, recreation or other function.
128. **Mobile Grocery Store.** A motorized vehicle, trailer, or other portable unit drawn by a motorized vehicle from which food items are sold or distributed. The mobile grocery store may not exceed 26 feet in length. No preparation or assembly of food items or beverages may take place from the unit. Food items may include fresh fruit, vegetables, meat, dairy, pantry staples, or small household items. A mobile grocery store shall not be allowed to operate in the City's right-of-way without authorization or permission from the City.
129. **Motor Freight, Distribution.** Facilities engaged in the shipment of goods from shippers to receivers for a charge including the services of other transportation establishments to effectuate delivery.
130. **Nursery.** Any premises used for the retail and wholesale sale of plants grown on or off site, as well as accessory items such as clay pots, potting soil, fertilizers, insecticides, hanging baskets, rakes and shovels, but not power equipment such as lawnmowers or tractors.
131. **Office.** A room or group of rooms where the principal use is conducting the affairs of a business, profession, service, industry or government and generally furnished with desks, tables, files and communication equipment.
132. **Office, Institutional.** Any building used as an office for charitable non-profit organizations that may hold meetings on a regular basis, and charity events on a temporary basis.
133. **Office, Leasing/Sales.** The use of a unit or dwelling as a leasing and or sales office for other units solely within that development.
134. **Office Warehouse.** Any building used for the combined uses of office and warehouse, where the office function is the principal use (at least 60% of the gross floor area) of the building, for the primary purpose of wholesale trade, display, and distribution of products.
135. **Off-Premise Sign.** Any permanent or temporary sign which directs the attention of the general public to a business, service, product or activity not conducted, offered or sold as a major portion of business upon the premises where such sign is located.
136. **Open Space.** Land not covered by man-made impermeable surfaces, parking or buildings,

other than recreational structures, pools, or stormwater facilities, which may be landscaped or preserved in a natural state for private use of owners or guests, or for public access as may be required by the provisions of these regulations or the zoning ordinance.

137. **Opioid.** An opioid is a class of addictive narcotic drugs that are often prescribed for severe pain relief but also are frequently used (and abused) illegally to create euphoric states of consciousness. Common types of opioids are heroin, codeine, and morphine.
138. **Opioid Replacement Therapy Treatment Facility.** Any operation that has received a Certificate of Need from the State Health Planning and Development Agency of Alabama to operate a facility to prescribe and/or dispense opioid replacement drugs and offer therapy to individuals and groups as a part of a treatment program. These opioid replacement drugs generally include, but not limited to, methadone, naloxone, naltrexone, and similar types of opioid receptor agonists.
139. **Public Market.** Premises where outdoor sales consisting of whole uncut produce, ornamental crops, value-added agricultural products such as baked goods, jams and jellies, pickles and relish, dried fruits, syrups and honey, eggs, meat, nuts, handmade art and crafts and unique local goods. Sales of used clothing, mass produced items and appliances are prohibited.
140. **Park.** Any facility or property specifically designated as a park, natural area or recreation area that is used for recreational uses or predominately kept in a natural state.
141. **Pawnshop.** Any building or portion thereof where a pawnbroker is engaged in lending money on the security of pledged goods left in pawn, or in the business of purchasing personal property to be left in pawn on the condition it may be redeemed by the seller for a fixed price within a fixed period of time, as regulated by Title 5, Chapter 19A of the Code of Alabama.
142. **Payday Loan (Deferred Presentment) Business.** A business that, in accordance to the requirements and restrictions listed in Chapter 18A of Title 5 of the Code of Alabama (Alabama Deferred Presentment Services Act), involves a transaction pursuant to a written agreement involving the following combination of activities in exchange for a fee: (1) accepting a check or authorization to debit a checking account and, in connection with that acceptance, advancing funds to the checking account holder; and (2) holding the check or authorization to debit the checking account for a specified period of time.
143. **Personal Care Services.** Services such as, spas, tanning salons, beauty and barber care, and dry cleaning and laundry services not to include a laundry plant.
144. **Personal Instruction.** Services for training individuals or groups in the arts, dance, personal defense, crafts or other subjects of a similar nature.
145. **Place of Worship.** Any structure or site used primarily for religious practices.

146. **Power Plant.** Any structure or land used for the generation of electrical power.
147. **Premises.** A lot, parcel or acreage parcel together with all buildings and structures existing thereon.
148. **Principal Building.** A building that contains the principal use located on a premises.
149. **Principal Frontage.** With respect to corner lots, the private frontage designated to bear the address and principal entrance to the building, and the measure of minimum lot width. For corner lots, prescriptions for the location of parking in certain lot layers pertain only to the principal frontage and prescriptions for the first lot layer pertain to both frontages of a corner lot. With respect to non-corner lots, principal frontage is synonymous with frontage.
150. **Principal Use.** The main use located in a building or on a premises.
151. **Printing and Publishing.** The production and distribution of books, magazines, newspapers and other printed matter, including record pressing and publishing, and engraving.
152. **Private Club.** A building or portion thereof or premises owned or operated by a corporation, association, person or persons for a social, educational, or recreational purpose, but not primarily for profit or to render a service which is customarily carried on as a business.
153. **Public building.** Any building that is accessible to the public and its operation is funded from public sources.
154. **Racetrack.** Any premises or building that includes a measured course where animals or machines are entered in competition against one another or against time, including tracks that are used for drifting.
155. **Railroad Station.** A building or structure where railroad cars stop to load and un-load passengers.
156. **Railroad Yard.** The use of land, building or structure for activities directly associated with the operation of a railroad such activities may include loading and off-loading of freight, and maintenance and repair of railroad cars.
157. **Recreation Equipment Sales and Service.** The retail or wholesale sale of motorcycles, trucks and vans, recreational vehicles, boats, or similar motorized recreational equipment, along with incidental service or maintenance such as, but not limited to boat dealers, motorcycle dealers, and recreational vehicle dealers.
158. **Recycling (Recovered Materials) Collection Center.** A drop-off facility that is staffed and fenced for the temporary assemblage of small, recovered materials or recyclable consumer items, such as food and beverage containers, fabrics and paper, that has waste receptacles on

site that are open to the public.

159. **Recycling Facility (Solid Waste Treatment Facility).** A facility, other than a facility open to the public to receive household waste and recyclable material, where any method, technique, or process is utilized to separate, process, modify, convert, treat or otherwise prepare non-putrescible waste so that component materials or substances may be used or reused or sold to third parties for such purposes.
160. **Resource Extraction.** The extraction of minerals or materials, including rock crushing, screening and the accessory storage of explosives.
161. **Restaurant.** Any establishment where food is prepared and sold for consumption on-site or as take-out.
162. **Retail.** An establishment engaged in the selling or renting of goods or merchandise (usually to the general public for personal use or household consumption, although they may also serve business and institutional clients) and in rendering services incidental to the sale of such goods.
163. **Rummage Sale.** A sale of personal property or other merchandise for the express purpose of raising charitable donations for the benefit of the entity holding the sale_by a place of worship, charitable, or civic organization.
164. **Salvage Yard.** Any land or building used for the storage of recovered materials for the purpose of recycling, reuse, or proper storage for future recycling or reuse.
165. **School, Business.** An enterprise offering instruction and training in a service or the arts such as secretarial, cosmetology, commercial artist, computer software, legal, and similar training, provided that such enterprise does not offer student housing or athletic facilities at the site.
166. **School, Elementary/Middle.** Any building used for public primary instruction or a parochial or private school having a curriculum including the same courses ordinarily given in a public school that may include accessory structures such as a gymnasium.
167. **School, High.** Any building used for public secondary instruction or a parochial or private school having a curriculum including the same courses ordinarily given in a public school that may include accessory structures such as a gymnasium or stadium.
168. **School, Trade.** Any building used for the offering of regularly scheduled instruction in technical, commercial or industrial trade skills.
169. **Scientific Lab.** A facility primarily engaged in performing physical, chemical, and other analytical testing services or investigation and experimentation of a scientific nature and other scientific research, but not for the production of a product.

170. **Scrap Metal Processor.** Any building or land used for the storage, purchase or sale of scrap metal which may include the grading, cutting, preparing, processing or refining of scrap metal for sale and shipment to industrial consumers.
171. **Shopping Center.** A group of commercial-retail establishments planned, developed, owned or managed as a unit with off-street parking provided on the property. Any out-parcel within a shopping center shall be developed under a separate site plan.
172. **Sign.** A sign is any object or device or part thereof situated outdoors or indoors which is used to advertise or identify a person, institution, organization, business, product, service, event or location by any means including words, letters, figures, designs, symbols, fixtures, colors, illumination or projected images. Signs do not include merchandise, pictures or models of products or services incorporated in a window display.
173. **Solar Panel, Building Mounted.** A solar energy collection device mounted to a structure.
174. **Solar Panel, Ground Mounted.** A solar energy collection device mounted to the ground.
175. **Solid Waste Transfer Facility.** Any building used to receive and temporarily store solid waste prior to being delivered to a sanitary landfill or other solid waste facility.
176. **Special Exception.** An action where permission is granted to establish that a use be allowed within a district after the Board determines that the use as proposed would not disturb public health, safety, welfare, comfort, convenience, appearance, prosperity or general welfare.
177. **Stable.** Any lot, building, structure or premises used for the boarding, breeding, training, and/or raising of horses, whether by owners of such animals or by persons providing facilities and care.
178. **Stadium.** A large open space with tiers of seating for spectators surrounding a field used for sporting, entertainment or recreational events.
179. **Story.** That portion of a building other than a cellar, included between the surface of any floor and the surface of the floor next above it, or, if there be no floor above it, then the space between the floor and the ceiling next above it.
180. **Street.** A public right-of-way for movement of motor vehicles, pedestrians or non-motorized traffic, whether identified as a street, highway, thoroughfare, parkway, throughway, road, avenue, boulevard, lane, place, or however designated.
181. **Street Line.** A dividing line between a lot, tract or parcel of land and an abutting street.
182. **Street Setback.** The distance a building or structure shall be setback from a front, side or rear lot line. Street setback may be referred to as a front, side or rear setback or front, side or

rear yard.

183. **Structure.** Anything constructed or erected, the use of which requires a location on the ground or attached to something having a location on the ground, including but not limited to buildings, signs, billboards, back stops for tennis courts, fences or radio towers.
184. **Structural Alterations.** Any change in the supporting members of a building or structure, such as bearing walls, columns, beams or girders; provided, however, that the application of any exterior modernizing shall not be considered a structural alteration.
185. **Studio, Radio/TV.** A facility for the staging and recording of video or audio productions such as, but not limited to, music commercials, programs, and motion pictures. Any broadcasting antennas or satellites are subject to the regulations of Chapter 4, Article V of this Ordinance.
186. **Subdivision Committee.** A committee composed of five (5) members of the Commission authorized to hear and decide upon applications for subdivisions of land, and to advise the chief legislative body of the City on vacation of public lands and new right-of-way dedications, all such actions to be taken on behalf of the Commission.
187. **Tank Farm.** Any land or structure used for the storage of one or more aboveground large containers for the bulk storage of material in liquid, powder or pellet form. Items stored at these facilities are intended to be wholesaled to retailers, and no retailing of stored items can occur on site.
188. **Timbering.** Any premises used for the harvesting of timber.
189. **Title Loan Business.** Any business that offers a short term loan that is collateralized by the title of a vehicle in accordance with the requirements and restrictions described and detailed in Chapter 19A of Title 5 of the Code of Alabama (Alabama Pawn Shop Act).
190. **Truck Plaza.** Any building premises or land in which or upon which a business may engage in the service, maintenance or storage of commercial vehicles including dispensing of motor fuel or petroleum products directly into motor vehicles. A truck plaza also may include overnight accommodation, restaurant and truck wash facilities.
191. **Truck Repair, Heavy.** Any building or land used for the general repair or reconditioning of heavy trucks and equipment and engines, including but not limited to body, frame or fender straightening or repair, the reconditioning, repairing, sale, mounting, or installing of any used tires, painting, or upholstery work, collision repair, vehicle steam cleaning, but excluding the assembly, disassembly, dismantling or salvage of any vehicle, in whole or in part. No abandoned or inoperable vehicles shall be stored on the premises.
192. **Upholstery Shop.** Any building used for the minor repair of furniture and replacement of upholstery to household and office furnishings but does not include motor vehicle

upholstering or repair.

193. **Urban Farm, Outdoor.** An outdoor commercial farm that produces and distributes food crops, ornamental crops and other agriculture products, such as honey, either for sale on site or off site utilizing traditional farming methods, hydroponics or aquaculture.
194. **Urban Farm, Indoor.** An enclosed commercial farm that produces and distributes food crops, ornamental crops and other agriculture products for sale on site or off site utilizing hydroponics or aquaculture, and is completely enclosed within a building. Outside storage is prohibited.
195. **Utility Substation.** A facility that regulates electric current, telephone switching or natural gas pressure for distribution to individual neighborhoods.
196. **Variance.** A departure from any provision of this Ordinance for a specific parcel, except use, without changing the zoning ordinance or the underlying zoning of the parcel. A variance is intended to be granted on rare occasions, when demonstration of unnecessary hardship based on the review standards set forth in Chapter 9, Article VI in relation to other properties in the same zoning district.
197. **Veterinarian Clinic.** An enterprise for the medical treatment of animals and for the temporary, indoor overnight boarding, care, grooming and convalescence of domesticated dogs and cats.
198. **Warehouse.** A facility used primarily for the bulk storage of goods and materials or motor vehicles, characterized by heavy trucking activity, but not involved in manufacturing or production.
199. **Wholesale.** The sale or distribution of goods from the premises that may consist of the flexible use of the floor area for warehouse, assembly, showroom and office space.
200. **Wireless Communication.** Towers, antennas and accessory buildings for transmitting and receiving radio, television, satellite, cellular and microwave, and broadcast tower.
201. **Wrecker Impound Lot.** Any land used for the outside storage of operable vehicles awaiting final disposition.
202. **Wrecker Service Yard.** Any land used for the temporary outside storage of disabled vehicles awaiting final disposition. This definition shall not be applicable to junkyards as defined herein.
203. **Yard.** An open space between a building or use and the adjoining lot lines, unoccupied and unobstructed by any structure or use from the ground upward, except as otherwise provided in Chapter 3: Area and Dimensional Regulations.

204. **Yard, Required.** A yard the depth of which is specified in Chapter 3: Area and Dimensional Regulations of the applicable district.
205. **Yard, front.** A yard extending the full width of the lot between any building and the front lot line and measured perpendicular to the building at the closest point to the front lot line. On corner lots the front yard shall be considered as parallel to the street upon which the lot has its least dimension.
206. **Yard, rear.** A yard extending across the full width of the lot between the principal building and the rear lot line and measured perpendicular to the building to the closest point of the rear lot line.
207. **Yard, side.** A yard extending from the front yard to the rear yard between the principal building and the side lot line and measured perpendicular from the side lot line to the closest point of the principal building.
208. **Zoning Advisory Committee.** A committee composed of seven members of the Commission authorized to approve site development plans, hear and recommend rezoning of land applications and Zoning Ordinance text changes to advise the chief legislative body of the City, all such actions to be taken on behalf of the Commission.
209. **Zone map.** The map referred to in Chapter 9, Article I (Official Zoning Map).
210. **Zoning district map.** The Zone Map.
211. **Zoo.** Any premises, building or enclosure which contains wild animals on exhibition for viewing by the public.

SECTION 2. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 2: Zoning Districts and Permitted Uses; Article II: Permitted Uses Table; Section 6: Permitted Use Table 1.02.201 - MEDICAL USES, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Zoning District	D-1	D-2	D-3	D-4	D-5	D-6	MU-L	MU-M	MU-H	MU-D	C-1	C-2	I-1	I-2	I-3	I-4	PR D	MXD / PUD	HI D	AG
MEDICAL USES:																				
Clinic	X	X	X	X	X	X	PC	P	P	P	PC	P	P	P	P	X	X	PCP	PM P	X
Hospital	X	X	X	X	X	X	X	SE	P	P	X	P	P	X	P	X	X	PCP	PM P	X
Medical Cannabis Cultivator	X	X	X	X	X	X	X	X	X	X	X	X	PC	PC	PC	X	X	X	X	PC
Medical Cannabis Dispensary	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Cannabis Integrated Facility	X	X	X	X	X	X	X	X	X	X	X	X	PC	PC	PC	X	X	X	X	X
Medical Cannabis Processor	X	X	X	X	X	X	X	X	PC	PC	X	X	PC	PC	PC	X	X	X	X	X
Medical Cannabis Secure Transporter	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Cannabis State Testing Laboratory	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	X	X	X	X
Medical Lab	X	X	X	X	X	X	X	SE	P	P	SE	P	P	P	P	X	X	PCP	PM P	X
Opioid Replacement Therapy Treatment Facility	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	X	X	X	X	X	X
Scientific Lab	X	X	X	X	X	X	X	X	SE	SE	X	SE	P	P	P	X	X	PCP	PM P	X
Veterinarian Clinic	X	X	X	X	X	X	X	X	PC	PC	X	PC	PC	PC	PC	X	PC	PCP	PM P	PC

SECTION 3. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 4: Land Use Development Standards; Article II: Uses Permitted With Conditions (PC); Section 4: Medical Uses, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Section 4. Medical uses.

- A. **Clinic.** In the following districts: MU-L and C-1 a clinic shall be permitted provided that the following conditions are met:
 - 1. Clinics shall be limited in size to no more than 7,500 square feet.

- B. **Medical Cannabis Cultivator.** In the M-1, M-1A, M-2, M-3, I-1, I-2, I-3, and AG districts, a medical cannabis cultivator shall be permitted provided the following conditions are met:
 - 1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, and/or the Alabama Department of Agriculture and Industry that the proposed facility meets the requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.

 - 2. Cultivators authorized pursuant to Ala. Code, 1975, § 20-2A-62, as now or hereafter amended, shall operate in accordance with the provisions set forth in Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission and the Department of Agriculture and Industry. Except as specifically provided in this Section, Cultivators shall be governed by the Medical Cannabis Act, the AMCC Rules and the rules of the

Alabama Department of Agriculture and Industries at Title 80 of the Alabama Administrative Code, as now or hereafter amended.

- C. **Medical Cannabis Dispensary.** In the B-2, B-3, B-4, B-5, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis dispensary shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
 2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.
- D. **Medical Cannabis Integrated Facility.** In the M-1, M-1A, M-2, M-3, I-1, I-2, and I-3 districts, a medical cannabis integrated facility, shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
 2. Medical Cannabis Integrated Facility authorized pursuant to Ala. Code, 1975, § 20-2A-67, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis Integrated Facilities shall be governed by the Medical Cannabis Act and the AMCC Rules.
- E. **Medical Cannabis Processors.** In the B-3, B-4, M-1, M-1A, M-2, M-3, MU-H, MU-D, I-1, I-2, and I-3 districts a medical cannabis processor shall be permitted provided the following conditions are met:
1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter

stating that fact from this agency must be provided.

2. Medical Cannabis Processors authorized pursuant to Ala. Code, 1975, § 20-2A-63, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission. Except as specifically provided in this Section, Medical Cannabis Processors shall be governed by the Medical Cannabis Act and the AMCC Rules.

F. **Medical Cannabis Secure Transporter.** In the B-2, B-3, B-4, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis secure transporter shall be permitted provided the following conditions are met:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Secure Transporters authorized pursuant to Ala. Code, 1975, § 20-2A-65, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis Secure Transporters shall be governed by the Medical Cannabis Act and the AMCC Rules.

G. **Medical Cannabis State Testing Laboratory.** In the O&I, B-2, B-3, B-4, B-5, B-6, M-1, M-1A, M-2, M-3, MU-H, MU-D, C-2, I-1, I-2, and I-3 districts a medical cannabis state testing laboratory shall be permitted provided the following conditions are met:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis State Testing Laboratories authorized pursuant to Ala. Code, 1975, § 20-2A-66, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Medical Cannabis State Testing Laboratories shall be governed by the Medical Cannabis Act and the AMCC Rules.

H. **Opioid Replacement Therapy Treatment.** In the MU-H, MU-D, C-2, I-1, and I-2 district, opioid replacement therapy treatment shall be permitted provided that the following

conditions are met:

1. The applicant submits a statement from the State Department of Health, State Health Planning and Development Agency, or the State Department of Mental Health and/or the Jefferson County Department of Health that the proposed facility meets all requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agencies, a letter stating that fact from these agencies must be provided.

I. **Veterinarian Clinic.** In the following districts: AG, MU-H, MU-D, C-2, I-1, I-2 AND PRD a veterinarian clinic shall be permitted provided that the following conditions are met:

1. Outdoor exercise yards shall be permitted provided that they are completely fenced and used only between 7a.m. and 7p.m., when a staff person of the clinic is present in the exercise yard. Where such outdoor activities abut a dwelling zone district or district permitting dwelling use, a 50-foot setback is required.
2. Boarding of animals either undergoing medical treatment or not are permitted as an accessory use subject to the following conditions.
 - a. Accessory animal boarding shall occur within completely enclosed structures.
 - b. No more than thirty percent of the gross floor area of the veterinary clinic may be used as a boarding facility.
 - c. No outdoor kennels or runs are permitted.
 - d. No part of any building or structure in which animals are housed shall be closer than 50 feet from any existing residence located on an adjacent parcel.
 - e. All on-site waste shall be housed either within the boarding facility or an accessory structure, and all waste shall be disposed of in a sanitary fashion no less frequently than one time per week. The drainage of all liquid by-products from the kennel shall be discharged into a permitted sanitary sewer line or septic tank and shall not be disposed of by way of storm sewers, creeks, streams, or rivers.

SECTION 4. BE IT ORDAINED by the Council of the City of Birmingham that Title 1, Chapter 4: Land Use Development Standards; Article III: Uses Permitted by Special Exception (SE); Section 5: Medical use special exceptions, of the City of Birmingham Zoning Ordinance, Ordinance No. 17-51, as amended, is hereby amended to read as follows:

Section 5. Medical use special exceptions.

A. **Hospital.** In the MU-M district, a special exception may be granted by the Board provided that the following conditions are met:

1. When a hospital abuts a dwelling district, screening in the form of a landscape buffer yard shall be applied per Chapter 6, Article III of this Ordinance.

2. When a hospital structure abuts a dwelling district there shall be a minimum setback of 50 feet.
3. A traffic impact study may be required that demonstrates adequate traffic controls are provided as determined by the Traffic Engineer for the City.

B. **Medical Lab.** In the MU-M and C-1 districts, a special exception may be granted by the Board provided that the following conditions are met:

1. Medical Labs in the MU-M and C-1 shall be limited to 7,500 square feet.

C. **Scientific Lab.** In the MU-H, MU-D and C-2 districts, a special exception may be granted by the Board provided that the following conditions are met:

1. No smoke, dust or vibration shall be detectable at the property line.
2. No scientific lab shall be permitted that is required by ADEM to have a permit for release of any kind.
3. When adjacent to a dwelling district, a landscape buffer yard is required per Chapter 6, Article III of this Ordinance and the scientific lab shall be set back from the property line no less than 50 feet.

SECTION 5. That the provisions of this Ordinance are hereby declared to be severable. If any of these sections, provisions, sentences, clauses phrases, or parts are held to be unconstitutional or void, the remainder shall continue in full force and effect.

SECTION 6. That this Ordinance shall become effective upon publication as required by statute.

Adopted by the Council November 29, 2022 and Approved by the Mayor November 30, 2022



A CERTIFIED COPY
Lee Frazier, City Clerk
Birmingham, Al
Lee Frazier

Zoning Verification Letter – Attachment to Exhibit 31, Section 31.5

CITY OF BIRMINGHAM

Department Of Planning, Engineering & Permits

710 North 20th Street

City Hall | Room 210

Birmingham, Alabama 35203



PUTTING PEOPLE FIRST

RANDALL L. WOODFIN
MAYOR

KATRINA THOMAS
DIRECTOR

13 December 2022

To Whom It May Concern:

The property located at _____ is zoned CB-2, Contingency General Business District. Properties to the north, south, and west are also zoned CB-2. Properties to the east are zoned R-3 (Single Family District). The property is located in the Woodlawn Neighborhood and is located in Council District 4. According to the City of Birmingham’s Geographic Information System (GIS), the property is not located in a regulated floodplain or Commercial Revitalization/Historic District.

A Medical Cannabis Dispensary is permitted with conditions in this zoning district. The conditions include:

1. The applicant submits a statement from the Alabama Medical Cannabis Commission, AMCC, that the proposed facility meets requirements for operation and that all applicable and/or appropriate license or licenses have been obtained. If no license or licenses are needed or required for operation from the above listed agency, a letter stating that fact from this agency must be provided.
2. Medical Cannabis Dispensaries authorized pursuant to Ala. Code, 1975, § 20-2A-64, as now or hereafter amended, shall operate with the provisions of Ala. Code, 1975, § 20-2A-1, et seq., as now or hereafter amended, and shall comply with all Rules and Regulations of the Alabama Medical Cannabis Commission, AMCC. Except as specifically provided in this Section, Dispensaries shall be governed by the Medical Cannabis Act and the AMCC Rules.

This letter is only to confirm zoning information for the location provided in your request but does not verify that the location meets the spacing required for a dispensary. This letter does not approve the use of the medical cannabis dispensary at the above-mentioned address. All medical cannabis related uses in the City of Birmingham must be approved by the Alabama Medical Cannabis Commission and shall comply with the Rules and Regulations of the Alabama Medical Cannabis Commission.

Sincerely,

Handwritten signature of Kimberly D. Speer in cursive script.

Kimberly D. Speer
Zoning Administrator

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 32 – Engineering Plans and Specifications (Cultivation 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual

James A. Leventis
Signature of Verifying Individual

3/3/2023
Verification Date

32.1 Engineering Plans and Specifications

The Applicant has provided a detailed plan with elevation drawings of all operational areas involved with the production of cannabis plants inclusive of dimensions and elevation referenced to a single-facility benchmark on page 11 and 12. The Applicant has provided a cross-section that show the construction details on page 13 with dimensions on page 8 and provided verification of construction materials on page 12. Enhancement for security measures, and bio-security measures are found on pages 19 and 20. The Applicant has identified:

- All employee-accessible nonproduction areas on page 19 and 20.
- The location, size, and capacity of all storage areas on page 11, ventilation systems on pages 14 & 15), and equipment used for the production of cannabis on page 15.
- The location and doors can be found on page 9 and material specifications on page 16 of all entrances and exits to the cultivation facility, as well as the physical makeup and specifications of all outer walls of the enclosed structure on page 12.
- The location and specifications of any windows on page 12. There are no skylights nor roof hatches within the design of the building.

The security designs on pages 19 and 20 show the following: 1) the location of all monitoring cameras and their field of view, verified to be operating 24 hours per day, 2) the location of all alarm inputs (door contacts, motion detectors, duress/hold up devices) and alarm sirens, 3) the location of the digital audio/video recorder and alarm control panel, 4) the location of all restricted, employee-accessible and public areas. The location where all plant inputs and application equipment are stored are found on page 11. The location of all enclosed, secure areas or loading/unloading docks out of public view for the loading/unloading of cannabis or medical cannabis into or out of any motor vehicle for secure transport are found on page 4. The location of any area used to store medical cannabis that has been returned to the cultivation facility from a processor or dispensary on pages 4 for phase I and page 5 for phase II.

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

PROPOSED LEGEND

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

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FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information


Exhibit 33 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

33.1 Alarm System

The Alarm Monitoring System will secure the Applicant’s facilities, vendors, purchasers, visitors, inventory, cash, and assets from theft, break-ins, and robberies. The Applicant will install a twenty-four-hour alarm system in all facilities where cannabis or medical cannabis products are present.

Central Alarm System Monitoring - When the Applicant's facilities are closed, the alarm system will detect unauthorized access or movement in all required areas on the premises after the agents have vacated.

The Applicant will make available to the Commission, upon request:

33.10 Medical Cannabis and Cash Movement at the Beginning and End of each Day

The Applicant has designed rigorous protocols for the beginning and end of each day to secure the movement of medical cannabis and cash between secure areas and sales areas and maintain the security of daily cash on hand. All movements of medical cannabis and cash will be tracked and documented

which is also linked to METRC, the Statewide Seed-to-Sale Tracking System. In addition to the digital logs, handwritten log sheets must be filled out and stored for review. All records, digital or handwritten, for the handling of medical cannabis and cash will be kept for a minimum of two (2) years.

33.11 Dispensing Site Access

In compliance with **Rule 538-x-2-.07**, upon entry into a dispensing site and before purchasing medical cannabis, patients and caregivers are required to provide their medical cannabis card and a secondary Commission-approved government-issued photo identification. Any persons, including children or guests of patients or caregivers, who are unable to provide a medical cannabis card matching a valid patient registry profile, or who are unable to provide, upon request, additional identification to the satisfaction of dispensing site personnel is prohibited from entering the dispensing site. This rule does not apply to employees, representatives of other licensees, Commission members or personnel or inspectors, third parties visiting the dispensing site at the request of the Commission or the licensee, or who are entering the facility for the purpose of performing repairs or maintenance at the dispensing site. Members of the public, other than patients and caregivers holding a valid, unexpired, unrevoked medical cannabis card, are not allowed inside a dispensing site. All visitors will be greeted by the Applicant's receptionist as soon as they enter the dispensing site.

If a visitor enters the reception area and is not a patient or caregiver holding a valid, unexpired, unrevoked medical cannabis card, they will be denied access to the site. If visitors need to enter the Applicant's dispensing site, it is the receptionist's job to ensure they enter their information into the Applicant's Visitor Monitoring System (VMS). The lobby will also be where employees and visitors entering the dispensing site receive their visitor badges.

33.12 Recordkeeping

Records, whether electronic or manual, will always be kept of all persons on the premises at a facility, including employees, vendors, transporters or other licensees, and all others, recording everyone's name, the date and time of ingress and egress, and (as to non-

employees) the reason for their presence. All records will be kept for a minimum of two years and longer at the request of the Commission or law enforcement.

An employee at Facility – Once an employee arrives on the premises, they must log into the Applicants Visitor Monitoring System (VMS) before their Employee Badges with Access Control works.

Visitor at Facility - Any person entering the premises will electronically sign into the VMS and prompted to provide their name, company affiliation, the reason for the visit, and the time of the visit. Before access granting to the facility, the receptionist will verify their ID with the information entered in the VMS.

33.13 Identification Badges

The Applicant's agents must hold a validated access badge that clearly identifies them as employees while on duty. Failure of any person to correctly display such a badge may constitute grounds for discipline. The Applicant will not alter, obscure, damage, or deface the badge, including any information contained or represented thereon, in any way.

33.14 Visitor Passes

Visitor management for the Applicant's facilities is essential to ensure the highest level of security at each facility. Before access, each visitor shall log in to the Applicants VMS portal and present valid government-issued identification for verification.

33.15 Policies to report theft, diversion, or other loss of cannabis products

The Applicant will notify the Commission no later than the next business day, followed by written notification no later than ten business days, of any of the following:

The Applicant will maintain, review and update policies to report theft, diversion, or other loss of cannabis products to the Commission and law enforcement as early as practicable and not more than

24 hours from the event or its discovery. Any theft, diversion, or other loss of cannabis products will immediately be reported in the Statewide Seed-to-Sale Tracking System.

Responsibility of Employees - The Applicant's agents must immediately report all irregularities indicating actual or suspected loss, fraud, embezzlement, or similar impairment of the Applicant's funds, property, or suspicious persons or activity. It shall be considered unacceptable job performance if a person has actual or constructive knowledge of any irregularity and does not report it to their supervisor. Upon becoming aware of discrepancies identified during inventory, diversion, theft, loss, or unauthorized destruction of any cannabis or any loss or unauthorized alteration of records related to cannabis, the Applicant shall immediately notify; (1) appropriate law enforcement authorities; and (2) the Commission.

33.16 Signage

The 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 the information depicted above.

Secure Transport Security Plan and Procedures

The Applicant has purchased a 2016 Ford Transit Connect, registered, insured, and in the processional control of the Applicant, to perform all transports when licensed.



33.23 Secure Transport Vehicle Communications and Alarms

Transport Vehicle Emergency Kit - All STVs will be equipped with a spare tire and an emergency kit and a roadside safety kit, including a first aid kit, car battery, fire extinguisher, flares, fuses, an emergency escape tool, one spare tire, reflective triangles, a car jack, tire/lug wrenches, coolant, water, jumper cables, tire chains, and reflective vests. Before undertaking any transportation duties, agents will complete training on the use of the kit and the supplies contained therein, including when it is or is not permissible to use the supplies. A weekly inventory check will be conducted by the transportation agents to ensure that each piece of emergency equipment is present and that it is operational. Emergency contact sheets will be stored in the glove department of each STV.

33.26 Secure Transport Driver Training

Secure transport drivers shall be trained in and have ready access to security procedures for undergoing administrative inspection by law enforcement pursuant to § 20-2A-65(c), Code

of Alabama 1975 (as amended). All secure transport agents will always carry an employee ID card when transporting or delivering cannabis and/or medical cannabis; upon request, the ID card must be presented to the Commission or law enforcement officer acting in the course of official duties. Agents will be given agent training materials as well as provided classroom instruction on all training topics including inspections by law enforcement and proper employee ID card procedures. New hires will need to pass testing before beginning work. Those who do not pass will receive additional training and subsequent retesting. Shadowing will occur as well as part of training, first with new hires watching senior employees, followed by the new hire performing tasks with the oversight of a senior agent.

Agent Training / Trainers - The Applicant's Director of HR and COO will train staff on company policies and applicable laws. The transportation manager will train staff on transportation-specific SOPs, including safe driving and security procedures. The Applicant's Director of HR will develop and oversee the training curriculum, in consultation with on-staff leadership and any necessary contractors, and will maintain copies of all training materials on-site, including staff attendance, the employee handbook, and copies of any written materials used in training, as well as off-site backups. The Applicant's Director of HR, COO, CCO, and Transportation Manager will work collaboratively to update company policies and SOPs pursuant to changes in applicable state and local laws, to retrain employees on changes, and to provide continuing education programs to promote a culture of continually exceeding requirements.

Transportation Agent Training Curriculum - All transportation agents will be required to complete procedural and emergency training related to the transport of cannabis and/or medical cannabis.

33.27 Labels and Containers for Storage or Transport

Individual batches of cannabis or medical cannabis prepared for storage or transport will be appropriately labeled and inserted in containers prior to transport.

33.28 Secure Transport Vehicle Personnel

Required Personnel - The Applicant's transportation operation will initially be comprised of one Transportation Director and four Secured Transport Drivers to meet the supply-demand. All secure transporters will report to the Applicant's Transportation Director. The Transportation Director will work closely with the CCO to ensure all regulatory standards are being met. The CCO will work with the transporters to craft knowledge check tests to ensure all transportation staff understands applicable Alabama cannabis and traffic regulations thoroughly.

Transportation Agent Hiring Protocol - The Applicant will hire Secure Transport Drivers who will be responsible for the secure transportation of high-value assets including cannabis, medical cannabis, and cash. While hiring for the positions, the Applicant will give preference to highly trained US Military Veterans with experience in the secure transportation of high-value assets. A thorough background investigation will ensue upon hiring to ensure the candidate has no criminal background or any record of theft. Candidates for the Secure Transport Driver position must have a valid driver's license to be considered. The Applicant will not hire any candidates under the age of 21 years, who are not able to obtain a driver's license (if engaging in transportation job duties), who have a history of poor driving (e.g., numerous accidents, speeding tickets, or other traffic violations; this only applies if engaged in transportation job duties), who have had any disqualifying conviction, or who have had any convictions for any offenses that call the candidate's integrity into question, such as theft from a prior employer.

33.29 Secure Transport Route Plan

STVs carrying cannabis and/or medical cannabis will always adhere to the designated route or alternate route. If an alternate route is necessary, the driver will contact the security center and note the change in the route plan. Route plans will be detailed in the transport manifest and will account for and anticipate timing for all scheduled stops.

33.31 Applicant's Verification for Secure Transportation

By signing below, the Applicant verifies that route plans, manifests, transport logs, freight bills, bills of lading, and any free-on-board (“FOB”) terms of sale documents, maintenance and repair records, and insurance documentation will be kept (either manually or electronically, including, but not limited to, as part of the Statewide Seed-to-Sale Tracking System), as to all vehicles in the secure transporter’s fleet, for a period of not less than two (2) years, and longer upon the request of the Commission or law enforcement. Such documents shall be made available to the Commission or its representatives (including inspectors) during inspections and other official visits.



Signature of Responsible Person

03/03/2023

Verification Date

33.32 Applicant's Verification for Security Inspections

By signing below, the Applicant verifies that upon request, it will make available to the Commission or its inspectors all information relating to the Applicant’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, secure transport security plan and procedures, and any other security-related information deemed relevant by the Commission or its inspectors.



Signature of Responsible Person

03/03/2023

Verification Date

Conclusion

The Applicant summarizes its security system inclusive of broadcast communication, audio/video surveillance, fencing, doors/locks, walls, security guards, access controls, cash movement protocols, recordkeeping, badging, visitor protocols, reporting, and transportation protocols encompass the ethos of the security. By utilizing proven tactics and approaches honed and perfected in other markets, the Applicant is confident in the ability to protect patients, staff, products, property, and the surrounding community.

**Security Diagram for Cultivation/Processing Facility – Attachment to Exhibit 33,
Section 33.1**

Alarm System for a Dispensing Site – Attachment to Exhibit 33, Section 33.1

**Audio/Video Surveillance Systems for a Dispensing Site – Attachment to Exhibit 33,
Section 33.4**

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 34 – Personnel

Verification

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

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

34.1 Introduction

Below is a roster of all personnel (all leaders and employees) affiliated with the Applicant, including names, street addresses, contact telephone numbers, email addresses and social security numbers, current to within thirty (30) days prior to the date of application, and the Applicant's verification that, if the Applicant is issued a business license, all employees will be registered to the AMCC website and will undergo appropriate pre-employment background checks. See attached FORM G - Personnel Roster & Verification (identified as "FORM G - Personnel Roster & Verification – Attachment to Exhibit 34, Section 34.1").

FORM G - Personnel Roster & Verification – Attachment to Exhibit 34, Section 34.1

FORM G: PERSONNEL ROSTER & VERIFICATION

Verano Alabama, LLC

Business License Applicant Name

Integrated Facility

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.

George Archos

Leader/Employee Name

Chief Executive Officer

Title/Position

City

State

Zip

Edward Brown

Leader/Employee Name

Advisory Board Chairman

Title/Position

City

State

Zip

R. Michael Smullen

Leader/Employee Name

Pharmaceutical Advisor

Title/Position

City

State

Zip

Cristina Nunez
Leader/Employee Name

Financial Advisor
Title/Position

City State Zip

Lawrence Hirsh
Leader/Employee Name

M&A Advisor
Title/Position

City State Zip

Mary Margaret Lanier Long
Leader/Employee Name

Chief Agricultural Officer
Title/Position

City State Zip

John Tipton
Leader/Employee Name

President
Title/Position

City State Zip

Darren Weiss, Esq.
Leader/Employee Name

Chief Operating Officer
Title/Position

City	State	Zip
<u>Brett Summerer, MBA, CPA</u>		<u>Chief Financial Officer</u>
Leader/Employee Name		Title/Position

City	State	Zip
<u>James Leventis, Esq.</u>		<u>Chief Compliance Officer</u>
Leader/Employee Name		Title/Position

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

Aaron Miles, MSF
Leader/Employee Name

Chief Strategy Officer
Title/Position

City State Zip

Paul Lanham
Leader/Employee Name

Chief Technology Officer
Title/Position

City State Zip

Destiny Thompson
Leader/Employee Name

Chief Diversity and Inclusion Officer
Title/Position

City State Zip

David Spreckman
Leader/Employee Name

Marketing Director
Title/Position

City State Zip

Lindy Kalar Human Resources Director
Leader/Employee Name Title/Position

City State Zip

Scott Goddard Training Director
Leader/Employee Name Title/Position

City State Zip

Mark Kacynski Security Director
Leader/Employee Name Title/Position

City State Zip

Rino Ferrarese
Leader/Employee Name

Quality Director
Title/Position

City State Zip

Mitch Tipton
Leader/Employee Name

Cultivation Director
Title/Position

City State Zip

Max Zhang, PhD
Leader/Employee Name

Processing Director
Title/Position

City State Zip

Tyler Vaughn
Leader/Employee Name

Transportation Director
Title/Position

City State Zip

Kaleb Jones
Leader/Employee Name

Secure Transport Driver
Title/Position

City State Zip

Tanka Asongna-Morfaw
Leader/Employee Name

Dispensary Director
Title/Position

City State Zip

Krissy Bernazani, RPH
Leader/Employee Name

Medical Director
Title/Position

City State Zip

Chad Booth, PharmD Certified Dispenser
Leader/Employee Name Title/Position

City State Zip

Maria Dawn Strickland, PharmD Certified Dispenser
Leader/Employee Name Title/Position

City State Zip

Kim Belviy, PharmD Certified Dispenser
Leader/Employee Name Title/Position

City State Zip

Leah Zaborney, PharmD
Leader/Employee Name

Certified Dispenser
Title/Position

City State Zip

Khang Hoang PharmD
Leader/Employee Name

Certified Dispenser
Title/Position

City State Zip

Charles Branscomb
Leader/Employee Name

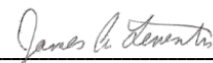
Secure Transport Driver
Title/Position

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.

James Leventis, Esq.
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

12/25/2022
Verification Date

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

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detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 35 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

35.1 Curriculum Vitae for the Business

The Applicant's curriculum vitae, demonstrated in the image pictured right, best shows the cannabis operating and financial capacity of the Applicant. As a top three worldwide publicly traded cannabis company, the Applicant remains one of the largest and most established in the industry. Since its inception, the Applicant has been profitable with industry-leading margins. **(1) The Chief Executive Officer (CEO)** has led one of the largest cannabis companies in the world from infancy through Initial Public Offering (OTCMKTS: VRNOF). As CEO, he grew the company to a market capitalization exceeding \$2.7B, a global workforce surpassing 4,000 employees, and expansion into 17 states. He manages and operates 125 retail dispensaries with cultivation/ processing facilities in 17 locations built over the last ten years, making him a renowned titan within the cannabis industry.

(2) The Chief Agricultural Officer, a lifelong Alabama resident, has farmed her entire adult life. With over 52 years of total commercial horticulture experience, she has extensive experience in farming. Crops include corn, seed cotton, soybeans, wheat, and industrial hemp. At 16, she was declared an adult by the State of Alabama following the tragic death of her parents. She petitioned the state for adulthood to farm the land and apply for loans for farming equipment for the land she still farms today. **(3) The President** has served the Applicant since 2014, and is instrumental in the management and ongoing success of MÜV's 115,000 square foot processing and cultivation facility in Ruskin, FL. Under his leadership the Applicant serves nearly 200,000 patients over 61 dispensary locations throughout Florida.

(4) The Chief Operating Officer (COO) brings seven years of cannabis experience and twelve years of corporate law experience. He currently sits on the Executive Committee, and Board of the Maryland Wholesale Medical Cannabis Trade Association.

(5) The Chief Financial Officer (CFO) has twenty years of professional finance experience, with six in cannabis finances. He then spent ten years at General Motors as CFO. Most recently, he

served as V.P. and CFO of Kraft Heinz.

(6) The **Chief Compliance Officer** has ten years of cannabis experience and oversees Legal, Regulatory Compliance, and Government Affairs for a publicly traded cannabis company.

(7) The **Chief Technology Officer (CTO)** has twenty years of cannabis and enterprise information systems experience. He sits as CTO of a publicly traded cannabis company where he manages all I.T. operations. Prior roles include CIO of Crocs, Inc., managing \$1.5 billion in global revenue managing 145 retail locations worldwide.

(8) The **Chief Diversity and Inclusion Officer** has over 20 years of human resources and DEI experience. She served on the executive team leading Stout's people strategy and 15 years at Huron Consulting Group, leading and scaling many businesses globally for transformative diverse growth.

(9) The **Chief Strategy Officer** currently serves as Chief Investment Officer of a publicly traded cannabis company, and over the course of his more than 19 years of financial and capital markets experience, he has served in leadership roles across a variety of Fortune 500 companies and industries.

(10) The **Processing Director** is the manufacturing supervisor and lab compliance manager for a publicly traded cannabis company, overseeing the facility's extraction and processing methods and procedures.

(11) The **Cultivation Director** manages the cultivation operations in seventeen cannabis cultivation locations encompassing 1 million square feet of production space. He was instrumental in developing a transdermal cannabis patch in collaboration with the University of South Florida.

(12) The Dispensary Director leads, directs, and supports retail operations of 12+ locations managing over 120 employees. He currently possesses the C.D.C.'s Guideline for Prescribing Opioids Certification, Certified Pharmacy Technician Certification, Dispensary Tech I Online Training, Certificate, and American Red Cross First Aid and CPR/AED Certification.

(13) The Medical Director is a registered pharmacist in the state of Maryland with over 25 years of medication dispensing experience in multiple practice settings. She was selected as the Maryland Representative of the International Society of Cannabis Pharmacists in September 2019.

(14) Certified Dispenser 1 is an Alabama local pharmacist that lives within forty-five minutes of proposed dispensary site one. Certified Dispenser 1 was awarded the illustrious Five-Year Service Award from U-Save Pharmacy for his dedicated work.

(15) Certified Dispenser 2 is an Alabama local pharmacist that lives within sixty minutes of proposed dispensary site two. She has made countless impacts with her patient population, through simple counseling on over-the-counter products and medication packaging to ease compliance issues.

(16) Certified Dispenser 3 is an Alabama local pharmacist that lives within thirty minutes of proposed dispensary site three. She has over 25 years of dispensing medications and working in a retail pharmacy setting.

(17) Certified Dispenser 4 is an Alabama local pharmacist that lives within thirty minutes of proposed dispensary site four.

(18) Certified Dispenser 5, an Alabama local pharmacist lives within seventy-five minutes of proposed dispensary site five. **(19) The Transportation Director** is the current VP of Supply Chain at a publicly traded cannabis company, where she continuously develops and implements all aspects of the supply chain.

(20) The Human Resources Director completed her . She is an

expert in corporate HR functions such as, payroll, benefits, workers comp, and more.

. **(21) The Training Director** is a member of MENSA and has an additional seven years of direct cannabis training and education experience in manufacturing, retail, and food service environments. He retains the titles as ISO 9001 auditor, luthier, and master machinist.

(22) The Security Director has extensive experience developing and implementing security solutions in 100 plus cannabis retail and cultivation/ processing locations across the U.S. Before entering the cannabis industry, he held the position of Supervisory Special Agent/Attorney with the United States Department of Justice, Drug Enforcement Administration (DEA) for 30 years.

(23) The Secure Transport Driver 1 has a Class A CDL and was a Heavy Equipment Operator and Combat Engineer for the E-4 Army as well as a delivery driver at publicly traded cannabis company for a combined 9 years.

(24) The Secure Transport Driver 2 also has an active CDL and has driven commercially since 1999. **(25) The Quality Director** is the management representative for ISO 9001:2008/ISO 13485:2003 system and manages all aspects and functional areas of the QA department in compliance with worldwide regulatory and cGMP requirements for ISO quality standards.

(26) The Marketing Director brings a decade of advertising and marketing experience managing public/media relations efforts, and visual merchandising at all retail locations. His previous clientele includes legacy brands Philips Norelco, Solo Cup, STARZ Entertainment, Nissan, and TransUnion.

(27) The Cultivation Advisor is an author, publisher, and cannabis cultivation expert well known for his advocacy in the push towards the legalization of cannabis use. He is recognized worldwide as a leading authority on cannabis with 40 years as America's "Guru of Ganja". He is also the founder of "High Times" magazine. **(28) The**

Cannabinoid Research Advisor has over seven years of cannabis research experience “at the bench” and over eleven years of cultivation experience.

35.2 Detailed Explanation of the Role each Leader

C-Level | The **Chief Executive Officer** ultimately retains responsibility for the Applicant's performance, including compliance, safety, strategy, and profitability while executing the vision and mission of the company. The CEO maintains authority over all C-Level positions. Duties include setting broad goals for performance and growth and evaluating performance by analyzing and interpreting data and metrics. The **Chief Operating Officer** retains responsibility for strategic decision-making, policy development, and implementation for all business units. Duties include accountability for the operation's performance (construction, environmental impact, marketing, sales, insurance, bonds, facilities, service, quality, and finances) of all business units. The **Chief Financial Officer** retains accountability for the company's administrative, financial, and risk management operations. Duties include tax compliance, financial reporting, the development of a financial and operational strategy, metrics tied to that strategy, and the ongoing development and monitoring of control systems designed to preserve company assets and report accurate financial results. The **Chief Technology Officer** holds responsibility for leading and overseeing all technical aspects of the company. Duties include oversight of information technology strategy while implementing policies and goals for the IT department. This ensures organization and state regulatory system compliance, including Statewide Seed-to-Sale Tracking System operations. The **Chief Compliance Officer** develops and implements regulatory compliance strategies to ensure employees, processes, and facilities remain compliant. Duties include working with state, local, and federal governments to remain compliant, including zoning, inspections, auditing of tracking systems, labeling/ packaging, onsite audits, and renewal of operational licenses. The **Chief Diversity and Inclusion Officer** is responsible for guiding efforts to conceptualize, define, assess, nurture, and cultivate diversity and inclusion as an institutional and educational resource. Duties include affirmative action/equal employment

opportunity regarding the constituent needs of minorities, women, veterans, disabled, and other bounded social identity groups. The **Chief Agricultural Officer** advises cultivation facility improvements, including propagation, vegetation, and storage of cannabinoid-based products. Duties include ensuring company policies remain upheld, and company-provided standard operating procedures are followed. The **Chief Strategy Officer** retains responsibility for analyzing business and system processes, competitive dynamics, market share changes, organization capabilities, and strategic risks. Duties include evaluating the overall business portfolio and ensuring initiatives at all levels align with the company's standards. The **President** reports to the CEO and oversees the business operations while ensuring the Applicant has effective procedures in place to direct operational efficiency. Duties include driving operating capabilities to surpass patient satisfaction and retention.

Directors | The **Cultivation Director** retains accountability for cultivation operation's performance and compliance. Responsible for supervising and managing the daily cultivation operations. Duties include supervising all phases of cultivation operations, including regulatory compliance with state law regarding production, and quality control. The **Processing Director** retains oversight of the extraction laboratory, and operates, maintains, and troubleshoots all processing and infusion equipment. The Processing Director manages extraction techniques, formulations, dosing, and processing compliance. Duties include the oversight of product weighing, packaging, labeling, and documentation of all products. The **Transportation Director** manages, directs, and executes the supply chain program, including manifest creation, tracking systems, and staffing. Duties include the management of all logistics of product transport, vehicle insurance, CDL compliance, third-party Secure Transporters, security of transports, and all product in transport. The **Dispensary Director** creates and maintains effective SOPs and KPIs to ensure operational, procedural, and performance compliance for dispensary locations. Duties include Statewide Seed-to-Sale Tracking System management (patient and physician registry), store compliance, coaching, supporting, and inspiring team members of the dispensing operations. The **Certified Dispensers** are responsible for managing dispensary employees and have undergone training and certification as required by the Commission.

Duties and responsibilities include the requirements outlined in Rule 583-x-8-.03. The **Medical Director** retains responsibility for defining and implementing the performance improvement program and patient outcome measurement system in collaboration with the quality improvement department. Duties include business and market development, medical research and planning, coordination with medical professionals, and hiring and directing the day-to-day activities of medical staff. The **Security Director** manages day-to-day security business operations while maintaining the security program inclusive of security plans and procedures outlined in **Rule 538-x-3-.05** and **538-x-4-.07**. Duties include managing security systems and local security contracts to ensure compliance and safety protocols are followed for all cannabis products within the supply chain. The **Human Resources Director** manages all HR practices, including performance management, employee engagement and development, inclusion and diversity, and talent development initiatives. The Human Resources Director manages the roster of all leaders and employees. Duties include hiring, new hire orientation, staffing, compensation, wellness and benefits, training, continued education, employee handbook management, development, and team relations. The **Training Director** retains accountability for providing direction and leadership in the planning, development, and execution of the company's training strategy. Duties include analyzing the business needs from a training and cannabinoid therapy perspective recommending training and operations solutions. Training all personnel on regulations, compliance, job duties, and patient outcomes. The **Quality Director** directs processes and product testing to ensure quality standards are met during production. Ensures procedures are implemented to maintain compliance with the quality systems requirements defined by the quality system manual. Duties include planning and directing quality assurance policies, programs, and initiatives, including complaints, investigations, recalls, remediation, and product testing compliance. The **Marketing Director** retains responsibility for all activities related to conceptualizing and implementing the Marketing and Advertising Plan compliant with Commission and federal regulations, inclusive of public relations. Duties include business and market development, market research and planning, packaging & labeling compliance, strategic direction for advertising.

35.3 5-year hiring plan

What follows is an outline of the Applicant’s 5-year hiring plan for its employees, identifying the types, positions, required education, required experience, and expected roles of such personnel. The table depicted on the right summarizes the Applicant’s 5-year hiring plan, showing the estimated number of positions created at all Integrated Facility locations.

Cultivation Division | Cultivation Agents monitor and maintain plant production and health. They maintain organization, cleanliness, and efficiency of production areas. Responsible for compliance with **Ala. Admin. r. 80-14-1, et seq.** Cultivation Agents manage all protocols for preventing pests employing techniques for identifying, managing, and eliminating pests. Five-plus years in cannabis operations are required with a bachelor’s degree or higher in Horticulture. Duties include daily plant care within all plant life cycles, including nutrient management, pruning, harvesting, and trimming while performing plant tracking in accordance with regulations and company standards also scouting, eradication, tracking, and prevention of pest and pathogens. Headcount over five years (4, 10, 15, 20, 20)

Processing Division | Processing Agent assists with facilitating processing operations, including operations of processing equipment and devices, while aiding in the creation of batch production records and labels following standards. Five-plus years in cannabis processing operations are required with a bachelor’s degree or higher in Chemistry. Duties include assisting with the weighing, packaging, labeling, and documentation of all products (5, 8, 12, 15, 21). **Packaging Agents** supports packaging operations. Two-plus years of professional experience are required, and a bachelor’s degree or higher is preferred in Business. Duties include tracking, prepping, cleaning, labeling, wrapping, and operating production and packaging machinery (4, 5, 7, 10, 15). **Laboratory Agents** are responsible

for assisting in product testing, processing, and formulation. Five plus years of professional cannabis laboratory experience are required with a bachelor's degree or higher in Chemistry. Duties include compliance with **Chapter 10** and performing qualitative and quantitative chemical and microbiological analysis methods (1, 1, 4, 4, 5). **Quality Agents** retain responsibility for assisting with quality-related activities at the facility associated with incoming inspection, start-up verification, in-process verifications & checks, and sampling and inspection of finished products. Two-plus years of quality systems experience are required with a bachelor's degree or higher in Quality Systems Management (1, 2, 3, 4, 5).

Transportation Division | Secure Transport Drivers are responsible for safely delivering products, cash, and valuables to and from the production facility and company-owned dispensaries. Five-plus years in secure transport operations and a bachelor's degree or higher are required in Logistics with an active CDL license. Duties include compliance with **Chapter 7** of the Rules, enforcement of rules to protect the shipment of cannabis, products, and cash, as well as the safety of personnel involved in the transportation, freight, and receiving of high-value assets (Headcount over 5 Years = 4, 10, 15, 20, 20).

Dispensary Division | Certified Dispensers are responsible for managing dispensary employees and have undergone training and certification as required by the Commission. Certified dispensers must have at least two years of education or experience in biology, biochemistry, chemistry, physiology, pharmacology, medicine, medical cannabis, nursing, pharmaceuticals, or a similar field (5, 5, 6, 6, 7). Duties and responsibilities include the requirements outlined in **Rule 583-x-8-03**. **Dispensary Agents** assist the Dispensary Management team in all operational aspects of running the dispensary and ensuring each patient receives outstanding service by providing a positive and friendly environment. Dispensary Agents will assist patients and customers with their needs, maintaining solid product knowledge and always providing the highest level of customer service. Four-plus years of professional experience are required, and a bachelor's degree or higher in Business is preferred. Duties include compliance with **Chapter 8**, dispensing medical cannabis, inventory tracking compliance, sanitation, auditing, and product explanation. Dispensary

Agents are responsible for greeting customers promptly, keeping organized patient records, and helping patient schedules flow smoothly (Headcount over 5 Years = 45, 50, 55, 60, 70).

Operations Division | Security Guards ensure company facilities, employees, patients, and products, including following established procedures and policies. Two-plus years of professional security experience are required, and a bachelor's degree or higher in Security Systems is preferred. Duties include conducting security checks, viewing security monitors, and reporting significant problems to authorities, state regulators, and company leaders assigned as the first point of contact (12, 14, 20, 25, 30). **Inventory Agents** are responsible for data input, quality, and audits. Two-plus years in cannabis inventory operations are required with a bachelor's degree or higher in Compliance. Duties include compiling and verifying inventory records to confirm product compliance requirements are met while maintaining compliance within BioTrack/Metric (2, 4, 8, 10, 12). **Information Technology Agents** support day-to-day IT business needs such as troubleshooting laptops, desktops, printers, tablets, conference rooms, and operational software. Two-plus years in information technology operations are required with a bachelor's degree or higher in Information Technology. Duties include installing hardware onsite, working as part of a support team for a product launch, or as a tester for a new IT service (2, 4, 6, 8, 10). **Maintenance Agents** are responsible for overseeing and managing facilities and surrounding locations. Two-plus years in maintenance operations are required with a bachelor's degree or higher preferred. Responsibilities include creating, overseeing, and maintaining equipment maintenance programs for all locations statewide and the upkeep of the facility including plumbing, electrical, carpentry, and HVAC (Headcount over 5 Years = 14, 16, 18, 20, 22).

35.4 Conclusion

As shown above, the credentials and roles of the Applicant's leadership, including the meticulous 5-year hiring plan, displays the Applicant's ability to far exceed the requirements of operating an effective, safe, and responsible Integrated Facility in Alabama.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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License Type: Integrated Facility

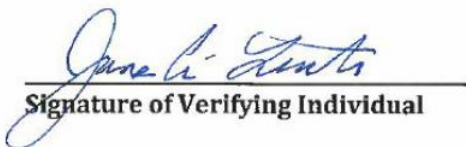
Exhibit 36 – Employee Handbook

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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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License Type: Integrated Facility

36.1 Introduction to the 5-Page Summary of Employee Handbook

Attached to this 5-page summary is a verified copy of the Applicant's proposed *Employee Handbook*, including, but not limited to, policies on personnel safety and crime prevention techniques (identified as "Employee Handbook – Attachment to Exhibit 36, Section 36.1"). The Applicant's Employee Handbook is organized into eight sections, as follows: (1) Employee Introduction; (2) Employment; (3) Employee Rules and Regulations; (4) Time Off & Pay; (5) Benefits; (6) Health and Safety; (7) Employee Services; and (8) Employee Development. Additionally, the Applicant's *Employee Handbook* includes an addendum intended to inform employees about certain employment-related benefits required under Alabama and local law that may be different than those described in the main Employee Handbook. The Applicant will briefly summarize each section of the *Employee Handbook* in the following pages.

36.2 Section 1: Employee Introduction

The first section of the Applicant's Employee handbook includes a welcoming statement, a high-level description of the employee handbook, and an explanation of the at-will employment status. For instance, Section 1 describes that the Employee Handbook only contains general information and guidelines. It is not intended to be comprehensive or to address all the possible policies, procedures, benefits, or expectations. Therefore, if employees have any questions concerning eligibility for a particular benefit, the applicability of a policy, practice, or procedure, or the Applicant's expectations, they should address specific questions to the Human Resource Director. Similarly, Section 1 states that the employment relationship is based on the mutual consent of the employee and the company and, therefore, is "at-will." This means that each employee's employment with the company is voluntary, and either the employee or the company can terminate the employment relationship at any time.

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36.3 Section 2: Employment

The second section of the *Employee Handbook* covers the following topics:

the Applicant will provide equal employment opportunities (EEO) to all employees and applicants for employment without regard to race, color, religion, creed, gender, sex, pregnancy, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, marital status, ancestry, childbirth or related medical condition, status as a covered veteran or any other protected class in accordance with applicable federal, state and local laws except where a bona fide occupational qualification applies. Similarly, the Applicant will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job.

36.4 Section 3: Employee Rules and Regulations

The third section of the Applicant's *Employee Handbook* outlines the rules and regulations as it pertains to employment at the company, including:

The Applicant's general standards of conduct exist to ensure orderly operation and provide the best possible work environment. These standards of conduct should rule employee business relationships with the company, fellow employees,

customers, and all other individuals. All employees must read and acknowledge their understanding and willingness to apply these standards in their daily personal conduct by signing the handbook acknowledgment form. Employees who deviate from these rules and standards may be subject to disciplinary action, up to and including termination of employment. Equally important, the Applicant is committed to providing a work environment free of discrimination and unlawful harassment.

36.5 Section 4: Employee Time Off and Pay

Section 4 of the Applicant's *Employee Handbook* focuses on generous time off and pay policies, including:

36.6 Section 5: Employee Benefits

Similarly, the fifth section of the Applicant's *Employee Handbook* covers the generous benefits that will be provided to employees, including:

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Notably, there are certain benefits that the Company and all employers provide as required by federal and local state laws. These benefits include social security, unemployment compensation, and workers' compensation. There are other benefits that the Company funds, either partially or fully, that are offered to an employee as part of his/her total compensation from the Company and as a benefit of employment with us. These benefits may include group medical and dental insurance, PTO, and holidays.

36.7 Section 6: Employee Health and Safety

In Section 6 of the Applicant's Employee Handbook, the Applicant covers topics pertaining to safety policies and employee health, including personnel safety and crime prevention. More specifically, Section 6 outlines the Applicant's policies for:

Employees will ensure safety first in the conduct of their work. The primary objective of this policy is employee safety and crime prevention, to eliminate personal injury, property damage, and the needless suffering and waste that usually follows workplace accidents. Every effort is taken to provide a safe place to work. The Applicant believes safety is so important to employee welfare that violation of any safety rule may result in disciplinary action, including termination of employment.

36.8 Section 7: Employee Services

The seventh section of the *Employee Handbook* summarizes the beneficial services that the Applicant will provide for its employees, including

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36.9 Section 8: Employee Development

Section 8 of the Applicant’s Employee Handbook describes the policies that Applicant will implement regarding the development of employees, including:

The Applicant recognizes the value of professional development and personal growth for employees. Therefore, professional development, which benefits the company and employee, and that is required to maintain a certification or a license or for continuing education related to an employee’s profession, is eligible for reimbursement. The policy includes memberships to professional organizations, fees for workshops, conferences, and seminars that advance professional development, and training needed to maintain or renew professional certifications or licenses.

36.10 Addendum to Employee Handbook

Lastly, the Applicant includes an addendum to its main Employee Handbook that describes employment-related benefits required under Alabama and local laws. The addendum includes policies such as:

36.11 Conclusion

Using the lessons learned from years of operating cannabis companies, the Applicant developed the attached *Employee Handbook* to ensure that the future company creates a harmonious working relationship and environment for employees. The *Employee Handbook* meticulously outlines the employment policies for the Applicant’s company, including employee benefits, pay, time off, personnel safety, and crime prevention. As you will see, the Employee Handbook far exceeds the required criteria for Exhibit 36.

<<<<< End of 5-page Summary >>>>>

Employee Handbook – Attachment to Exhibit 36, Section 36.1

Employee Handbook

Policy and Procedure Guidelines

This Employee Handbook is the property of the Applicant and it may not be reproduced without its express authorization and consent.

This Handbook supersedes and replaces any inconsistent policies or practices and replaces any past handbook. It is the intent of the Handbook to provide an overview of the Applicant's policies, and it shall not be interpreted to create any contractual rights.

January 2022

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

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SECTION 4.0 EMPLOYEES TIME OFF & PAY

4.1 Payday

Employees are paid bi-weekly with paychecks distributed every other Friday. Each paycheck is for work performed through the end of the prior two workweeks, which begin on a Monday and end on the second following Sunday.

If an employee does not have direct deposit, live paychecks are normally distributed by Human Resources or mailed or by the supervisor or coordinator for the department. If an employee does not have direct deposit and is absent on payday, his/her paycheck will be held by the Human Resources Representative absent an advance request from the employee to have their paycheck mailed to them. If the employee does not pick up his/her check the following day (e.g., if an employee is ill) the paycheck will be mailed to the employee's address on file. Paychecks will not, under any circumstances, be given to any person other than the employee without written authorization.

Alternatively, the Company offers an employee direct deposit of his/her bi-weekly paycheck into a personal checking or savings account. In the event that an employee uses this service, he/she may log into the payroll system to view a record of the paycheck that has been deposited according to his/her instructions.

If the normal payday falls on a Company-recognized holiday, paychecks will be distributed one workday before the regularly scheduled payday.

In the event of a lost paycheck, the Human Resource department must be notified in writing as soon as possible and before a replacement check can be issued. In the event the lost paycheck is recovered, and the Company identifies the endorsement as that of the employee, the employee must remit the amount of the replacement check to the Company within 24 hours of the time it is demanded.

If an employee's marital status changes or the number of exemptions previously claimed increases or decreases, a new Form W-4 must be submitted through the payroll system.

The Company makes every effort to ensure employees are paid correctly. Occasionally, however, inadvertent mistakes occur. Under such circumstances, and when called to the Company's attention, the Company will promptly make any corrections that are necessary. Employees should review their pay stub to make sure it is correct. If an employee believes a mistake has occurred (including any improper deductions, under-reported hours of work or other error) or if he or she has any questions, Human Resources should be contacted. Employees are also required to immediately report errors that result in over payment.

4.2 Overtime Pay

While the Company tries to provide steady 40-hour workweeks, there are times when customer demand dictates heavy production schedules. When non-exempt employees work more than 40 hours in a workweek, the Company recognize the employee's extra effort with premium pay per the following schedule:

- 1.5 times base pay for all hours worked in excess of 40 hours in a week unless state law requires otherwise;

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1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
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Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
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Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 37 - Secure Transport Driver

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.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

37.1 Introduction

The Applicant's team currently consists of two Secured Transport Drivers,

As part of (or in addition to) the medical cannabis education and safety training applicable to all employees of licensees generally, transport personnel employed by a secured transporter shall annually complete and receive certification for no less than five (5) hours of training specifically tailored to driver safety and procedures related to the proper procedures to be followed when transporting cannabis and medical cannabis, pursuant to **Rule 538-x-7-.05**.

Attached below you will find a completed FORM H: SECURE TRANSPORT DRIVERS, for each of the Applicant's Secure Transportation Drivers. For each individual, the form includes the Secured Transport Driver's: (1) driver's license number; (2) social security number, if available; (3) verification that the secure transport driver is at least 21 years of age; (4) verification that the secure transport driver has a minimum of three years driver in the last three years; and (5) a list of any motor vehicle citations, fines, or violations received by the driver in the last three years (if applicable). Both Secured Transport Drivers have active CDL licenses.

As the Applicant's company grows, the Applicant will hire more Secure Transport Drivers to meet the demands of the market.

FORM H: SECURE TRANSPORT DRIVERS

Complete a separate form and verification for each of the Applicant's secure transport drivers.

Verano Alabama, LLC Integrated Facility
 Business License Applicant Name License Type

Issued by (State) Number Issue Date Expiration Date

Citations, Fines & Violations

List all motor vehicle citations, fines, and violations received by the driver in the last three (3) years. Attach additional forms if necessary.

Type (select all that apply): Citation Fine Violation

None

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

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Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

Disposition/Amount Date of Disposition

Applicant Verification: The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes complete and accurate information for the secure transport driver identified hereinabove (and attached, as necessary). The undersigned further verifies that the secure transport driver identified hereinabove is at least 21 years of age and has a minimum of three (3) years driving experience.

Secure Transport Driver

Title of Verifying Individual

11/14/22

Verification Date

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

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Title of Verifying Individual

12.22.2022

Verification Date

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Exhibit 38 – Driver’s 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

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within the fleet, including secure storage areas, temperature & moisture controls, cameras, drop safe, ballistic glass, and DVR system. Cannabis storage protocols comply with the requirements and restrictions of §20-2A-65 and Chapters 3, 7, and 10. Secure and temperature-controlled transport vehicles will not bear markings or other indications of carrying cannabis or medical cannabis. **Containers** - All cannabis and medical cannabis will be transported inside temperature-controlled sealed tamper-evident containers that cannot be accessed while in transit. These containers will fit inside the secure lockbox area and prevent visibility or recognition outside the secure transport vehicle. Containers are resistant to sunlight, temperature extremes, impact, moisture, while preventing decay while absorbing odors. Constructed from FDA-approved polymers, containers are food-safe, and UV-resistant, with smooth-wall interiors allowing for ease of sanitation. **Vehicle Security Equipment** - Variable route plans and GPS tracking systems are monitored using Wi-Fi or hardline network technology from the secure transporter's security center. Each vehicle will be equipped with an EyeElitet GPS device. Vehicle dashboard and storage area audio/video recording devices (self-recording and, always possible, viewable from and saved directly to the secure transporter's security center) will be installed and operational at all times while the vehicle is in transit. Smart locks and Compustar Alarm Systems are installed on all vehicles and equipped with integrated access control modules and reinforced door hinges. Secure Transport drivers will have ready access to duress panic and hold-up alarms activated in the event of an attempted diversion by unauthorized personnel, hijackers, terrorists, or other improper intervenors. Eyeride™ 4-point cameras are installed in all vehicles and equipped with wide-angle lenses capturing faces and activity in and near the vehicle. **Vehicle Emergency Equipment Kit** - All STVs will be equipped with a spare tire and an emergency kit and roadside safety kit, including a first aid kit, car battery, fire extinguisher, flares, fuses, an emergency escape tool, one spare tire, reflective triangles, a car jack, tire/lug wrenches, coolant, water, jumper cables, tire chains, and reflective vests. **Insurance** - The Applicant will require that all STVs will have current state inspection and registration stickers and be insured in the amount of at least \$1,000,000 per incident, or an amount that is commercially reasonable whichever is higher. Each STV will be bonded with a \$10-million insurance policy that covers cash and products. **Vehicle Inspections and Maintenance** - STVs will undergo monthly maintenance inspections by a vetted mechanic

to ensure they remain in sound working condition. At a minimum of every twelve months, we will have a qualified commercial vehicle inspector conduct a comprehensive inspection of all STVs used by the Applicant to transport cannabis and/or medical cannabis. **Vehicle Cleaning and Sanitation** - Agent training will include instruction on how to clean and sanitize the interior and exterior of STVs after every use. **Secure Transporter Standards and Procedures** -

Tracking of Cannabis and/or Medical Cannabis During Transportation -

be used to track all cannabis and/or medical cannabis before and during the transport or transfer from the Applicant's facility. This system will also verify and document the weight of any products and the number of products. The Applicant will create printed and electronic transportation manifest for every transport and delivery of cannabis and/or medical cannabis and will retain a copy of the transportation manifest for at least five years.

. Upon request, the Applicant will immediately provide the transportation manifest to the Commission and the Alabama Bureau of Investigation for review. Additionally, the Applicant will supply the Commission and the Alabama Bureau of Investigation with meticulous records of daily transport schedules, routines, and delivery times.

<<<< End of 5 Page Summary >>>>

38.2 Secure Transporter Personnel Positions and Qualifications

All transportation employees, including Secure Transport Drivers, fall under the Applicant's transportation department and will report to the Applicant's Transportation Director. The Transportation Director will work closely with the Chief Compliance Officer (CCO) to ensure all regulatory standards are being met. The CCO will work with the Transportation Director to craft knowledge check tests to ensure all transportation staff maintain a thorough understanding of applicable Alabama cannabis and traffic regulations pursuant to Chapter 7 regulations. Prior to transport the Applicant will provide verification of compliance with Alabama Public Service Commission requirements for motor carriers pursuant to **Rule 538-x-7-.03-2.c.(3)**.

38.2.1 Transportation Director

The **Transportation Director** reports to the Chief Operating Officer (COO) and manages, directs, and executes the transportation program, including manifest creation, tracking systems, and staffing.

Duties include the management of all logistics of product transport, vehicle insurance, CDL compliance, Secure Transport Drivers, third-party Secure Transporters, security of transports, and all product in transport. It will be the duty of the Transportation Director to train all Transportation Agents on compliant operations, monitor Transportation Agents activity to ensure regulations are consistently followed, conduct performance reviews, oversee maintenance of all Secure Transport Vehicles (STVs), logically route each transportation of cannabis and/or medical cannabis, review all pre-trip inspections documents and trip logs, and maintain record of all cannabis and/or medical cannabis deliveries to make readily available for the Commission.

38.1.1.1 Transportation Director | Qualifications

Drivers must be at least 21 years of age and at least five-plus years in cannabis transport operations, pursuant to **Rule 538-x-7-.03-2.c.(6)**, and a bachelor's degree or higher in logistics or related field are required with an active CDL license. In compliance with **Rule 538-x-7-.03-2.c.(1)**., provide Verified Written Consent to a state and national criminal background check shall also be obtained for each of the Secure Transporter Applicant's proposed drivers; upon request, all Secure Transporter Applicants and their employees must submit an ALEA Application to Review Alabama Criminal History Record Information (SBI Form 46). In compliance with **Rule 538-x-7-.03-2.c.(2)**., provide verification that they have not received a criminal conviction within the last eight years for:

- (a) Any indictable offense.
 - (b) Any offense involving stolen property or vehicles; fraud relating to any business the driver has owned, in whole or part, or in which the driver has been employed; stolen property; or other offense of similar nature.
 - (c) Operation of a motor vehicle while under the influence of a controlled substance, or offense of similar nature.
 - (d) Any offense involving possession, distribution or trafficking in, any illegal substance.
- A license shall not be awarded to any Secure Transporter Applicant not in compliance with this provision.

38.2.2 Transportation Agents | Drivers and Prospective Drivers

Secure Transport Drivers report to the Transportation Director and are responsible for safely delivering products, cash, and valuables to and from production facilities and dispensaries.

It will be the duty of the Transportation Agent to maintain a complete understanding of all applicable state regulations for transporting cannabis and/or medical cannabis under the Act. Transportation Agents will be responsible for securing compliant delivery of cannabis and/or medical cannabis to licensed dispensing facilities and approved laboratories in the State of Alabama. Duties include compliance with **Chapter 7**, enforcement of rules to protect the shipment of cannabis, products, and cash, as well as the safety of personnel involved in the transportation, freight, and receiving of high-value assets. These individuals will be thoroughly trained and will be required to present a certified driving record prior to hire. Only individuals with an outstanding record will qualify for this role. These associates will be asked to perform daily inspections on STVs, maintain accurate trip logs for each delivery, display competency in all implemented routing and tracking software, compliantly Transportation and deliver cannabis and/or medical cannabis, deliver all transportation documentation to the Transportation Director, and clean and sanitize STVs after each use. Provide verification that they have not received a criminal conviction within the last eight years for:

- (a) Any indictable offense.
 - (b) Any offense involving stolen property or vehicles; fraud relating to any business the driver has owned, in whole or part, or in which the driver has been employed; stolen property; or other offense of similar nature.
 - (c) Operation of a motor vehicle while under the influence of a controlled substance, or offense of similar nature.
 - (d) Any offense involving possession, distribution or trafficking in, any illegal substance.
- A license shall not be awarded to any Secure Transporter Applicant not in compliance with this provision.

38.1.1.1 Duties and Restrictions

Secure Transporters are required to be licensed. It shall be the duty of a Secure Transporter, pursuant to **Rule 538-x-7-.02-3.:**

1. To transport cannabis and medical cannabis, in a safe, efficient, and professional manner from and to licensees' facilities, pursuant to such contracts as the Secure Transporter may negotiate between itself and one or more licensees.
2. To log details regarding the product and the transport in the Statewide Seed-To-Sale Tracking System and/or the manifest relating to said transport.
3. During transit, to maintain cannabis and medical cannabis:
 - a. in accordance with an approved security plan
 - b. in a moisture- and temperature-controlled environment acceptable to the contracting licensee, to avoid deterioration or loss of efficacy of the cargo.
4. A Secure Transporter must not:
 - a. Cultivate, process or dispense cannabis.
 - b. Perform the functions of a State Testing Laboratory.
 - c. Make home delivery of cannabis or medical cannabis to anyone.
 - d. Transport patients or caregivers to or from dispensing sites or any other licensees' facilities.
 - e. Transport any cargo except cannabis, medical cannabis and associated products, materials, packages or containers.

38.1.1.1 Transportation Agents | Qualifications

Driver must to 21 years of age and at least five-plus years in cannabis transport operations, pursuant to **Rule 538-x-7-.03-2.c.(6)**, and a bachelor's degree or higher in logistics or related field are required with an active CDL license. In compliance with **Rule 538-x-7-.03-2.c.(1)**., provide Verified Written Consent to a state and national criminal background check shall also be obtained for each of the Secure Transporter Applicant's proposed drivers; upon request, all Secure Transporter Applicants and their employees must submit an ALEA Application to Review Alabama Criminal History Record Information (SBI Form 46). In

compliance with **Rule 538-x-7-.03-2.c.(2)**., provide verification that they have not received a criminal conviction within the last eight years for:

- (e) Any indictable offense.
 - (f) Any offense involving stolen property or vehicles; fraud relating to any business the driver has owned, in whole or part, or in which the driver has been employed; stolen property; or other offense of similar nature.
 - (g) Operation of a motor vehicle while under the influence of a controlled substance, or offense of similar nature.
 - (h) Any offense involving possession, distribution or trafficking in, any illegal substance.
- A license shall not be awarded to any Secure Transporter Applicant not in compliance with this provision.

38.3 Secure Transport Drivers Personnel Training

Secure Transport Drivers shall be trained in and have ready access to secure procedures for undergoing administrative inspection by law enforcement pursuant to **§ 20-2A-65(c)**, Code of Alabama 1975 (as amended).

All Transportation Agents will be required to complete procedural and emergency training related to the transport of cannabis and/or medical cannabis. As part of the Applicant's training program for Transportation Agents, the following will occur:

The Applicant's Director of HR and COO will train staff on company policies and applicable laws. The Transportation Director will train staff on transportation-specific SOPs, including safe driving and security procedures. The Applicant's Director of HR will develop and oversee our training curriculum, in consultation with on-staff leadership and any necessary contractors, and will maintain copies of all training materials on-site, including staff attendance, the Employee Handbook, and copies of any written materials used in training, as well as off-site backups. The Applicant's Director of HR, COO, CCO, and Transportation Director will work collaboratively to update company policies and SOPs pursuant to changes in applicable state and local laws, to retrain employees on changes, and to provide continuing education programs to promote a culture of continually exceeding requirements.

The Applicant has divided the agent training timeline into two training categories: onboarding and continuing education. To best maintain compliance with all statutory and regulatory requirements, the Applicant's implemented onboarding training will be comprehensive, lengthy, and include multiple modalities (e.g., written, online, in-person, and job shadowing). Onboarding will last several weeks, designated as from the time of hire through to first assignment.

Agents will spend a mix of time in different learning environments during their onboarding, such as: doing online learning and studying in a self-guided manner; classroom instruction led by senior employees; shadowing senior agents in the new hire's role; and doing tasks with the oversight of a more senior agent.

Once agents have completed onboarding, they will complete regularly scheduled continuing education and refresher training. These trainings will continue if an agent works for the Applicant. The Applicant has budgeted specifically to support continuing education efforts on the part of agents, allowing them the opportunity to attend conferences, exhibits, and professional development courses. Management will conduct mandatory retraining in response to changes in regulations, operational procedures, or other major updates.

Agents will complete training on topics to include:

Agents will be given agent training materials as well as provide classroom instruction on these topics. New hires will need to pass testing before beginning work. Those who do not pass will receive additional training and subsequent retesting. Shadowing will occur as well as part of training, first with new hires watching senior employees, followed finally the new hire performing tasks with the oversight of a senior agent.

38.3.1 Diversion During Transportation Training

Agents onboarding training will include instruction on the Applicant's policies regarding diversion and theft prevention, including our zero-tolerance policy toward diversion or theft. The Employee Handbook will detail these policies, and we will require all agents to read and sign the handbook to confirm their understanding of, and agreement to, all diversion prevention policies. Agents must read and sign the handbook and complete all diversion prevention training prior to beginning work. Agents will learn that audio/video surveillance is everywhere and that the Statewide Seed-to-Sale Tracking System and other software record agents' activities in unalterable logs.

38.3.2 Medical Cannabis Education and Safety Training Requirements for Employees

In compliance with **Rule 538-x-7-.05**, in addition to the medical cannabis education and safety training applicable to all employees of licensees generally, transport personnel (i.e., drivers and any other employees whose job is to accompany drivers) employed by a secured transporter shall annually complete and receive certification for no less than five (5) hours of training specifically tailored to driver safety and procedures related to the proper procedures to be followed when transporting cannabis and medical cannabis.

38.4 Secure Transporter Compliance

The Applicant's will 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), shall specifically extend to all secure transport vehicles; a license shall not be awarded to any Secure Transporter Applicant who fails to provide the requisite consent, pursuant to **Rule 538-x-7-.03-2.c.(7)**. Facilities will conform with Rule 3 of Chapter 3 of these Rules, pursuant to **Rule 538-x-7-.03-2.c.(8)(a)**. The Secure Applicant verifies that it has no economic interest in any other license or Applicant for license under the Act or Chapter 7, pursuant to **Rule 538-x-7-.03-2.c.(8)(b)**.

38.4.1 Security Plan Compliance

In compliance with **Rule 538-x-7-.03-2.c.(8)(e)**, the Secure Transporter's Security Plan includes a verified plan for security during transport of medical cannabis, including but not limited to the following:

- xv. Route plans, manifests, transport logs, freight bills, bills of lading and any free-on-board (“FOB”) terms of sale documents, maintenance and repair records, and insurance documentation must be kept (either manually or electronically, including, but not limited to, as part of the Statewide Seed-to-Sale Tracking System), as to all vehicles in the secure transporter’s fleet, for a period of not less than two (2) years, and longer upon the request of the Commission or law enforcement. Such documents shall be made available to the Commission or its representatives (including inspectors) during inspections and other official visits.
- xvi. Upon request, a secure transporter shall make available to the Commission or its inspectors all information relating to the security plan.
- xvii. (f) The Secure Transporter Applicant must provide an affidavit signed by the responsible individual and designated contact person (or, if the Secure Transporter is an entity, the duly authorized officer, owner or interest holder and the designated contact person) that the information provided in the Application is true and correct, to the best of the Affiants’ knowledge upon a diligent investigation thereof.
- xviii. (g) The Secure Transporter Applicant must provide an Application Fee pursuant to § 20-2A-55(f), Code of Alabama 1975 (as amended). The Applicant’s nonrefundable Application Fee must be submitted electronically per instructions

in the Application Form received in response to the applicant's Request for Application.

38.4.2 Inspection Compliance

Pursuant to **Rule 538-x-7-.04**, in addition to the general inspections for licensee facilities to be carried out by the Commission in accordance with § 20-2A-52(a)(3), Code of Alabama 1975 (as amended), a secure transporter licensee shall be subject to inspection of all secure transport vehicles, under the same terms and on the same basis as for licensees' facilities generally.

a. **Pre-Commencement Inspection.** When a licensee is set to commence operations at any facility, the licensee shall contact the Commission to set a date for inspection of all facilities and secure transport vehicles under the procedures for a pre-commencement inspection set forth under the procedures outlined in Chapter 4, including that the pre-commencement inspection may be set at any mutually acceptable time. No Secure Transporter's operations may commence at any facility or with respect to any secure transport vehicle until the facility and all secure transport vehicles have passed a pre-commencement inspection with no critical violations and all minor infractions having been corrected. Reinspection following a failed pre-commencement inspection shall occur within 30 days, after which, if the Secure Transporter passes the inspection, it may commence operations. A Secure Transporter which has failed a second pre-commencement inspection must petition the Commission for permission for a further pre-commencement inspection; if the Commission denies a third pre-commencement inspection or the Secure Transporter fails the third inspection, the Secure Transporter is precluded from commencing operations and its license shall be revoked.

2. **Announced Inspections of Secure Transporter Facilities and Vehicles.** Not less than 14 days prior to any announced inspection, the Commission, acting by and through its representative, will notify the secure transporter licensee of its intention to conduct an announced inspection of the licensee's facilities, vehicles, operations, and documentation, advising the licensee of a specific date and time for the inspector's anticipated arrival as well as the individuals who are anticipated to be part of the inspection team. At the time of the

announced inspection, secure transporter licensees shall make their facilities, vehicles, personnel, operations, and documentation available for review and auditing at the request of the inspector. In addition to the aspects of inspection listed in Chapter 4 of these Rules, aspects of the inspection of secure transporters shall include, but are not limited to: maintenance and repair logs, transport documentation, PSC licensing and compliance, and insurance records of all vehicles that have been in operation at any time since the last announced inspection; all vehicles not yet acquired or placed into operation that the secured transporter is planning to obtain and/or place in operation at any time during the next two years; motor vehicle citations, penalties, and violations in the last three (3) years; all operations and transports being conducted by the secured transporter, including but not limited to, all machinery, vehicles, equipment and supplies; all security monitoring records, records of route plans, and incident reports related to any vehicle, transport or driver; background check certificates and/or personnel files of all owners, officers, administrators, managers, transport personnel or other employees (full-time or part-time), and volunteers.

3. Unannounced Inspections of Secure Transporter Facilities and Vehicles. Unannounced Inspections may be conducted without prior notice at any time, without respect to whether the secure transporter has or has not undergone an announced inspection, on the same basis as licensees generally, in accordance with the provisions for such inspections contained in Part IV. Unannounced inspections for secure transporters include, but are not limited to, the category of “administrative inspection” that may be conducted by law enforcement on a secure transporter’s vehicle at any time. At the time of licensing, Secure Transporters shall receive information regarding specific procedures that shall be employed to ensure the safety of transport personnel and their cargo when law enforcement officers, acting upon the request of the Commission or otherwise, seek to perform an administrative inspection of a secure transport vehicle.

38.4.3 Technology Compliance

Pursuant to **Rule 538-x-7-.06**, in addition to the technology requirements for all licensees generally, Secure Transporters must also do the following: 1. Prior to transport, Secure Transporters must enter into the Statewide Seed-to-Sale Tracking System the route plans

and manifests (containing information as set forth in Rule 538-x-7-.07) of any vehicle transporting cannabis or medical cannabis. 2. Secure Transporters must maintain GPS tracking technology to monitor and record transportation of cannabis and medical cannabis by its vehicles using Wi-Fi or hardline networking technology.

38.4.4 Marketing and Advertising Compliance

Pursuant to **Rule 538-x-7-.08**, regulations for advertising and marketing by Secure Transporters shall be the same as for licensees generally. Specifically in addition thereto, Secure Transporters' vehicles may bear the logo or name of the Secure Transporter, but they must not bear markings or other indication that they carry cannabis or medical cannabis.

38.5 Secured Transportation Vehicle (STV) Detail

The Applicant purchased and insured a 2016 Ford Transit secure transport vehicle in Alabama specifically for this project. A copy of the vehicle lease demonstrates possessory interest in the vehicle intended for secure transportation of cannabis and medical cannabis. The vehicle will sit idle while the Commission evaluates the Applicants. Copies of insurance declaration pages include a detailed list of all 158 vehicles covered under the policy. The license plate number resides in the last section, and due to the fact the 2016 Ford Transit has a Gross Vehicle Weight Rating of 5,270 pounds, a DOT registration and number are not required. The Applicant has explained why the vehicle is exempt from obtaining a DOT number in Alabama. To meet and exceed the Commission expectations of potential Licensees, the Applicant has gone above and beyond to demonstrate financial and operational wherewithal.

Prior to using any vehicle for transportation of cannabis and/or medical cannabis, the Applicant will submit the details of the vehicle (including make, year, model, license plate number, vehicle identification number, and proof of insurance) to the Commission. Each vehicle will be equipped with a "Compliance Binder" that will contain copies of all our state-issued cannabis license documentation as proof to law enforcement of our authorization to secure transport cannabis and medical cannabis. The Applicant's transportation agents will make these documents available to the Commission and state or local law enforcement at

any time, including during scheduled or random inspections or during any law enforcement stops of the vehicle.

38.5.1 Cannabis Storage Specifications

A diagram of the vehicle interior indicates the major alterations made for all cannabis transport vehicles within the fleet,

38.5.2 Cannabis Storage Protocols

Cannabis storage protocols comply with the requirements and restrictions of **§20-2A-65** and **Chapters 3, 7, and 10**. Secure and temperature-controlled transport vehicles will not bear markings or other indications of carrying cannabis or medical cannabis.

The Applicant currently operates **158** cannabis transport vehicles in thirteen states. Each vehicle complies with insurance, security, and compliance standards in the most stringent of cannabis markets. The Applicant will far exceed the requirements of **§20-2A-65** and Chapters 3, 7, and 10 and implement meticulous security protocols perfected over the last decade of cannabis transport.

38.5.3 Vehicle Communication Systems

38.5.4 Vehicle Emergency Equipment Kit

All STVs will be equipped with a spare tire and an emergency kit and roadside safety kit, including a first aid kit, car battery, fire extinguisher, flares, fuses, an emergency escape tool, one spare tire, reflective triangles, a car jack, tire/lug wrenches, coolant, water, jumper cables, tire chains, and reflective vests. Before undertaking any transportation duties, agents will complete training on the use of the kit and the supplies contained therein, including when it is or is not permissible to use the supplies. A weekly inventory check will be conducted by the Transportation Agents to ensure that each piece of emergency equipment is present and that it is operational. An inventory report will be provided to the Transportation Director for record along with any information regarding equipment that needs to be replaced. Emergency contact sheets will be stored in the glove department of each STV.

38.5.5 Vehicle Insurance

The Applicant will require that all STVs will have current state inspection and registration stickers and be insured in the amount of at least \$1,000,000 per incident, or an amount that is commercially reasonable whichever is higher. Each STV will be bonded with a \$10-million insurance policy that covers cash and products.

38.5.6 Vehicle Inspections and Maintenance

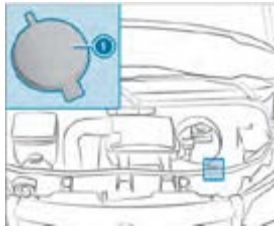
STVs will undergo monthly maintenance inspections by a vetted mechanic to ensure they remain in sound working condition. At a minimum of every twelve months, we will have a qualified commercial vehicle inspector conduct a comprehensive inspection of all STVs used by the Applicant to transport cannabis and/or medical cannabis. Additionally, the Applicant will contract to have comprehensive service and inspections performed at regular intervals (e.g., a certain mileage or amount of time) pursuant to manufacturer recommendations. These inspections will include preventative maintenance procedures such as oil and fluid changes, lubrication, horn checks, mirror checks, brake (and emergency brake) checks, tire inspections, and detailed inspections of other components. Anytime that potential vehicular problems are identified by one of the Applicant's agents, a mechanic, or an inspector, we will

immediately record the issue on the STV's maintenance log, which will be retained by the Transportation Director for five years, or if the STV remains owned by the Applicant, whichever is longer.

The Applicant's maintenance of vehicles falls into two categories: Preventative Maintenance and Demand maintenance. The preventive maintenance program will help the Applicant anticipate issues before they occur. Demand maintenance is the type of maintenance that the Applicant will perform only when there is a need for it, such as replacing or fixing certain vehicle parts only when they break down and stop working properly. The Applicant has developed and will use paper-based and electronic checklist forms to ensure vehicle maintenance is up to date and the reliable functioning of the vehicle. The maintenance checklists include the manufacturer's recommendations on vehicle maintenance, the approximate time when persons responsible should perform it, and more. The items on preventive maintenance checklist include: (1) Oil changes; (2) Filter changes; (3) Components tightening; (4) Tuning of the engine; (5) Brake fixing; (6) Tire rotation; (7) Lubrication; and (8) Radiator maintenance. Demand maintenance checklists will include items such as: (1) Replacing light bulbs; (2) Replacing springs; (3) Putting new window glass; (4) Retuning gauges; (5) Placing new window glasses; (6) Replacing seat cushions; (7) New engine and transmission; (8) New batteries; and (9) Replacing corroded or deteriorated structures. Vehicles will undergo monthly maintenance inspections by a vetted, certified Ford mechanic to ensure they remain in sound working condition. Additionally, the Applicant will contract to have comprehensive service and inspections performed at regular intervals pursuant to manufacturer's recommendations. The Applicant's vehicles will have an ASSYST PLUS service interval display on the instrument display that provides information on the remaining time or distance before the next service due date. The prescribed service interval is based on normal vehicle use. The Applicant will perform maintenance work more often than prescribed if the vehicle is operated under arduous conditions or increased loads.

The Applicant will use a certified Ford auto technician for all maintenance purposes. However, under circumstances that the Applicant is not able to have a professional conduct the vehicle maintenance, the Applicant will conduct maintenance following the procedures below. **Engine Oil** - The applicant will check the engine oil level using the on-board

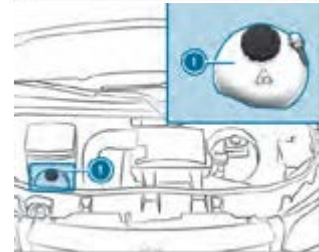
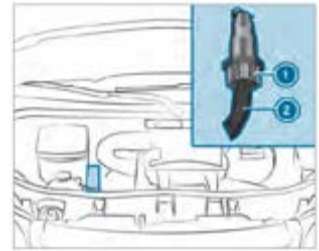
computer, or if necessary, oil dip stick. If the vehicle indicates that adding oil is required, the Applicant will conduct the following: (a) Turn cap [1] counter-clockwise and remove it; (b) Add engine oil; (c) Replace cap [1] and turn it clockwise until it engages; and (c) Check the oil level again using the on-board computer. **Coolant level** - The Applicant will allow the engine and the engine cooling system to cool down before checking the coolant level or refilling coolant. When checking coolant level, the Applicant will: (a) Park the vehicle on an even surface and open the hood; (b) Slowly turn coolant expansion reservoir cap half a turn counter-clockwise and allow excess pressure to escape; (c) Turn coolant expansion reservoir cap [1] further and remove it; and (d) Check the coolant level. If the Applicant determines that adding coolant is required, the Applicant will: (a) Refill the approved coolant to the MAX mark on the coolant expansion reservoir; (b) Replace coolant expansion reservoir cap [1] and tighten in a clockwise direction; (c) Start the engine; (d) After approximately five minutes, switch off the engine again and allow it to cool down; and (e) Check the coolant level again and add coolant if necessary. **Adding Washer Fluid** - When adding washer fluid, the Applicant will: (a) Pre-mix the washer fluid in the correct mixing ratio in a container; (b) Park the vehicle on a level surface and secure it against rolling away; (c) Open the hood; (d) Pull the cap of the washer fluid container [1] upwards by the tab; (e) Pour in the pre-mixed washer fluid; (f) Press cap [1] onto the filler opening until it audibly engages; and (g) Close the hood. **Cleaning the water drain valve of the air intake box** - When cleaning the water drain valve of the air intake box, the Applicant will: (a) Open the hood; (b) Remove dirt from water drain valve of air intake box. **Draining the Fuel Filter** - When the fuel filter requires draining, the Applicant will: (a) Park the vehicle in a safe location and secure it against rolling away; (b) Switch off the auxiliary heating; (c) Switch off the engine; (d) Open the hood; (e) Place a suitable collecting pan beneath drain hose [2]; (f) Switch on the ignition; (g) Open drain screw [1] until the water/fuel mixture emerges from drain hose [2]; (h) Close drain screw [1] as soon as around 0.2 qt (0.2 liter) of the water/fuel mixture has been collected. After 30 seconds, the electrical fuel pump automatically stops the discharge of the water/fuel mixture; (i) After draining, switch off the ignition; (j) Dispose of the collected water/fuel mixture in an environmentally responsible manner, e.g. at a qualified specialist workshop; (k) Check that drain screw [1] has been closed.; and (l) Close the hood. **Tires** – Tires will be replaced based on the manufacturer’s recommendation. Tire Pressure shall be checked prior



to each transport. However, as mentioned earlier, the Applicant will always opt to have these processes conducted by a certified auto technician, unless otherwise not able to. The Applicant will maintain all records of vehicle maintenance for at least five years, and such records will be available for review by the Commission upon request.

Van Contents include: roadside assistance kit, universal phone mount and phone charger, tire gauge, battery jumpstart, spare tire and jack, fire extinguisher, insurance card, vehicle

registration, transporter certificate, four-way lug wrench, tire inflator, flashlight, dolly, product return logs w/ clipboard, pens, box cutter, hand sanitizer, dash cleaning wipes and glass cleaning wipes.



38.5.7 Vehicle Cleaning and Sanitation

Agent training will include instruction on how to clean and sanitize the interior and exterior of STVs after every use. This training will include scrubbing down the entire area to prevent accumulation of dust, debris, pests, or other potential sources of contamination. Agents will perform cleanings of the storage area as well. Appropriate PPE and SOPs will be stored in an easily accessible area for these cleanings. The Applicant will also arrange for professional interior and exterior cleanings of all STVs on a regular basis and only at times when the vehicles are not carrying any cannabis and/or medical cannabis.

On a weekly basis (or as needed), the Applicant's employees will clean and sanitize the interior and exterior of vehicles using cleaning and care products recommended by Ford, with a preference toward organic and eco-friendly products. Additionally, the Applicant will have a professional clean the interior/exterior of the vehicles monthly (only when the vehicles do not carry any cannabis or medical cannabis).

38.1.1.1 Exterior Vehicle Care

Below is a meticulous account of the procedures the Applicant will follow to care for exterior vehicle parts on a weekly basis, including notes on preventing damage. **Washing Vehicle by Hand** - When washing the vehicles by hand, the Applicant will use a specially designated wash bay at its facility. Within the designated area of its facility, the Applicant will comply with the following procedure: (1) Use a mild cleaning agent, e.g. car shampoo; (2) Wash the vehicle with lukewarm water and a soft car sponge. When doing so, do not expose the vehicle to direct sunlight; (3) Carefully spray the vehicle with water and dry off with a leather cloth. Be careful not to point the water jet directly towards the air inlet grilles. The blower should be switched off while doing so; and (4) Do not let the cleaning agent dry on the paintwork. At the onset of winter, the Applicant will remove all traces of road salt deposits carefully and as soon as possible. **Wheels/rims** - Use water and acid-free wheel cleaner. Do not use acidic wheel cleaners to remove brake dust. To avoid corrosion of brake discs and brake pads, drive for a few minutes after cleaning before parking the vehicle. **Windows** - Clean windows inside and outside with a damp cloth and with a cleaning agent recommended by Ford. Do not use dry cloths or abrasive or solvent-based cleaning agents to clean the inside of windows. **Wiper Blades** - Carefully clean the folded-away wiper blades with a damp cloth. Do not clean the wiper blades too often. **Exterior Lighting** - Clean the lenses with a wet sponge and mild cleaning agent, e.g. car shampoo. Only use cleaning agents or cloths suitable for plastic lenses. **Sensors** - Clean the sensors in the front and rear bumper and in the radiator grill with a soft cloth and car shampoo. **Rear view camera and 360° Camera** - Remove traces of rust on the ball, e.g. with a wire brush. Remove dirt with a lint-free cloth. After cleaning, lightly oil or grease the ball head. Do not clean the ball neck with a power washer or solvent. **Sliding door** - Remove foreign objects from the vicinity of the contact plates and contact pins of the sliding door. Clean the contact plates and contact pins with a mild cleaning agent and a soft cloth. Do not oil or grease the contact plates and the contact pins. **Steps** - Clean the electrically operated steps and their housing with a power washer. After cleaning, spray the lateral guides with silicone spray. Clean the steps in the bumper with a power washer. Do not use oil or grease as a lubricant. **Aluminum Dropsides** - Brush down the aluminum dropsides

with water and a neutral or mild alkaline cleaning agent. Do not use abrasive cleaning agents to clean the dropsides.

38.1.1.1 Interior Vehicle Care

The Applicant will take the following steps when caring for and sanitizing the vehicle's interior on a weekly basis: (1) Remove the Trash; (2) Vacuum the Interior; (3) Clean the Seats; (4) Identify and Remove Stains; (5) Clean the Dashboard; (6) Wash the Truck Ceiling; (7) Wash the Storage Compartments; (8) Wash the Steering Wheel and Gear Shifter; (9) Clean the Floor Mats; (10) Clean the Door Panels; and (11) Clean the Glass. When caring for specific parts of the vehicle's interior, the Applicant will follow the procedures below. **Seat belts** - Clean with lukewarm soapy water. Do not use chemical cleaning agents. Do not dry the seat belt by heating above 176°F or in direct sun-light. **Display** - Clean the surface carefully with a micro-fiber cloth and LC/TFT display care product. Switch off the display and let it cooldown. Do not use any other agents. **Plastic trim** - Clean with a damp microfiber cloth. Do not affix stickers, films or similar. **Real wood and trim elements** - Clean with a microfiber cloth. Do not use solvent-based cleaning agents, polishes, or waxes. **Headliner** - Clean with a soft brush or dry shampoo. **Cloth Seat covers** - Vacuum up dirt such as crumbs or dust and then use a damp microfiber cloth and a 1% soapsuds solution to clean the entire seat cover. Do not spot-clean. Do not use any oil-based cleaning and care products. **Steering wheel and gear or selected lever** - Clean with a damp cloth. **Pedals and floor mats** - Clean with a damp cloth. Do not use any cleaning and care products. **Vehicle Interior** - Clean with a damp cloth. Do not use a power washer. Allow the vehicle interior to dry completely after cleaning. Do not allow liquids to penetrate **Curtains** - The curtains may only be dry cleaned. Do not wash the curtains.

38.5.8 Secure Transporter Standards and Procedures

38.6 Tracking of Cannabis and/or Medical Cannabis During Transportation

be used to track all cannabis and/or medical cannabis before and during the transport or transfer from the Applicant's facility. This system will also verify and document the weight of any products and the number of products. The Applicant will create printed and electronic transportation manifest for every transport and delivery of cannabis and/or medical cannabis and will retain a copy of the transportation manifest for at least five years.

will keep all manifest records. Upon request, the Applicant will immediately provide the transportation manifest to the Commission and the Alabama Bureau of Investigation for review. Additionally, the Applicant will supply the Commission and the Alabama Bureau of Investigation with meticulous records of daily transport schedules, routines, and delivery times.

Route plans, manifests, transport logs, freight bills, bills of lading, and any free-on-board ("FOB") terms of sale documents, along with maintenance and repair records and insurance documentation must be kept (either manually or electronically, including, but not limited to, as part of the Statewide Seed-to-Sale Tracking System) as to all vehicles in the secure transporter's fleet for a period of not less than two (2) years, and longer upon the request of the Commission or law enforcement. Such documents shall be made available to the

Commission or its representatives (including inspectors) during inspections and other official visits.

The following section will detail how the chain of custody will be maintained as the cannabis and/or medical cannabis moves from within the Applicant's facility to a licensed dispensing facility or approved laboratory by securing the four main phases of a successful transport: the preparation for the transport phase, the collection phase, the transportation phase, and the delivery phase.

38.7 Preparation for Transport Phase

38.7.1 Transport Manifest Creation

Manifests will be reviewed by the Transportation Director daily to ensure compliance to all procedures. These documents will be kept on record and will be made available to law enforcement upon request.

Transportation Agents will also save copies of the manifest plan for each delivery and are required to report and document every stop, such as stopping to refuel . All transportation manifests will require a signature which will be scanned for filing and record retention.

The chain of custody is transferred from the facility to the Transportation Agent upon signing the transportation manifest. The manifest will then accompany the delivery and requires a receiving signature before the final exchange. When the Transportation Agents deliver cannabis and/or medical cannabis to multiple locations or approved laboratories, the transport manifest will correctly reflect the specific cannabis and/or medical cannabis in transit. The Applicant will provide a copy of the transport manifest to the recipient receiving the cannabis and/or medical cannabis described in the transport manifest. To maintain confidentiality, the Applicant will prepare separate manifests for each recipient. Each recipient must provide Verano with a printed receipt for the product received.

If requested, the Applicant will provide a copy of the printed transport manifest, and any printed receipts for cannabis and/or medical cannabis being transported, to the Commission or the Alabama Bureau of Investigation. The Applicant will have this information readily available for review at any moment.

38.7.2 Transportation Route Plan

38.8 Route Plan Logistics

38.9 Actual Route Plans

The Applicant's secure transport processes will operate from the Integrated Facility located at 72 Lane Dr, Luverne, AL 36049. All route plans found below are based on secure transport drivers starting at the Integrated Facility. The route plans, pursuant to **Rule 538-x-7-.03-2.c.(8)(d)**., found below will be an example of the route plan that will be found on a transport manifest. If there are multiple stops on a secure transport driver's route, the route will continue from the driver's previous stop as shown in the *figure 4* below.

38.9.1 Route Plan to Dispensing Site at 2695 S. Oates, Dothan, AL 36301

**38.9.2 Route Plan to Dispensing Site at 5113 Messer Airport Hwy,
Birmingham, AL 35212**

**38.9.3 Route Plan to Dispensing Site at 3325 University Blvd E.,
Tuscaloosa, AL 35404**

**38.9.4 Route Plan to Dispensing Site at 5113 Messer Airport Hwy,
Birmingham, AL 35212 then to Dispensing Site at 3325 University Blvd E.,
Tuscaloosa, AL 35404**

**38.9.5 Route Plan to Dispensing Site at 1965 Coliseum Blvd, Montgomery,
AL 36110**

38.9.6 Route Plan to Dispensing Site at 3417 Hwy 31 S, Decatur, AL 35603

38.10 Alternative Route Plans Procedures

Alternative routes consist of any deviation to the route detailed in the transport manifest. There are many reasons why a route may need to be altered, but the most common include: (1) Road Closures; (2) Roadside Emergencies; (3) Traffic Delays; (4) Change in Delivery Location availability; and (5) Possible Security Threats. If an alternate route is necessary, the driver must contact the security office and note the change in the route plan.

38.10.1 Pre-Departure Procedures

Daily inspections will be performed on each STV prior to transport. This inspection will follow the Department of Transportation (“DOT”) format and will include fuel levels, sanitation report, tire wear and tear, tire pressure, fluid levels, indication of any new damage both interior and exterior, windshield damage, proper function of turn signals, proper function of brake lights and head lights, an equipment inspection to ensure the vehicle is amply stocked with all needed supplies, and will request for both team members to sign off on the inspection. Daily inspection sheets will be submitted to management for the record.

38.11 Collection Phase

38.11.1 Verification of Secure Packaging

Individual batches of cannabis or medical cannabis prepared for storage or transport must be appropriately labeled and inserted in containers prior to transport. Batches shall be bar-coded, Q-R coded, or otherwise digitally coded to identify the following:

- (a) The batch number(s) or plant tag number(s),
- (b) the contracting licensee,
- (c) facility of origin,
- (d) the type of product,
- (e) the date of harvest and/or processing and packaging, as applicable, and
- (f) the date of the last State Testing Laboratory approval.

38.11.2 Accurate Documentation

The Applicant's Inventory Director will generate a Transportation manifest for each delivery using the state-approved Statewide Seed-to-Sale Tracking System. The Statewide Seed-to-Sale Tracking System the Applicant choose will be approved by the Commission. It will utilize an electronic inventory system (our "data collection system") to log and track all cannabis and/or medical cannabis transported by the Applicant.

Agents will use this system to log, verify, and monitor cannabis inventory from initial pick up through to final delivery. The Applicant's inventory control process will work in conjunction with the Statewide Seed-to-Sale Tracking System by utilizing RFID tags, RFID scanners, barcodes, barcode scanners, and computers to effectively manage inventory.

Transportation manifests generated by the Statewide Seed-to-Sale Tracking System will state all details pertaining to the delivery of cannabis and/or medical cannabis. This information will include: identification of the licensed cannabis manufacturer that provided the cannabis and/or medical cannabis for pick up, the name of the agent who created the manifest, the time and location of pick up, the type and weight of the product, RFID tag serial number associated with the product, identification of the licensed facility to which the product is destined, the STV the product, and the name and driver's license of the Transportation Agents. This information will first be uploaded digitally into the Statewide

Seed-to-Sale Tracking System and will thus create a virtual record of each delivery to the Commission prior to any cannabis and/or medical cannabis transport. The manifest will be an identical copy of the information uploaded to the Statewide Seed-to-Sale Tracking System printed on a piece of paper and given to the Transportation Agents as proof of his/her authorization to transport cannabis and/or medical cannabis in Alabama.

38.11.3 Transfer of Responsibility

38.11.4 Software Augmentations

The Applicant will implement complementary software that will create additional barriers against miscalculation and diversion at this phase.

38.12 Transportation Phase

The Transportation phase begins immediately after the Transportation Agent assume custody of the shipment. It is during this phase that the transporting agents are solely responsible for the cannabis and/or medical cannabis. The Transportation phase is unique in that it is the only time during the chain of custody that the product is not within a licensed cannabis facility but is instead moving across our highways and communities. It is for this reason Verano has implemented extra measures to support our transporting agents during this phase.

The Transportation Agents will be immediately supported by the Transportation Director, navigational technology, and efficient routing software.

38.12.1 Sanitation during Transport and Delivery

To ensure quality control and proper sanitation during the transport or delivery of cannabis and/or medical cannabis, the Applicant will ensure each STV is equipped with a secure lockbox or secure cargo area, which shall be used for the sanitary and secure transport of cannabis and/or medical cannabis.

Likewise, to the extent practicable, the Applicant shall implement protective measures for delivery to reduce the spread of COVID-19 and other communicable diseases as

recommended by the Alabama Department of Health, the United States Centers for Disease Control and Prevention, the Occupational Safety & Health Administration or health care professionals. These include but are not limited to providing cannabis business delivery personnel with hand sanitizer and personal protective equipment.

38.12.2 Vehicle Accidents or Breakdowns

If an emergency requires stopping the vehicle, employees must notify the Applicant's security center of the nature of the emergency and complete an incident report form provided by the Commission.

38.12.3 Theft, Attempted Theft, or Other Criminal Activity During Transportation

Immediately upon becoming aware of any loss, theft, or criminal activity involving the cannabis and/or medical cannabis being transported, the Transportation Agents will use the mobile communication device to make a report to the Security Director. If they cannot reach the Security Director, they will inform the local police department by the quickest means possible.

38.13 Delivery Phase

The delivery phase is the final step in the chain of custody.

38.13.1 Rejection of Shipment

Despite all efforts, it could be the case that a delivery location chooses to reject a delivery or a portion of a delivery. The Applicant's transportation team will be fully trained on how to handle any shipment that is rejected by the delivery location.

38.14 Policies and Procedures Manual













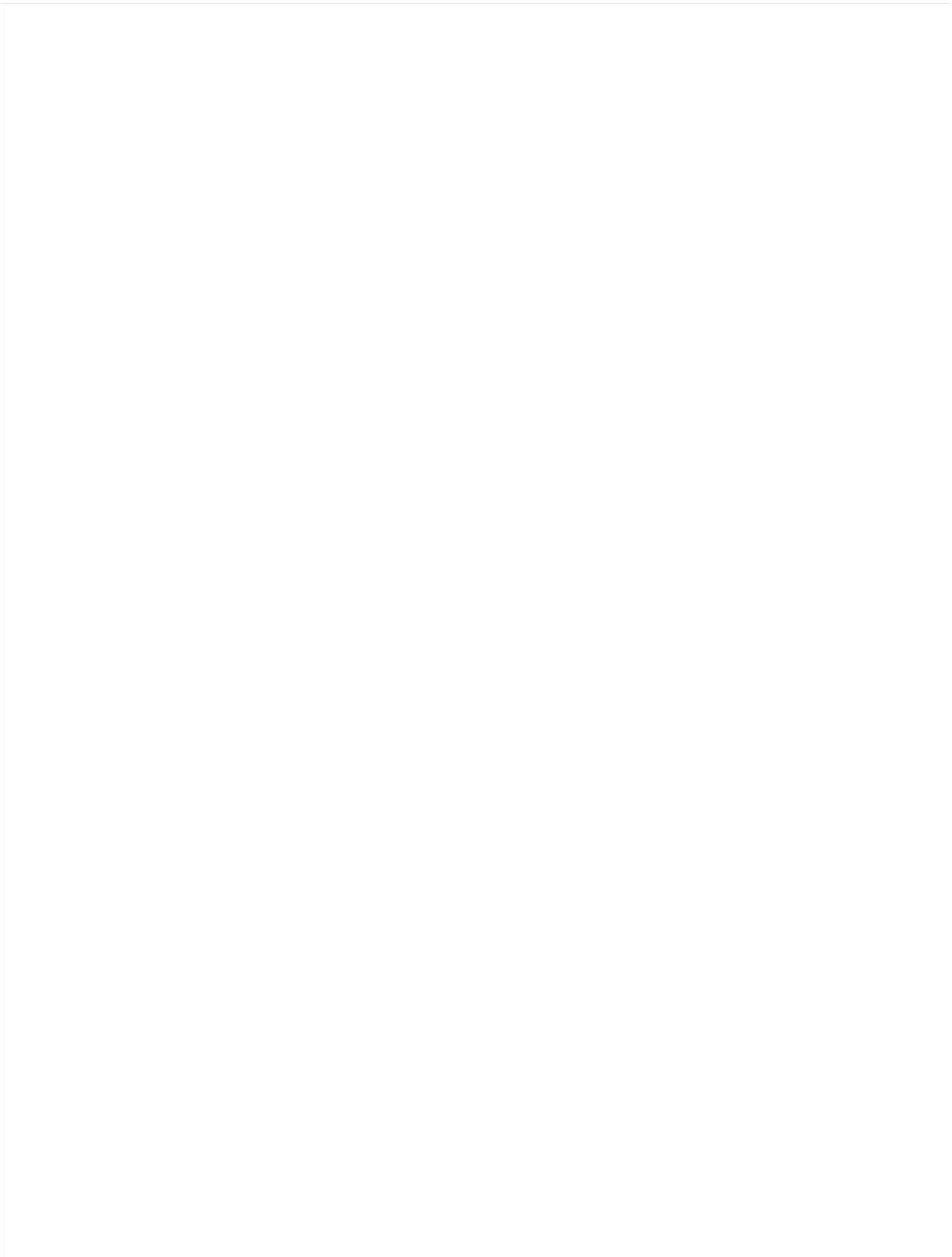












































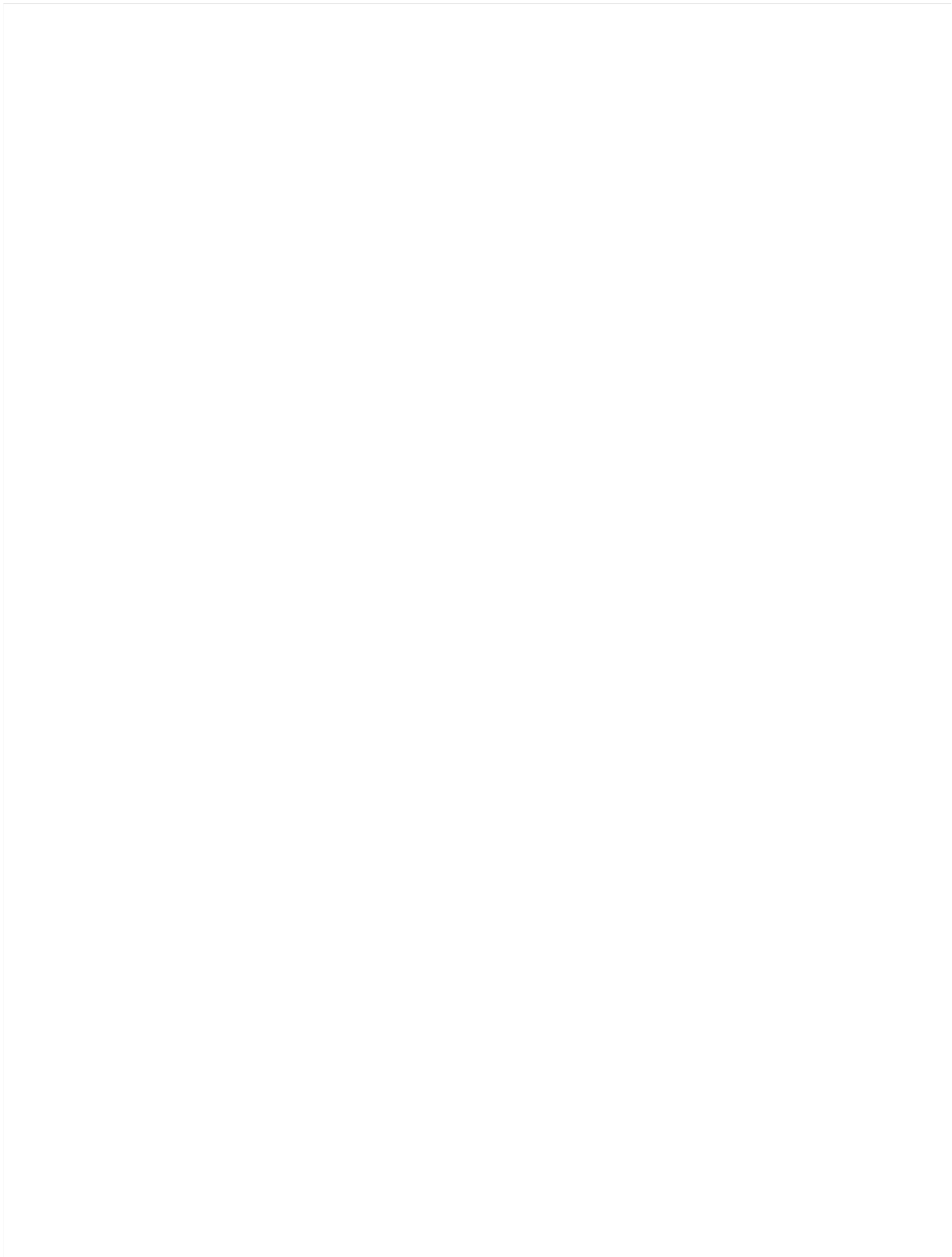






















38.



38.16 Secure Transport Vehicle Information

2016 Ford Transit Connect XL Cargo LWB

Print Brochure

2016 Ford Transit Connect XL Cargo LWB Vehicle Options	
<ul style="list-style-type: none"> • 1 12V DC Power Outlet • 15.8 Gal. Fuel Tank • 1610# Maximum Payload • 4-Way Driver Seat • 4-Wheel Disc Brakes w/4-Wheel ABS, Front Vented Discs, Brake Assist and Hill Hold Control • Aero-Composite Halogen Headlamps • Analog Appearance • Black Manual Side Mirrors w/Convex Spotter and Manual Folding • Cargo Space Lights • Cloth Door Trim Insert • Delay Off Interior Lighting • Driver And Passenger Door Bins • Dual Stage Driver And Passenger Front Airbags • Electric Power-Assist Steering • Front Center Armrest w/Storage • Front Cupholder • Front-Wheel Drive 	<ul style="list-style-type: none"> • 1 Seatback Storage Pocket • 150 Amp Alternator • 3.21 Axle Ratio • 4-Way Passenger Seat • 60-Amp/Hr 590CCA Maintenance-Free Battery w/Run Down Protection • Airbag Occupancy Sensor • Black Door Handles • Black Side Windows Trim and Black Front Windshield Trim
<ul style="list-style-type: none"> • Fully Galvanized Steel Panels • Gauges -inc: Speedometer, Odometer, Engine Coolant Temp, Tachometer and Trip Odometer • Gray Bodyside Moldings • Gray Grille • GVWR: 5,270 lbs • Integrated Roof Antenna • Manual Adjustable Front Head Restraints • Manual Tilt/Telescoping Steering Column 	<ul style="list-style-type: none"> • Clearcoat Paint • Curtain 1st Row Airbags • Delayed Accessory Power • Driver Foot Rest • Dual Stage Driver And Passenger Seat-Mounted Side Airbags • Front And Rear Anti-Roll Bars • Front Cloth Headliner • Front Only Vinyl/Rubber Floor Covering • Full Floor Console w/Storage, Full Overhead Console w/Storage and 1 12V DC Power Outlet • Gas-Pressurized Shock Absorbers • Glove Box
<ul style="list-style-type: none"> • Outside Temp Gauge • Power 1st Row Windows w/Driver 1-Touch Down • Redundant Digital Speedometer • Side Impact Beams • Sliding Rear Doors • Split Swing-Out Rear Cargo Access • Strut Front Suspension w/Coil Springs • Torsion Beam Rear Suspension w/Coil Springs • Variable Intermittent Wipers • Wheels: 16" x 6.5" Steel w/XL Full Wheel Covers 	<ul style="list-style-type: none"> • Gray Front Bumper • Gray Rear Bumper • Immobilizer • Low Tire Pressure Warning • Manual Air Conditioning • Outboard Front Lap And Shoulder Safety Belts -inc: Height Adjusters and Pretensioners • Perimeter/Approach Lights • Radio w/Seek-Scan and Clock • Seats w/Vinyl Back Material • Single Stainless Steel Exhaust • Spare Tire Stored Underbody w/Crankdown • Steel Spare Wheel • Tires: P215/55R16 97H XL AS -inc: full-size spare • Urethane Gear Shifter Material • Vinyl/Rubber Floor Trim • Engine: 2.5L Duratec 14 -inc: Flexible Fuel Vehicle (FFV) system is standard equipment for vehicles shipped to Federal Emissions States or Cross Border State dealers and is only available w/a Federal emissions system. (FFV system not available w/code 425 and requires code 936 or 423 if applicable for California Emissions State dealer destinations)

2016 Ford Transit Connect XL Cargo LWB Vehicle Description

Vehicle Disclaimer

We strive to make no mistakes in our listing, but errors are possible. Please confirm pricing, equipment & availability of vehicle. Pricing online are for our internet customers only. Prices does not include Sales Tax, Title, License Fee, Registration Fee, Dealer Documentary Fee, Finance Charges, Emission Testing Fees and Compliance Fees are additional to the advertised price. Unless the vehicle has remaining factory warranty it will fall under 1 of 2 1)implied 30 days or 1000 miles 50/50 drive train only 2)AS IS NO WARRANTY You may still purchase service contracts on most of our vehicles.





38.17 Secure Transport Drivers

The Applicant's team currently consists of two Secured Transport Drivers

As part of (or in addition to) the medical cannabis education and safety training applicable to all employees of licensees generally, transport personnel employed by a secured transporter shall annually complete and receive certification for no less than five (5) hours of training specifically tailored to driver safety and procedures related to the proper procedures to be followed when transporting cannabis and medical cannabis, pursuant to **Rule 538-x-7-.05**.

Attached below you will find a completed FORM H: SECURE TRANSPORT DRIVERS, for each of the Applicant's Secure Transportation Drivers. For each individual, the form includes the Secured Transport Driver's: (1) driver's license number; (2) social security number, if available; (3) verification that the secure transport driver is at least 21 years of age; (4) verification that the secure transport driver has a minimum of three years driver in the last three years; and (5) a list of any motor vehicle citations, fines, or violations received by the driver in the last three years (if applicable). Both Secured Transport Drivers have active CDL licenses.

As the Applicant's company grows, the Applicant will hire more Secure Transport Drivers to meet the demands of the market.

38.1.1.1 – FORM H: SECURE TRANSPORT DRIVERS

FORM H: SECURE TRANSPORT DRIVERS

Complete a separate form and verification for each of the Applicant's secure transport drivers.

Verano Alabama, LLC Integrated Facility
Business License Applicant Name License Type

Citations, Fines & Violations

List all motor vehicle citations, fines, and violations received by the driver in the last three (3) years. Attach additional forms if necessary.

Type (select all that apply): Citation Fine Violation

None

Violation/Charge Issued By
Date of Occurrence Location (City/County) Location (State)
Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By
Date of Occurrence Location (City/County) Location (State)
Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By
Date of Occurrence Location (City/County) Location (State)
Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge _____ Issued By _____

Date of Occurrence _____ Location (City/County) _____ Location (State) _____

Disposition/Amount _____ Date of Disposition _____

Type (select all that apply): Citation Fine Violation

Violation/Charge _____ Issued By _____

Date of Occurrence _____ Location (City/County) _____ Location (State) _____

Disposition/Amount _____ Date of Disposition _____

Type (select all that apply): Citation Fine Violation

Violation/Charge _____ Issued By _____

Date of Occurrence _____ Location (City/County) _____ Location (State) _____

Disposition/Amount _____ Date of Disposition _____

Applicant Verification: The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes complete and accurate information for the secure transport driver identified hereinabove (and attached, as necessary). The undersigned further verifies that the secure transport driver identified hereinabove is at least 21 years of age and has a minimum of three (3) years driving experience.

Secure Transport Driver

Title of Verifying Individual

11/14/22

Verification Date

38.1.1.1

ORM H: SECURE TRANSPORT DRIVERS

FORM H: SECURE TRANSPORT DRIVERS

Complete a separate form and verification for each of the Applicant's secure transport drivers.

Verano Alabama, LLC Integrated Facility
Business License Applicant Name License Type

Citations, Fines & Violations

List all motor vehicle citations, fines, and violations received by the driver in the last three (3) years. Attach additional forms if necessary.

Type (select all that apply): Citation Fine Violation

(None.)

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

Violation/Charge Issued By

Date of Occurrence Location (City/County) Location (State)

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Type (select all that apply): Citation Fine Violation

 Violation/Charge Issued By

 Date of Occurrence Location (City/County) Location (State)

 Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

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 Date of Occurrence Location (City/County) Location (State)

 Disposition/Amount Date of Disposition

Type (select all that apply): Citation Fine Violation

 Violation/Charge Issued By

 Date of Occurrence Location (City/County) Location (State)

 Disposition/Amount Date of Disposition

Applicant Verification: The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes complete and accurate information for the secure transport driver identified hereinabove (and attached, as necessary). The undersigned further verifies that the secure transport driver identified hereinabove is at least 21 years of age and has a minimum of three (3) years driving experience.

Secure Transport Driver

 Title of Verifying Individual

12.22.2022

 Verification Date

38.18 **Fleet Summary**

The Applicant purchased and insured the following vehicle in Alabama specifically for this project. The vehicle will sit idle while the Commission evaluates Applicants. To meet and exceed the Commission expectations of potential Licensees, the Applicant has gone above and beyond to demonstrate financial and operational wherewithal.

Make: 2016 FORD - **Model:** TRANSIT CONNECT XL CARGO LWB

Specifications: Provided below:

2016 Ford Transit Connect XL Cargo LWB

Print Brochure

2016 Ford Transit Connect XL Cargo LWB Vehicle Options	
<ul style="list-style-type: none"> • 1 12V DC Power Outlet • 15.8 Gal. Fuel Tank • 1610# Maximum Payload • 4-Way Driver Seat • 4-Wheel Disc Brakes w/4-Wheel ABS, Front Vented Discs, Brake Assist and Hill Hold Control • Aero-Composite Halogen Headlamps • Analog Appearance • Black Manual Side Mirrors w/Convex Spotter and Manual Folding • Cargo Space Lights • Cloth Door Trim Insert • Delay Off Interior Lighting • Driver And Passenger Door Bins • Dual Stage Driver And Passenger Front Airbags • Electric Power-Assist Steering • Front Center Armrest w/Storage • Front Cupholder • Front-Wheel Drive 	<ul style="list-style-type: none"> • 1 Seatback Storage Pocket • 150 Amp Alternator • 3.21 Axle Ratio • 4-Way Passenger Seat • 60-Amp/Hr 590CCA Maintenance-Free Battery w/Run Down Protection • Airbag Occupancy Sensor • Black Door Handles • Black Side Windows Trim and Black Front Windshield Trim
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Vehicle Disclaimer

We strive to make no mistakes in our listing, but errors are possible. Please confirm pricing, equipment & availability of vehicle. Pricing online are for our internet customers only. Prices does not include Sales Tax, Title, License Fee, Registration Fee, Dealer Documentary Fee, Finance Charges, Emission Testing Fees and Compliance Fees are additional to the advertised price. Unless the vehicle has remaining factory warranty it will fall under 1 of 2 1)implied 30 days or 1000 miles 50/50 drive train only 2)AS IS NO WARRANTY You may still purchase service contracts on most of our vehicles.

38.19 Commercial Driver's License

As described throughout the application, the Applicant owns and will only use *Transit Connect* (manufactured by Ford) as their Secure Transportation Vehicles. As such, based on the Alabama commercial drivers license requirements, **the Applicant will not operate a vehicle that requires a Commercial Drivers License.**



While classes of Commercial Drivers License licenses can vary from state to state, Alabama classifies commercial vehicles that require a Commercial Drivers License to drive as follows:

- **Class A:** Operate vehicles weighing more than 26,001 pounds that tow trailers or other vehicles weighing over 10,000 pounds.
- **Class B:** Operate vehicles weighing more than 26,001 pounds and tow trailers or vehicles that weigh less than 10,000 pounds.
- **Class C:** Operate vehicles that can transport 16 or more people or vehicles that transport hazardous materials.

The Applicant Ford Transit Connect **does not qualify** for A, B, nor C Classification.

Nonetheless, the Applicant's Secured Transport Drivers, are both properly trained and possess Commercial Drivers Licenses. The Applicant's Secured Transport Drivers have successfully passed knowledge and skills tests to obtain their Commercial Drivers License, as evidenced by the copy of their current and active Commercial Drivers License below. These individuals have the requisite training and shall maintain compliance with all federal, state, and local laws applicable to them at all times while employed as a driver.

38.20 License Plate Number and DOT Numbers

DOT Numbers | The Gross Vehicle Weight Rating (GVWR) of the transport vehicle is below 26,000 pounds and exempt from getting a DOT intrastate number. The exemption applies to a Gross Combination Weight Rating (GCWR) under 26,000 pounds. The vehicle will not transport hazardous materials or waste nor be considered a passenger bus.

The following specifications document, provided by the dealership, indicates the 2016 Ford Transit GVWR is **5,270 pounds**. The applicant does not intend to transport more than **10-20 pounds of cargo at a time**.

2016 Ford Transit Connect XL Cargo LWB Vehicle Options	
<ul style="list-style-type: none">• 1 12V DC Power Outlet• 15.8 Gal. Fuel Tank• 1610# Maximum Payload• 4-Way Driver Seat• 4-Wheel Disc Brakes w/4-Wheel ABS, Front Vented Discs, Brake Assist and Hill Hold Control• Aero-Composite Halogen Headlamps• Analog Appearance• Black Manual Side Mirrors w/Convex Spotter and Manual Folding• Cargo Space Lights• Cloth Door Trim Insert• Delay Off Interior Lighting• Driver And Passenger Door Bins• Dual Stage Driver And Passenger Front Airbags• Electric Power-Assist Steering• Front Center Armrest w/Storage• Front Cupholder• Front-Wheel Drive• Fully Galvanized Steel Panels• Gauges -inc: Speedometer, Odometer, Engine Coolant Temp, Tachometer and Trip Odometer• Gray Bodyside Moldings• GVWR: 5,270 lbs• Manual Adjustable Front Head Restraints• Manual Tilt/Telescoping Steering Column	<ul style="list-style-type: none">• 1 Seatback Storage Pocket• 150 Amp Alternator• 3.21 Axle Ratio• 4-Way Passenger Seat• 60-Amp/Hr 590CCA Maintenance-Free Battery w/Run Down Protection• Airbag Occupancy Sensor• Black Door Handles• Black Side Windows Trim and Black Front Windshield Trim• Clearcoat Paint• Curtain 1st Row Airbags• Delayed Accessory Power• Driver Foot Rest• Dual Stage Driver And Passenger Seat-Mounted Side Airbags• Front And Rear Anti-Roll Bars• Front Cloth Headliner• Front Only Vinyl/Rubber Floor Covering• Full Floor Console w/Storage, Full Overhead Console w/Storage and 1 12V DC Power Outlet• Gas-Pressurized Shock Absorbers• Glove Box• Gray Front Bumper• Gray Rear Bumper• Immobilizer• Low Tire Pressure Warning• Manual Air Conditioning• Outboard Front Lap And Shoulder Safety Belts -inc: Height

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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Exhibit 39 – Quality Control and Quality Assurance Plan

Verification

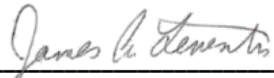
The undersigned verifies that the information contained in this Exhibit, including any attachments thereto, is accurate and complete, based on the best available information at the date of verification.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

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39.1 Steps to be taken in the manufacturing process to provide high quality products and/or to ensure the safety, potency, stability, lifespan, and consistency among batches of the same product, whether as required by law or otherwise.

The Applicant has manufactured over 1 billion grams of cannabis over the last decade in seventeen states and has highlighted the steps it takes in the manufacturing process to provide high-quality products and/or to ensure the safety, potency, stability, lifespan, and consistency among batches of the same product, whether as required by law or otherwise. MasterControl, a Food and Drug Administration (FDA) approved reverse traceability software, tracks training, stores and manages SOPs, and aids in the tracking of corrective actions per agent. The Applicant will enhance the safety of medical cannabis products throughout Alabama by responsibly operating a sanitary processing facility that produces safe and unadulterated medical cannabis. In compliance with **Rule 538-x-6-.04-4.**, the Applicant will maintain its license status in good standing and properly adhere to rules and regulations regarding the Commission inspections, quality control, quality assurance and license renewal. Also, the Applicant will always maintain the standards and practices set forth in the business plan and operating plan submitted to the Commission at the time of application or as thereafter amended, in compliance with **Rule 538-x-6-.04-5.**

39.1.1 Current Good Manufacturing Practices (CGMP), Hazard Analysis of Critical Control Points (HACCP), and Corrective and Preventive Actions (CAPA)

The Applicant will implement CGMP as a framework for cultivation procedures, product formulation development, product batch manufacturing, in house testing, and overall quality control.

Using documented good quality practices and meeting current Good Manufacturing Practices, the Applicant will process

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cannabis produced by its internal cultivation operations as well as from a cultivator into an approved medical cannabis product, pursuant to **Rule 538-x-6-.04-1**.

39.1.2 Leadership Responsibilities for QA/QC

The Applicant's **Cultivation Director**, **Processing Director** and **Dispensary Director** will be responsible for ensuring compliance with the Act and the Commission's rules, including ensuring that: 1) Medical cannabis products have been properly prepared, labeled, controlled, stored, sold, and distributed in accordance with the Act and Rules; 2) All aspects of the cultivation, processing, and dispensing process are documented and that accurate records for all cannabis and medical cannabis products prepared and sold by the Applicant are maintained; 3) Cultivation, processing, and dispensing personnel are capable of and qualified to perform their assigned duties; 4) Ingredients used in processing have their expected identity, strength, quality, and purity consistent with the requirements; 5) Medical cannabis products are manufactured with acceptable strength, quality, and purity, are packaged with appropriate packaging and labeling, and are prepared in accordance with good manufacturing practices; 6) Critical processes are recorded and validated to ensure that procedures will consistently result in the expected strength, quality, and purity in the finished cannabis products; 7) The cultivation, processing, and dispensing environment is suitable for its intended purpose; 8) Appropriate stability testing is performed or is determined from literature for establishing reliable expiration dating to ensure that the finished medical cannabis products have their expected strength, quality, and purity, at least until the labeled expiration date; 9) Cultivation, processing, and dispensary conditions and standard operating procedures are in place to minimize the potential for errors; 10) Any confirmed failure of a medical cannabis product to meet the standard of acceptable strength, quality, purity, packaging, and labeling is reported to the Commission within 24 hours of incident confirmation; and 11) Adequate procedures and records exist for investigating and correcting failures or problems in cultivation, processing, dispensing, quality control, or in the medical cannabis product itself. Personnel employed by the Applicant will have appropriate education and/or experience to assume responsibility for positions that would affect compliance with the Act and the Commission's rules.

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The Applicant has hired five proposed **Certified Dispensers** for each dispensary, currently licensed Alabama pharmacists, to meet all the requirements of **Rule 583-x-8-.03**. The Certified Dispensers will supervise the dispensing of medical cannabis at its dispensaries. The Applicant will ensure that the Certified Dispensers have undergone training and certification as required by the Commission to oversee the dispensing of medical cannabis to a registered qualified patient or registered caregiver at a dispensing site, pursuant to **Rule 583-x-8-.03-1**. The Applicant will require that a Certified Dispenser must be always on duty while the dispensing site is open for business; the Certified Dispenser must oversee and sign off on all sales of medical cannabis as the dispensary employee ultimately responsible for each transaction, in accordance with **Rule 583-x-8-.03-2**.

39.1.3 Employee Training on Quality Assurance and Control

Experts on CGMPs for food and drug manufacturing will train the Applicant's employees responsible for manufacturing medical cannabis products on topics including safe handling, storage, and disposal of chemicals, including use of proper PPE depending on safety data sheets (SDS), and manufacturer instructions for each chemical.

Other training specific to chemicals will include how to store solvents and how to sanitize equipment using chemicals stored in a fireproof locker. To further prevent health hazards, staff will complete training specific to each critical control point. Critical control points are points, steps, or procedures in a process where there is a high probability that improper control could result in an unacceptable health hazard or contribute to the contamination of the final product. Also related to product safety, staff will complete training on quality control operations, which are planned and systematic procedures for taking actions necessary to prevent product from being adulterated. Additionally, in accordance with **§20-2A-64(e)(2)**, the Applicant will undergo the Commission established training program for dispensers that addresses proper dispensing procedures and other topics relating to public health and safety and preventing abuse and diversion of medical cannabis.

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39.1.4 Employee Sanitation and Safety

Within the Integrated Facility, agents are required to enter the employee locker room, change out of their street clothing, shower, change in Cintas uniforms, gown, then enter the work area in a one directional flow. Agents for cultivation, processing and dispensing must conform to sanitary practices while on duty, including the following: 1) Maintaining adequate personal hygiene and adequate personal cleanliness; 2) Refraining from having direct contact with cannabis or medical cannabis if the person has or may have an illness, open lesion, including boils, sores or infected wounds, or any other abnormal source of microbial contamination, until the condition is corrected; 3) Wearing proper clothing, including gloves; and 4) Washing hands thoroughly in an adequate hand-washing area before starting work and at any other time when hands may have become soiled or contaminated. The Applicant will require that all employees immediately notify their supervisor when they experience any of the common symptoms of illness that can be easily spread. In addition to notifying a supervisor when infected with a contagious illness, an employee must notify their superior regarding anything that could jeopardize the sanitation of the Applicant's operations. Moreover, any employee who, by medical examination or supervisory observation, is shown to have an illness, open lesion (e.g., boils, sores, infected wounds), or any other abnormal source of microbial contamination will be excluded from any operations that may be expected to result in microbial contamination of cannabis or medical cannabis product until the condition is corrected.

The Applicant will provide gloves, shoe covers, beard nets, coveralls, and respirators for use in conjunction with hazardous and potentially health-afflicting materials. The Applicant will require personal protective equipment (PPE) to be used when participating with certain aspects of cultivation and processing. Agents will be trained on how to properly wear and use PPE. Each task that employees perform will have an associated SOP, which details any PPE required for the specific task. The Applicant will keep PPE readily available and adequately stocked in areas where it may be required. Staff will be trained to inspect PPE prior to each use and must dispose of any damaged equipment or mark it as damaged and send it for repair.

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39.1.5 Facility Sanitation and Standards

The Applicant's staff will perform regular cleanings to keep all cultivation, processing, and dispensing facilities clean and free of debris to minimize risk of contamination of cannabis and medical cannabis products. Floors, walls, and ceilings will be of sturdy, easily cleanable material so that they may be kept clean and in good repair. In addition to selecting building materials for internal surfaces that are conducive to sanitation and maintenance, the Applicant will also tightly control other variables within the facility such as the air, water, lighting, ventilation, temperature, and humidity.

To enforce and maintain sanitary conditions at the facility, the Applicant will ensure that: 1) all work areas are clean, dry, and free of clutter or trash; 2) all trash is placed in proper receptacles, never stored in proximity to cannabis or medical cannabis, and removed immediately from critical areas; 3) all managers schedule and oversee regular facility maintenance and cleaning; 4) cracks, windows, doorframes, drain areas, and floor joints are properly sealed to prevent pest movement; 5) weeds or pest habitats or possible habitats are prevented or eradicated from the area surrounding the facility; and 6) staff will maintain waste treatment and disposal systems in good working order so that they do not cause contamination of any areas of the facility.

The Applicant will cultivate cannabis in fully enclosed, sealed rooms and the integrity of these rooms will serve as the primary barrier to prevent pest contamination in the cultivation areas.

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39.1.6 Equipment Sanitation and Standards

The Applicant will ensure that any equipment used to cultivation, process, dispense, package or hold cannabis or medical cannabis products meets the following: 1) is of appropriate design and adequate size and is suitably located to facilitate operations for its intended use and for its cleaning and maintenance; and 2) is constructed so that surfaces which have direct contact with components, in-process materials, cannabis or medical cannabis products are not reactive, additive or absorptive so as to alter the safety, identity, strength, quality or purity of the cannabis or medical cannabis products. All incoming cultivation, processing, and dispensing equipment require sanitation, calibration, inspection, and ongoing maintenance. The frequency of these equipment tests is determined upon the acquisition of the equipment. Staff will maintain and sanitize equipment in each operating unit at appropriate intervals to prevent malfunctions or contamination that could alter the safety or purity of the Applicant's cannabis and medical cannabis items.

39.1.7 Chemical Handling

The Applicant will use solvents, chemicals, cleaning solutions, and other sanitizing agents approved for use around vegetables, fruit, or medicinal plants and will store them in a manner that protects against contamination. The Applicant's Quality Director will verify that chemical handling procedures comply with all applicable state and federal regulations. All chemicals will be maintained and stored in such a way as not to contaminate in-process, finished products, or equipment with packaging-contact surfaces. Chemicals will be stored in locked safety cabinets that solely contain chemicals that are compatible to be stored in the same safety cabinet.

To ensure the quality and safety of chemicals, they will not be stored on the floor, in direct sunlight, or

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near heat sources. The chemical storage area will be kept clean, cool, dry, well lit, and well ventilated.

39.1.9 Standards for Medical Cannabis Products

In accordance with **Rule 538-x-6-.04-2.**, the Applicant will ensure that all medical cannabis manufactured or offered for sale by the Applicant must: a) be shown to meet intended levels of purity; b) be shown to be reliably free of toxins and contaminants (see Appendix A to Chapter 10 of the Commission’s Rules); c) contain no additives other than pharmaceutical grade excipients; d) not be processed into a form that is attractive to or targets children; and e) as to all gelatinous cube, cuboid, and lozenge medical cannabis products, conform to the universal flavor established by the Commission under **§ 20-2A-63(f)**, Code of Alabama 1975, which is peach. Similarly, the Applicant will ensure that all medical cannabis it manufactures

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or offers for sale are medical grade, manufactured using documented good quality practices, and meet Good Manufacturing Practices, such that the product is shown to meet intended levels of purity and be reliably free of toxins and contaminants, pursuant to **§20-2A-63(c)(1)**.

Additionally, the Applicant will verify that all the medical cannabis products it manufactures or offers at its dispensaries has packaging and labeling that complies with **Rule 538-x-6-.05** and **§20-2A-63(e)**. The Applicant will verify that its medical cannabis product offerings have successfully passed all official tests by a State Laboratory Testing, as described in **§20-2A-66**. and **Chapter 10** of the Commission's rules. The Applicant will only sell and dispense medical cannabis at a dispensing site to a registered qualified patient or registered caregiver only after it has been tested and bears the label required for retail sale, in accordance with **§20-2A-64(d)(3)**. Also, pursuant to **§20-2A-63(d)**, the Applicant will not manufacture or offer for sale medical cannabis products that are attractive to or targets children, including all of the following which are prohibited. Additionally, the Applicant will only procure products from vendors that perform stability testing at six and 12 months to ensure product potency and purity as well as to support or debunk the expiration date.

39.1.10 Consistency Among Batches of the Same Products

All batches of cannabis and medical cannabis are grown, processed, and manufactured under the same environmental conditions, using the same equipment, utilizing standardized processes developed over a decade of cannabis manufacturing.

39.1.11 Incoming Product Inspections

The Applicant will implement processes developed in other markets to ensure safe medical cannabis products begins at receipt from the vendor. Paperwork, including a Certificate of Analysis testing, supplied to the vendor from the third-party State Testing Laboratory, must accompany medical cannabis products received by the Applicant.

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Cannabis and medical cannabis products that fail inspection will be segregated and placed under quarantine within the secured storage area.

39.1.12 Expiration Dates

The Applicant will not sell any medical cannabis product after its expiration date. For products that the Applicant produces, the Applicant will determine the expiration date based on stability testing information.

Batches of cannabis and medical cannabis, incoming and outgoing will contain expiration dates clearly labelled on each package, in compliance with **Rule 538-x-6-.05** and **.06**.

39.2 A plan for performing, at its own expense after licensure, quality control and testing of a qualified sampling

As described in detail below, the Applicant will perform tests to ensure that all cultivated, processed, and dispensed products are reliably high grade and maintains consistency among

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batches as required by the Act and Chapter 10 of the Commission's rules, pursuant to **Rule 538-x-10-.04-5**. At least quarterly, the Applicant will, at their own cost, have cannabis sampled by the State Testing Laboratory licensed by the AMCC in compliance with **Rule 80-14-1-.13**, and stored for at least two years.

a State Testing Laboratory perform tests per batch on behalf of the Applicant (scheduled official testing) at least once during each phase of the cannabis production during which testing is required, prior to the cannabis or medical cannabis leaving the cultivation, processing or dispensing phase or department, pursuant to **Rule 538-x-10-.04-4**.

Importantly, the Applicant will not submit cannabis (as opposed to medical cannabis) to a State Testing Laboratory for testing unless the cannabis is destined for extraction and weighed within two (2) hours after harvest, pursuant to **Rule 538-x-10-.04-13**. In-house testing includes potency, water activity, and terpene testing on all Applicant products and incoming medical cannabis from vendors.

In accordance with **Rule 538-x-10-.04-6**, the Applicant will engage a Commission approved State Testing Laboratory to perform tests pursuant to the protocols and corresponding tolerance limits in accordance with the current minimum standards established by the Commission, which shall be available on the Commission's website.

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Additionally, in accordance with **Rule 538-x-10-04-9**, the Applicant will also have the State Testing Laboratory perform other tests necessary to determine the Applicant's compliance with good manufacturing practices, including but not limited to the following: a) Tests demonstrating that medical cannabis is medical grade; b) Tests demonstrating that medical cannabis contains no active ingredients other than cannabis provided by a licensee under the Act and this Chapter; c) Tests demonstrating that any excipients are pharmaceutical grade within safe and effective levels, in accordance with the formulae provided by a Processor or Integrated Facility; and d) Any other tests as may be reasonable, necessary, and appropriate to demonstrate good manufacturing processes.

39.2.2 Requirements for State Testing Laboratory

The Applicant will only use a Commission approved State Testing Laboratory that meets all of the requirements of **Rule 538-x-10-04**, including but not limited to State Testing Laboratories that: 1) have met and maintained the requirements for a State Testing Laboratory in international standard ISO/IEC 17025 published by the International Organization for Standardization, pursuant to **Rule 538-x-10-05-1**.; 2) is accredited by an impartial organization that operates in conformance with standard ISO/IEC 17011 of the International Organization for Standardization and is a signatory to the Mutual Recognition Arrangement of the International Laboratory Accreditation Cooperation, in accordance with **Rule 538-x-10-07**; and 3) have undergone and passed Proficiency Testing as required by the Commission, in accordance with **Rule 538-x-10-06**.

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39.2.3 Sample Collection and Chain of Custody

First, the Applicant acknowledges that the State Testing Laboratory which will perform the tests must collect the samples from the Applicant's facilities, in accordance with **Rule 538-x-10-03-3.a.(1)**. The Applicant will request that three samples are collected at the same time by a State Testing Laboratory using tamper-resistant containers for retesting purposes. One of the samples must be taken by the State Testing Laboratory for testing and the Applicant will place the other two samples in a secure quarantine storage area at its facility for further retesting by a secondary State Testing Laboratory, pursuant to **Rule 538-x-10-08-6**. The Applicant will ensure that, at the time of collection, the State Testing Laboratory will obtain a sample large enough to undergo two tests. The State Testing Laboratory shall keep any sample which fails testing for 30 days (or longer, at the request of the Commission) pending a request by the licensee to (A) seek retesting, (B) challenge the result, or (C) accept the result and seek remediation of the failed sample and/or the batch from which it was derived. A sample kept by the State Testing Laboratory pursuant to this subsection must be stored in a cool, dry area to prevent or minimize deterioration, and the sample shall be made available to the licensee upon request for further testing in furtherance of any challenge or attempt to remediate. A cannabis testing facility shall dispose of a sample kept pursuant to this subsection after 30 days have elapsed after failure of testing, barring a contrary request by the Commission, in accordance with **Rule 538-x-10-08-4**.

Pursuant to **Rule 538-x-10-04-12.**, a sample of cannabis for testing must be at least ten (10) grams and no more than thirty (30) grams; a sample of a production run of medical cannabis must be the lesser of one percent (1%) of the total product weight of the production run or ten (10) units of product. All samples must be homogenized before testing. A sample taken for testing by an approved State Testing Laboratory will accurately represent the batch of cannabis and medical cannabis being tested. In compliance with **Rule 538-x-10-03-3. a.(2)**, if the Applicant has segregated the lot or batch of cannabis or medical cannabis into batches smaller than the entire lot or production run, the State Testing Laboratory must sample and test each batch from the lot.

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From the time that a lot or production run has been homogenized for sample testing and eventual packaging and sale to a patient or caregiver, the Applicant will segregate and withhold from use the entire lot or production run, except the samples that have been removed by the State Testing Laboratory for testing, pursuant to **Rule 538-x-10-03-3.a.(3)**. Also, during segregation, the Applicant's facility which provided the sample will maintain the lot or production run in a secure, cool, and dry location to prevent the cannabis or medical cannabis from becoming contaminated or losing its efficacy, pursuant to **Rule 538-x-10-03-3.a.(4)**.

39.2.4 Retention Sampling and Testing

The Applicant will retain samples of cannabis and medical cannabis to perform stability testing as well as provide support for product potency, purity, and shelf life. At 6 months and 12 months after the release of the batch or lot, the Applicant will provide the State Testing Laboratory with a portion of the retention sample for stability testing.

If the stability testing debunks the listed expiration date of the batch or lot, the Applicant will amend its standard operating procedure on choosing an expiration date for a batch or lot and base its amended standard operating procedure on the results of stability testing.

39.2.5 Tracking and Recordkeeping of Tests

The Applicant will ensure that the State Testing Laboratory, will at a minimum, monitor, track, and enter the information outlined in **Rule 538-x-10-04-14**. into the Statewide Seed-to-Sale Tracking System (METRC) as to each sample to be tested, including: a) The identity of the licensee for whom testing is to be performed; b) Where and how the sample was obtained; c) The size, count or weight, as available, of the sample obtained; d) The date and time the sample was obtained; e) The identity of the transporter, including any Secure Transporter, if any, including the identity of the personnel and vehicle involved in the transport; f) The date and time of the sample's arrival at the State Testing Laboratory; g) The tag, lot, or batch number (and any other information contained on the digital or QR code)

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applicable to the cannabis or medical cannabis, as available, from which each sample was obtained; h) The conditions of storage upon arrival at the State Testing Laboratory; i) The date and time testing commenced; j) The types of tests undertaken by the State Testing Laboratory and the amount of the sample used for each test; k) The date and time testing concluded; l) The results of testing; m) Any steps to be taken as a result of such testing; n) Any steps to be taken to dispose of or return any unused sample material; and o) If returned, the date and time of the sample material's departure from the laboratory.

39.2.6 Test Results

The Applicant will ensure that the State Testing Laboratory will provide the final certificate of analysis containing the results of testing pursuant to Chapter 10 of the Commission's rules to the Applicant within two (2) business days after obtaining the results, in compliance with **Rule 538-x-10-.08-1**. The Applicant acknowledges that, pursuant to **Rule 538-x-10-.08-2.**, if a sample from a batch of cannabis fails an official test conducted by a State Testing Laboratory, the remainder of the batch, including any cannabis plant trim, leaf; and other usable material from the same batch automatically fails the official test. Also, if a sample from a batch in the production of medical cannabis fails an official test conducted by a State Testing Laboratory, the entire batch from which the sample was taken automatically fails the official testing, in accordance with **Rule 538-x-10-.08-3**. However, the Applicant will use any batch of cannabis that fails a microbial screening to make a CO₂ or solvent-based extract. After processing, the CO₂ or solvent-based extract must pass all required official tests, pursuant to **Rule 538-x-10-.08-2.b**.

The Applicant acknowledges that, in accordance with **Rule 538-x-10-.08-5.**, within seven (7) days following a failed test, the Applicant must take at least one of the following actions:

- a. **Accept.** Accept the results of the test and destroy the batch.
- b. **Retest.** Request in writing (with copy to the Commission provided electronically through METRC) that the State Testing Laboratory retest the sample as to the portion of the test that failed; if the second test of the same sample passes, the sample (if available, otherwise a parallel sample taken by the Applicant under **Rule 538-x-10-.08-6.**) shall be

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sent to another State Testing Laboratory, if available, as chosen by the Commission, to provide a tiebreak test (the Commission's function shall not be to gatekeep such a request, but merely to assign the State Testing Laboratory that will administer the subsequent retest). The results of the tiebreak test are final.

- c. **Challenge.** Following a test or failed retest by the State Testing Laboratory, the Applicant may challenge the results by a request in writing (with copy to the Commission provided electronically through METRC) that two additional State Testing Laboratories be chosen by the Commission, if available; the two additional State Testing Laboratories shall provide full testing of the parallel samples taken by the licensee under **Rule 538-x-10-.08-6.** (the Commission shall not be to gatekeep such a request, but merely to assign the State Testing Laboratory that will administer the subsequent retest). If both challenge tests are deemed valid and demonstrate that the batch passed, the challenge is successful and the batch is cleared for use; otherwise, the challenge is unsuccessful, and the batch must be destroyed. The Applicant acknowledges that the Commission shall be the final arbiter of any challenge under this rule.
- d. **Remediate.** Attempt to remediate the batch and request in writing (with copy to the Commission provided electronically through METRC) that the State Testing Laboratory obtain new samples and retest the remediated batch. Batch Remediation effects a reset of the testing process: testing prior to remediation is not considered, but only the testing of the new, remediated batch.

The Applicant acknowledges that it may not challenge or request a retest by a State Testing Laboratory unless, at the time samples are initially taken for testing, the Applicant ensures that three samples are collected at the same time by a State Testing Laboratory using tamper-resistant containers. One of the samples must be taken by the State Testing Laboratory for testing and the Applicant will place the other two samples in a secure quarantine storage area at its facility for further retesting by a secondary State Testing Laboratory. If at any time, further testing cannot be performed due to (A) the lack of available State Testing Laboratories to conduct further or additional tests, or (B) the lack of viable samples from which to perform retesting, tiebreak testing, or challenge testing, the Applicant will have no

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choice but to accept the result of the failed test and destroy or attempt remediation of the batch, pursuant to **Rule 538-x-10-.08-6**.

The Applicant acknowledges that it may request a retest as often as it likes but will not challenge the results of the test conducted by the State Testing Laboratory more than three (3) times during a one-year period; however, a successful challenge leading to a reversal of the original failed test shall not count toward the three (3) times, in compliance with **Rule 538-x-10-.08-7**. The Applicant acknowledges that a licensee requesting a retest shall be responsible for all costs involved in a retest performed, pursuant to **Rule 538-x-10-.08-8**.

Barring contrary results based on a retest or challenge, if, upon retesting, a sample provided to a State Testing Laboratory sample fails the same official test, the Applicant will destroy and dispose of the entire batch from which the sample was taken and document the destruction and disposal of the batch to METRC. A batch so destroyed and disposed of must not be recognizable as cannabis or medical cannabis, nor shall it be usable for any legal or illegal purpose, in accordance with **Rule 538-x-10-.08-9**.

If a sample provided to a State Testing Laboratory pursuant to this section passes the same official test upon retesting and tiebreak testing by a separate State Testing Laboratory, the Applicant need not destroy the entire batch; instead, the State Testing Laboratory shall clear the batch for further processing, packaging, labeling or sale, as appropriate, by means of certificate provided to the Applicant and a notation on METRC, pursuant to **Rule 538-x-10-.08-10**.

39.3 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.

Below, the Applicant outlines its plan for the return and remediation or destruction of failed test samples, including entry of the event on METRC.

39.3.1 Return of Failed Test Samples

If the Applicant is notified that a sample failed an official test and the retest, the Applicant will request for the State Testing Laboratory to return the failed sample to the Applicant's

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facility so that the Applicant can attempt to remediate the failed sample and/or batch from which it was derived. To assist in accomplishing this, the Applicant will inform the State Testing Laboratory of the days and times that the Applicant will accept failed test samples returns at its facility. The Applicant will require the State Testing Laboratory to record the date and time of the failed test samples departure from the laboratory into METRC. The Applicant will also log the returned samples, including a description of the condition and weight, . Returned failed samples as well as the batch from which it was derived will be segregated and stored in a clearly marked area of the secured quarantine storage area.

39.3.2 Remediation of Failed Test Samples

In accordance with **Rule 538-x-10-.08-2.a.**, the Applicant acknowledges that a batch that fails an official test may be remediated and retested upon the request of the Applicant. Initial retesting shall occur using the same sample at the same State Testing Laboratory; however, at the discretion of the licensee, subsequent retesting may occur at a different State Testing Laboratory, if available.

Any cannabis or medical cannabis that has failed an official test and retest by a State Testing Laboratory will be subjected to further processing to remove dangerous substances or other contaminants or otherwise bring the cannabis or medical cannabis within appropriate testing ranges. The Applicant will perform remediation at its facility and such processes may include those that change the form or chemical makeup of the regulated cannabis or medical cannabis (i.e., formal remediation), or not (i.e., decontamination), pursuant to **Rule 538-x-1-.04-49.**

the Applicant will perform tests and implement processes to bring non-compliant cannabis or medical cannabis within proper testing parameters prior to official testing by a State Testing Laboratory. The Applicant acknowledges that private testing may only occur pursuant to an advance request for a private test by the Applicant (made at or before the time of collection of the batch or lot for testing). Unlike an official test, the results

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of such private testing shall not fulfill the requirement of testing under the Act and Rules, and the State Testing Laboratory shall not report the results to the Commission unless a licensee requests that it do so, pursuant to **Rule 538-x-10-.03-3.d.**

The Applicant also acknowledges that batch remediation effects a reset of the testing process: testing prior to remediation is not considered, but only the testing of the new, remediated batch, in accordance with **Rule 538-x-10-.08-5.d.** Thus, the Applicant will ensure that all sampling and testing of the remediated batch (including retesting and the challenging of test results) is done in compliance with the Commission's regulations and follow the procedures outlined in above in *Section 39.2.*

39.3.3 Destruction of Failed Test Samples and the Batch from Which it was Derived

From

The Applicant has developed a comprehensive system for collecting, destroying, and disposing of any failed test samples and the batch from which it was derived from. All cannabis and medical cannabis waste generated at the facility will be rendered unusable and unrecognizable through shredding and mixing using sophisticated machinery, which will render cannabis, medical cannabis, and failed test samples completely unrecoverable. In other words, the Applicant will destroy any cannabis material that is not used in medical cannabis in such a way as to render the material unusable and unrecognizable, in accordance with **Rule 80-14-1-.11.**

The Applicant will only render cannabis and medical cannabis waste unusable within the secured waste storage area under surveillance and ensure the requisite number of employees are present to conduct this task without compromising security. The Applicant's Quality Assurance Director will oversee the destruction of all cannabis and medical cannabis waste. When the destruction of medical cannabis waste is required, the Quality Assurance Director will undertake, or oversee employees who undertake, the following shredding and mixing process.

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The Applicant will enter the destruction and disposal records into METRC, in accordance with **Rule 80-14-1-.11**, and as described below.

39.3.4 Entry into the Statewide Seed-To-Sale Tracking System

The Applicant will require agents to document the following into METRC: 1) The batch number, product name, and quantity of cannabis or medical cannabis waste; 2) A description of the cannabis or medical cannabis waste; 3) Reason for disposing the cannabis or medical cannabis waste; 4) Details of the method of destruction; 5) Date and time of the destruction; 5) Location at which the cannabis or medical cannabis will be destroyed; 6) If a recalled product, the date of the original sale and the name of the licensee to which the product was sold; 7) Name and quantity of the non-cannabis compostable waste used for mixing (or non-compostable waste, if applicable); 8) Names and ID numbers of the agents conducting the destruction and disposal activities; 9) Name and ID number of the manager overseeing the destruction and disposal activities; and 10) Name and address of the local health

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department-approved waste hauler, municipal waste landfill, or resource recovery facility which will accept the waste for disposal. All waste cannabis, medical cannabis, and failed test samples will be weighed, recorded, and entered prior to destruction and disposal.

39.4 Conclusion

As shown above, the Applicant addressed all items of Exhibit 39 and far exceeds the minimum required criteria of the Commission. The Applicant prepared this plan with meticulous attention to details to ensure all its medical cannabis products manufactured or offered for sale at its dispensaries are high quality products. The plan guarantees the safety, potency, stability, lifespan, and consistency among batches of the same product, whether as required by law or otherwise. The Applicant's plan for performing quality control and testing of qualified sampling of medical cannabis in its control will allow for the Applicant to provide the patients of Alabama with the safest and highest-quality products on the market. Finally, the narrative ends with the Applicant's plan for the return and remediation or destruction of failed test samples in compliance with the Act and the Commission's rules. The above plan demonstrates the Applicant's ability to ensure the safety, potency, stability, lifespan, and consistency among batches of medical cannabis that it plans to manufacture and dispense.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exhibit 40 – 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.

James Leventis, Esq.

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



Signature of Verifying Individual

12/25/2022

Verification Date

Introduction

The Applicant's *Contamination and Recall Plan* outlines the steps that will be followed in the event that one or more of its products, including any lots or batches thereof, is discovered to be contaminated and requires a recall. The plan accounts for the safety of employees and others on the premises, notification of proper authorities, proper disposal of contaminated or recalled cannabis and medical cannabis, steps to be taken for the preservation of cannabis or medical cannabis, and the reasonable efforts to maintain access to medical cannabis by those who depend on it.

40.1 Provisions for notifying the Originating Processor or Integrated Facility and any other licensee in the chain of custody of an adverse event:

The Applicant acknowledges that an “adverse event” means any health-related event in a person, which is associated with the use of a medical cannabis product, that is undesirable and is unexpected or unusual. The Applicant will promptly collect the data necessary to investigate the adverse event, Food and Drug Administration (FDA) approved reverse traceability software that aids in the tracking of corrective actions, including but not limited to: 1) Noting the patient who is reported to have experienced the adverse event; 2) Noting the initial reporter of the adverse event, or identifying that the initial reporter requests to remain anonymous; 3) Noting the name and address of the dispensary that sold the product and the date of sale; 4) Noting the identity of the specific medical cannabis product used, if known, including batch or lot number, and the name of the licensee that sold the product to the identifiable consumer; and 5) A description of the adverse event based on information received from the patient in (1), above, and the initial reporter in (2), above. The Applicant's Quality Director will review and approve the findings as to whether the complaint qualifies as an adverse event. If an adverse event is determined, then the next step is to notify the originating Processor or Integrated Facility and any other licensees in the chain of custody of an adverse event.

Within 24 hours of becoming aware of the adverse event, the Applicant will notify and report the adverse event issue, including all information and data collected, to: 1) the Commission;

2) the originating Processor or Integrated Facility; 3) all licensees who participated in the supply chain of the product involved in the adverse event or the products batch or lot; and 4) the local health department, if applicable. As an extra layer of assurance, the Applicant's internal communications architecture, internet website, and telephone system will be equipped to relay adverse event notifications from external sources and internal sources directly to the Quality Department in real time. The Applicant will keep a written record for at least five years of the complaint or adverse event and its investigation.

40.2 Factors about an adverse event that would likely necessitate a recall, and any potential for retesting or remediation:

The Applicant will conduct a recall if the following factors apply about an adverse event: 1) it discovers or receives written notice from the Commission that a recall is required; 2) arrives at an inconclusive or confirmatory determination of any adverse event or other complaint it receives; or 3) otherwise learns or has reasonable suspicion that any of its cannabis or medical cannabis products: a) may be unsafe for human consumption, b) fails to meet the potency requirements, c) contains inaccurate THC or CBD labeling concentrations, or d) fails any official tests and retests. If an initial assessment indicates a recall is necessary, the Applicant will initiate a recall. However, the Applicant will first determine if the product associated with the adverse event has the potential for retesting or remediation.

40.2.1 Potential for retesting and remediation

The Applicant will request a retest of any cannabis and medical cannabis product related to the adverse event that has been found to not be within proper testing parameters, in accordance with the procedures of **Rule 538-x-10-08-5.b**. If the Applicant has reason to believe a challenge of the test results is necessary, the Applicant will challenge the test results pursuant to the procedures outlined in **Rule 538-x-10-08-5.c**. In accordance with **Rule 538-x-10-08-2.a.**, the Applicant acknowledges that a batch that fails an official test may be remediated and retested upon the request of the Applicant. Any cannabis or medical cannabis that has failed an official test and retest by a State Testing Laboratory will be subjected to bring the cannabis or medical cannabis within appropriate testing ranges. Such

processes shall include those that change the form or chemical makeup of the regulated cannabis or medical cannabis (i.e., formal remediation), or not (i.e., decontamination), pursuant to **Rule 538-x-1-.04-49**.

Using the in-house testing laboratory as well as private unofficial testing by a State Testing Laboratory, the Applicant will perform tests and implement processes in an effort to bring non-compliant cannabis or medical cannabis within proper testing parameters prior to official testing by a State Testing Laboratory. The Applicant acknowledges that batch remediation effects a reset of the testing process: testing prior to remediation is not considered, but only the testing of the new, remediated batch, in accordance with **Rule 538-x-10-.08-5.d**. Thus, the Applicant will ensure that all sampling and testing of the remediated batch (including retesting and the challenging of test results) is done in compliance with the Act and the Commission's Rules. Barring contrary results based on a retest or challenge, if, upon retesting, a sample provided to a State Testing Laboratory sample fails the same official test, the Applicant will initiate a recall and destroy and dispose of the entire batch from which the sample was taken and document the destruction and disposal of the batch to the Statewide Seed-to-Sale Tracking System (METRC), in accordance with **Rule 538-x-10-.08-9**. If a sample provided to a State Testing Laboratory pursuant to this section passes the same official test upon retesting and tiebreak testing by a separate State Testing Laboratory, the Applicant need not destroy the entire batch; instead, the State Testing Laboratory shall clear the batch for further processing, packaging, labeling or sale, as appropriate, by means of certificate provided to the Applicant and a notation on METRC, pursuant to **Rule 538-x-10-.08-10**.

40.3 Responsible individuals or positions within the Applicant's organization who will oversee the recall process:

The **Chief Compliance Officer** will serve as the **Recall Coordinator**, who will oversee the investigation of the product complaint and identifying related batches that the complaint relates to. Once the recall is initiated, the Recall Coordinator will notify and assemble a cross-functional recall team, including the Recall Coordinator, **Quality Director**, and **Inventory Manager**. Additionally, the recall team will recruit, as needed, the Cultivation Director and

Processing Director to investigate all technical/biological aspects of the recall as it relates to their respective silos. The recall team is responsible for developing, implementing, and reevaluating recall processes and training, and conducting careful physical and digital documentation of all recall activity and communications.

40.4 Notification protocols to other licensees and the Commission through the Statewide Seed-to-Sale Tracking System:

Within 24 hours of initiating a recall, the Applicant will notify the Commission and other licensees through METRC. The recall notice issued by the Applicant will include at least the following information: 1) The reason for recall and related hazards, if any. If the medical cannabis is being removed for quality rather than health reasons, the notice may state that the medical cannabis does not meet internal company specifications and is being removed from distribution; 2) The category of medical cannabis product (e.g. oral tablets, gels, tinctures, transdermal patches, etc.); 3) Licensees that received the medical cannabis products; 4) The license number(s) and name(s), including trade name(s), of the licensee that cultivated or manufactured the product(s) subject to the recall; 5) Product description(s) for medical cannabis subject to the recall; 6) Batch or lot number(s) for the medical cannabis subject to the recall; 7) Expiration date(s) for the medical cannabis subject to the recall, if applicable; 8) Ship or transfer date(s) for the medical cannabis subject to the recall; and 9) Instructions regarding the disposition of the medical cannabis subject to the recall.

40.5 Processes to ensure that the recalled product is returned, remediated (and approved as safe), or destroyed:

40.5.1 Ensuring Recalled Product is Returned

The Applicant's will ensure that all recalled products are collected and returned from other licensees, patients, or caregivers who may have acquired the product.

determine the location of all recalled product and to track whether 100% of the recalled product has been returned.

40.5.2 Remediating Recalled Products

Upon approval from the Commission, the Applicant will attempt to remediate the recalled products and request in writing that a State Testing Laboratory retest the remediated batch, pursuant to **Rule 538-x-10-.08-5.d**. If the remediation plan is not approved by the Commission, the Applicant will then destroy the recalled product and failed test samples as described in *Section 40.5.3*.

The Applicant will ensure that all sampling and testing of the remediated batch (including retesting and the challenging of test results) is done in compliance with the Act and Chapter 10 of the Commission's rules. Barring contrary results based on a retest or challenge, if, upon retesting, a sample from the remediated batch provided to a State Testing Laboratory fails the same official test, the Applicant will destroy and dispose of the entire batch from which the sample was taken and document the destruction and disposal of the batch to METRC, in accordance with **Rule 538-x-10-.08-9**. If a sample from the remediated batch provided to a State Testing Laboratory pursuant to this section passes the official tests and is approved as safe, the Applicant need not destroy the entire batch; instead, the State Testing Laboratory shall clear the batch for further processing, packaging, labeling or sale, as appropriate, by means of certificate provided to the Applicant and a notation on METRC, pursuant to **Rule 538-x-10-.08-10**.

40.5.3 Destroying Recalled Products

All recalled product waste will be rendered unusable and unrecognizable through shredding and mixing using sophisticated machinery, which will destroy any cannabis and medical cannabis in such a way as to render the material unusable and unrecognizable, in accordance with **Rule 80-14-1-.11**. The Applicant's Recall Coordinator will oversee the destruction of all recalled medical cannabis products.

to render cannabis waste unusable by mixing the cannabis waste with 50% or greater of soil or other municipal waste. The Applicant will enter the destruction and disposal records into METRC, in accordance with **Rule 80-14-1-.11.**

40.6 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 Applicant will provide a recall report that includes a description of the recalled medical cannabis, crisis response, and steps taken to mitigate or avoid danger to the public to the following parties: 1) The Commission; 2) Department of Agriculture; 3) Local and state health departments; 4) Local and state police departments; and 5) Other regulatory bodies, as needed. More Specifically, the recall report will include the items outlined above in *Section 40.4*, plus the following information pertaining to crisis response and steps taken to avoid danger to the public: 1) Number of receiving licensees notified of the recall, the date and method of notification; 2) Number of receiving licensees who responded to the recall notice and both the quantity of affected medical cannabis in the possession of the licensee at the time of response, and quantity of affected medical cannabis returned; 3) Estimated time frame for completion of the recall; 4) Any notifications or statements surrounding the recall; 5) Any communications with the Commission, testing laboratories, or other licensees; 6) Any remedial measures the Applicant may deem are necessary to prevent future recalls; 7) Records of returned recalled medical cannabis; and 8) Detailed description of the steps taken in response to the recall, including: a) Assembling a recall team, b) Publicly communicating a recall, c) Identification of affected cannabis and medical cannabis products, d) Procedure for accepting returned recalled products, e) Quarantining recalled products, f) Remediation (if applicable), g) Destruction and disposal of recalled products, h) Avoiding further contamination, i) Protecting uncontaminated cannabis or medical cannabis products, j) Ensuring access to products by patients, k) Investigation of factors that led to recall, and l) Adjustments to internal protocols to avoid recurrence. To ensure accurate and timely communication, the Applicant will send the report to the Commission and other regulatory

bodies via e-mail and certified mail. The Applicant will also verify the receipt of such material via phone call and follow-up emails.

40.7 Steps to be taken to avoid further contamination, to preserve and protect uncontaminated cannabis or medical cannabis products, and to ensure access to said products by those who depend on it.

The Applicant will collect, store, and quarantine the recalled products and related batches in a separate secured storage area to protect usable medical cannabis products from contamination.

To further protect and preserve uncontaminated cannabis and medical cannabis, the Applicant will monitor its inventory to ensure that no products are spoiled or expired.

40.7.1 Ensuring Access to Said Product by Those Who Depend On It

40.9 Conclusion

With meticulous attention to detail, the Applicant addressed all items of Exhibit 40 and far exceeds the minimum required criteria to conduct an effective, thorough, and compliant recall, and thereby, protect the safety of medical cannabis patients in Alabama.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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License Type: Integrated Facility

Exhibit 41 – 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.

James A. Leventis

Printed Name of Verifying Individual

Chief Compliance Officer

Title of Verifying Individual

James A. Leventis

Signature of Verifying Individual

3/3/2023

Verification Date

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License Type: Integrated Facility

Introduction

The following narrative describes how the Applicant’s marketing and advertising will comply with the Act and the Commission Rules. As shown below, the Applicant provides compliant examples of the brands, marketing, and advertising to be utilized within Alabama.

Personnel - Marketing Director

The Applicant’s Marketing Director brings a decade of advertising and marketing experience managing public/media relations efforts, and visual merchandising at all retail locations. His previous clientele includes legendary brands Philips Norelco, Solo Cup, STARZ Entertainment, Nissan, and TransUnion. The Marketing Director will be responsible for all activities related to conceptualizing and implementing the Marketing and Advertising Plan compliant with the Commission’s and federal regulations, inclusive of public relations. Additional duties include business and market development; market research and planning; packaging and labeling compliance; and strategic direction for promotion and advertising.

41.1 Proposed Marketing and Advertising

In this section, the Applicant provides proposed logos, branding, messaging, and other marketing and advertising communications. Similarly, the Applicant provides examples of specific advertisements that comply with the Act and the Commission’s rules. But before the Applicant presents its proposed marketing and advertising, the Applicant will first discuss how its marketing and advertising comply with the Act and Commission’s rules.

The Applicant acknowledges that an advertisement is any written or verbal statement, illustration, or depiction created to induce sales using or a combination of letters, pictures, objects, sounds, lighting effects, illustrations, or other similar means. An advertisement includes but is not limited to brochures, promotional and other marketing materials, in accordance with **Rule 538-x-4-.17-1**. Similarly, the Applicant acknowledges that any advertisement likely to reach or appeal to minors is prohibited. The Applicant will ensure that, as exemplified below, any of its advertising or marketing campaigns related to or involving medical cannabis does not encourage, promote, or otherwise create any impression that cannabis is legal, therapeutic, or beneficial, except as specifically authorized

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by the Act and these Rules, pursuant to **Rule 538-x-4-.17-2**. The Applicant will not use a name, logo, sign, advertisement, or other marketing campaign or program unless the same, including all related materials, have been submitted to the Commission for approval, in accordance with **Rule 538-x-4-.17-3**.

The Applicant will, in accordance with **Rule 538-x-4-.17-6.**, ensure that any name, logo, sign, advertisement, or other marketing campaign or program of or on behalf the Applicant, regardless of the medium, must not: (a) Include reference to, or be accompanied by, any image bearing a resemblance to a cartoon character or of any individual (actual or fictional) more than fifteen percent (15%) of whose audience is, or should be reasonably anticipated to be, composed of minors; (b) Market, distribute, offer, sell, license, or cause to be marketed, distributed, offered, sold, or licensed, any apparel or other merchandise related to the sale of medical cannabis; (c) Suggest, by direct or indirect reference, a relationship to edibles (including candy, cookies, brownies, cakes, and the like) or beverages; (d) Include designs or other presentational effects that are commonly used to target minors; (e) Suggest or otherwise indicate that the product or entity in the advertisement has been approved or endorsed by the Commission, the State of Alabama or any person, entity or agency associated with the State of Alabama; (f) Advertise in a manner that is inconsistent with the medicinal and approved use of medical cannabis; and (g) Encourage the use of medical cannabis for a condition other than a qualifying medical condition.

As shown below in the exemplars, the Applicant will ensure that the name, logo, sign, advertisement, or other marketing campaign or program contain any statement, design, representation, picture, or illustration that contains or communicates: (1) False or misleading statements; (2) Names other than the registered name of the licensee's registered business name or an approved d/b/a, or the registered name of medical cannabis or related products; (3) A depiction of cannabis plants or any part thereof; (4) Slang terms and similar references, including words or depictions directly or indirectly referring to, unlicensed uses of cannabis; (5) Disparagement of a competitor's products; (6) Obscene, indecent, or profane statements or depictions; or (7) Statements as to the health benefits or therapeutic benefits of cannabis or medical cannabis, and statements as to the safety or efficacy of cannabis or medical cannabis unless supported by substantial clinical data.

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The Applicant current operates in seventeen states encompassing 125 dispensary locations and will have the following brands: Verano, Avexia, Zen Leaf, and MÜV.

41.1.1 Verano Brand

The Applicant’s namesake brand, Verano offers a purposeful, curated collection of medical products—all derived from the premium cannabis the Applicant thoughtfully cultivates in-house. The Verano brand approach is directly informed by the attitude and culture of Verano: Punching above its weight; undaunted by challenge; obsessed with quality; top-tier products; and in love with cannabis potential.



To prove that medical cannabis can and should be better, the Applicant has cultivated a premium flower, an inviting product line, and a personalized patient experience for newcomers and connoisseurs alike. And to prove that medical cannabis can and should do better, the Applicant is further democratizing and decriminalizing this industry, opening doors for limitless growth potential, and welcoming fellow visionaries to share in the success. With a purposeful, curated array of high-end products derived from premium flower—thoughtfully cultivated in-house—patients can always rely on the Applicant’s relentless dedication to quality.



The best of the best hold themselves with an unmistakable confidence, their determination and poise conspiring to craft entirely new definitions of greatness. The logomark reflects that courage, assertively visualizing the frank values of Verano.

Verano encourages responsible consumption of medical cannabis. To support that effort, the Applicant follows all existing regulatory standards in marketing and communications. More than that, the Applicant will go above and beyond in efforts to responsibly communicate, educate, and promote. On the right is an example of a proposed advertisement by Verano.

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41.1.2 Avexia Brand

The Applicant’s goal is to build Avexia as its own unique, elevated, wellness brand, under the trusted Verano umbrella. Blending THC with customized blends of CBD, CBN, and CBG for targeted relief, Avexia offers pure, plant-powered wellness.



Whether patients seek to integrate a new healing ritual into their daily routine, discover a luxurious mind-body escape, or simply soothe what ails you; Avexia’s cannabis lotions, body balms, bath soaks, and microdosing tablets can



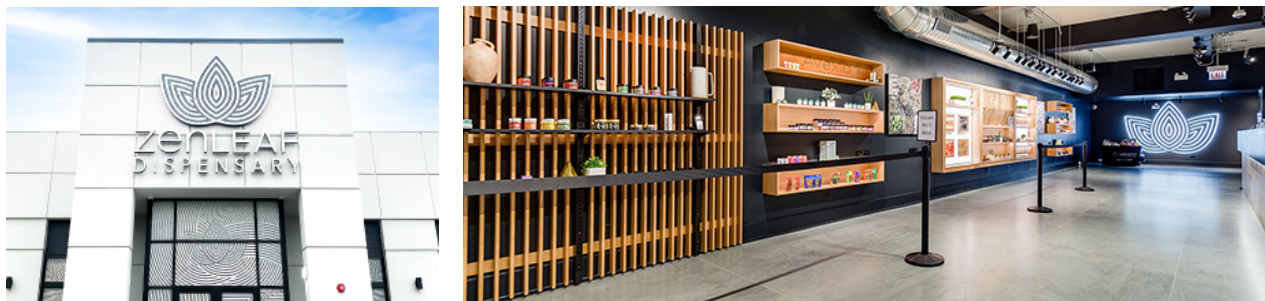
elevate self-care practice and help sustain well-being. The proposed logo of the Avexia brand is shown below. Below are further examples of marketing materials from the Avexia brand.

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41.1.3 Zen Leaf Brand

Zen Leaf is the brand that the Applicant's medical cannabis dispensaries will operate under. The first Zen Leaf dispensary opened its doors to the city of Las Vegas back in 2016. It was, and to this day remains, a priority that Zen Leaf dispensaries be a place of both comfort and care. Clean lines, soft textures and soothing glows define the interiors. Order and efficiency inform the process. Attentiveness and compassion drive the teams.



Zen Leaf brand is dedicated to serving the local community and providing patients with a better quality of life through access to medical cannabis. At Zen Leaf, the Applicant strives to improve the health of patients by sharing the science behind medical cannabis and a dedication to providing patients with top quality medical cannabis products and educational materials.

The Zen Leaf Philosophy: The Applicant recognizes people are wonderfully unique, as are their medical cannabis needs. In pursuit of wellness, Zen Leaf Wellness Advisors cater to the individual, asking questions, listening attentively, and offering thoughtful recommendations. Zen Leaf dispensaries are designed for comfort, care, and privacy, as cannabis shopping should be easy and enjoyable. The Zen Leaf focus will always be the wellness and satisfaction of the user.

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41.1.4 MÜV Brand

MÜV makes cannabis-based medicine. In awe of the healing powers of this plant, we tapped top cannabinoid scientists and researchers to develop the MÜV medicinal cannabis line. Fueled by expertise, ingenuity, and a relentless dedication to quality, MÜV offers cannabis flower, vapes, extracts, topicals, concentrates, distillates, inhalers, patches, and tinctures to help you feel better. Pharmaceutical precision: Always crafted with the highest GFSI-certified quality standards; Offering



20% OFF
TRANSDERMAL
PATCH
ENCAPS 1:1 FORMULATION
January 3-4

time-released THC/CBD with our patent award-winning EnCaps technology; Delivering targeted treatment with our ultra-discreet, comfortably familiar cannabis



inhalers; and made from cold ethanol-extracted concentrates to preserve the quality of naturally occurring cannabinoids, terpenes, and flavonoids. To the left is an in-house example of the Applicant’s advertisement.

41.2 Any specific media outlets or platforms where the marketing or advertising campaigns or programs will be utilized.

The Applicant will not place or maintain, or cause to be placed or maintained, an advertisement of medical cannabis or any related product, in compliance with the restrictions outlined in **Rule 538-x-4-.17-5** and **Rule 80-14-1-.18**. Similarly, in accordance with **Rule 538-x-4-.17-8.**, for all marketing and advertising, the Applicant will not do any of the following: (a) Display external signage larger than sixteen inches in height by eighteen inches in width that is not attached to the entity's permanent structure or vehicle; (b) Illuminate a sign advertising a medical cannabis product or strain at any time; (c) Sell or otherwise distribute clothing, apparel, or wearable accessories, unless such sale or distribution is to an employee for purposes of

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identification while at the licensed facility; (d) Advertise medical cannabis brand names or utilize graphics related to medical marijuana on the exterior of any building or vehicle operated by the licensee; and (e) Display medical marijuana, medical marijuana products, or medical marijuana paraphernalia that is visible from the exterior of the facility.

The Applicant acknowledges that the above Rule, as it pertains to advertisements, does not apply to noncommercial messages, i.e., the content of which is primarily for charitable, educational, or public service purposes and does not overtly seek profit or promote the licensee or its products, pursuant to **Rule 538-x-4-.17-9**. Thus, the Applicant's marketing containing non-commercial messages will occur on internet-based platforms including websites and social media. As such, the Applicant has developed a website and established a web presence advertising the name, business address, contact information, and services to be provided by the Applicant that complies with **Rule 538-x-4-.17-7**. The Applicant's website requires each user's affirmation that the user is not a minor before access to the website is granted. The Applicant will meticulously monitor and has ensured that its web presence remains compliant with **Rule 538-x-4-.17-7.a. – e**.

41.3 Media outlets and third-party entities for marketing and advertising

The Applicant has existing relationships with the following third-party entities who will play a role in the Applicant's marketing and advertising efforts:

See attached first page of the contracts between the Applicant and such media outlets and third-party entities (identified as "First page of contracts with Media Outlets and Third-Party Entities – Attachment to Exhibit 41, Section 41.3").

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41.4 Proposed Packaging

Below are virtual renderings of all packaging to be provided by the Applicant, demonstrating the size, color, logo, artwork, or statements appearing on the packaging, as well as all child-resistant, tamper-evident, or other safety features, demonstrating conformity with the Act and the AMCC Rules. Additionally, the Applicant provides exemplars of all proposed labeling, including labels on packaging, on containers and any inserts to be included in any packages, demonstrating conformity with the Act and the AMCC Rules. As will be shown below, the Applicant’s proposed packaging and labeling will comply with all the requirements of **Rule 538-x-6-.05**. All proposed packaging shown below are child-resistant, tamper-evident, identify the Processor and type of product, not attractive to minors, designed to minimize appeal to children, and do not contain any false statement or statement that advertises health benefits or therapeutic benefits of medical cannabis.

41.4.1 MUV Topical and Capsules

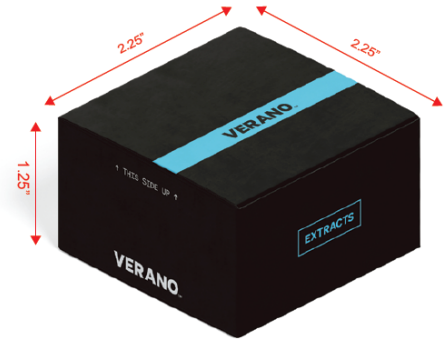


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41.4.2 Nebulizers

The Verano Reserve Extracts will go into a small glass jar with a child resistant push and turn lid. The glass jar will go into a box that will have one of the labels below that will display the state disclaimers / analysis info, along with a built-in perforated tamper proof tab that will secure the box to remain closed. Extracts can be consumed using a nebulizer.



41.4.3 Tincture and Topical Packaging



1.25"

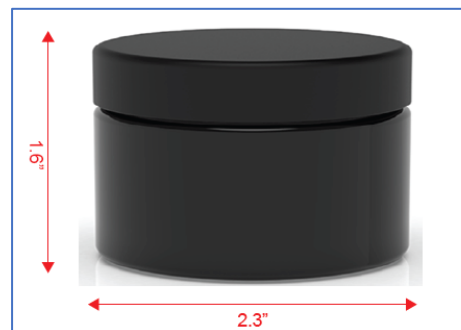
4"



The tincture will go into this child resistant dropper bottle with a push and turn cap



The Pain Relief Balm will go into this child resistant pump tube with a push and turn lid



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41.4.4 Tablets and Lavendar Bath Soak Packaging



41.4.5 Suppositories and Non-sugarcoated Lozenges Packaging



41.5 Proposed Labeling

All labels comply with **Rule 538-x-6-.05-2** and are: 1) securely attached to or imprinted on the accompanying packaging, 2) clear and contain print of a size and quality so as to be legible to the average patient or caregiver with a sixth-grade education, 3) identify the type of product (pills, tinctures, transdermal patches, etc.), 4) contain lot and batch numbers, 5) contain the name of and a license identification number for the Cultivator and Processor, 6) identify the cannabinoid content and potency of the product, 7) identify the amount, number or count of the product in the package on which they are attached, 8) contain the universal state symbol approved by the Commission, printed in color at least one-half inch by one-half inch in size, 9) contain the words “Keep out of reach of children.”, 10) contain a digital image or QR Code for purposes of tracking medical cannabis products and must interface with the Statewide Seed-to-Sale Tracking System, 11) contain packaging insert warning label, 12) not

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attractive to minors, 13) contain any false statement or statement that advertises health benefits or therapeutic benefits of medical cannabis.

In addition, at the time of labeling, must provide QR Coding or other approved digital coding to identify, at a minimum, the following: (1) The Cultivator or Integrated Facility, by facility, from which the medical cannabis was sourced, (2) The name of the Processor and the Processor’s facility of origin, (3) The type of product, (4)The date of processing and packaging, (5) The date of the Processor’s State Testing Laboratory approval, (6) The expiration date (or, if no expiration date, a notation that the expiration date does not apply), and (7) The Alabama Poison Control contact information as provided on the AMCC website.

As for **Rule 538-x-6-.05-.2.1**, pictured right is an example of the safety inserts to be included in packages.

WARNING: This product may make you drowsy or dizzy. Do not drink alcohol with this product. Use care when operating a vehicle or other machinery. Taking this product with medication may lead to harmful side effects or complications. Consult your physician before taking this product with any medication. Women who are breastfeeding, pregnant, or plan to become pregnant should discuss medical cannabis use with their physicians.



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1.75"

5.25"

0.5"

0.5"

0.5"

THC

Avexia
of the elements

peach tincture
100mg thc

Ingredients: MCT oil, activated cannabis oil, natural flavor, ashwagandha extract

[eveksi:a]

1.72"

5.25"

0.5"

0.5"

0.5"

THC

Avexia
of the elements

ascend 1:1 cbg:thc

2.5mg cbg + 2.5mg thc each
100mg cbg + 100mg thc total
40 micro-dose tablets

[eveksi:a]

1.3734"

7.3"

0.5"

0.5"

0.5"

THC

Avexia
of the elements

relief balm 100mg thc + 100mg cbd

[eveksi:a]

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DO NOT USE IF SEAL IS BROKEN.
verano.com

FOR TOPICAL (EXTERNAL) USE ONLY.

Store in cool, dry place.

This product was produced in a facility that may process other products and may contain nuts, soy, dairy, wheat or gluten.

Avexia™ of the elements
lavender bath soak 100mg thc

Ingredients: sea salt, lavender, vegetable glycerin, tocopherol (vitamin E), sunflower oil, jojoba oil, activated cannabis oil, argan oil, aloe vera leaf juice, ultramarine violet

Directions: As you draw the bath, add half the contents of this container. You may carefully increase that amount as needed. Use one-quarter of this container for soaking just hands or feet. Shake well before use.

[eveksi:a]

2.82"

7.3"

DO NOT USE IF SEAL IS BROKEN.
verano.com

Suppositories

Avexia™ of the elements
suppositories thc

INGREDIENTS: cocoa butter, polyethylene glycol, cannabis oil, hydrogels, and glycerinated gelatin

WARNING: This product may make you drowsy or dizzy. Do not drink alcohol with this product. Use care when operating a vehicle or other machinery. Taking this product with medication may lead to harmful side effects or complications. Consult your physician before taking this product with any medication. Women who are breastfeeding, pregnant, or plan to become pregnant should discuss medical cannabis use with their physicians.

2.5mg thc each
100mg thc total

40 suppositories

Keep out of reach of children.
Take one tablet by mouth

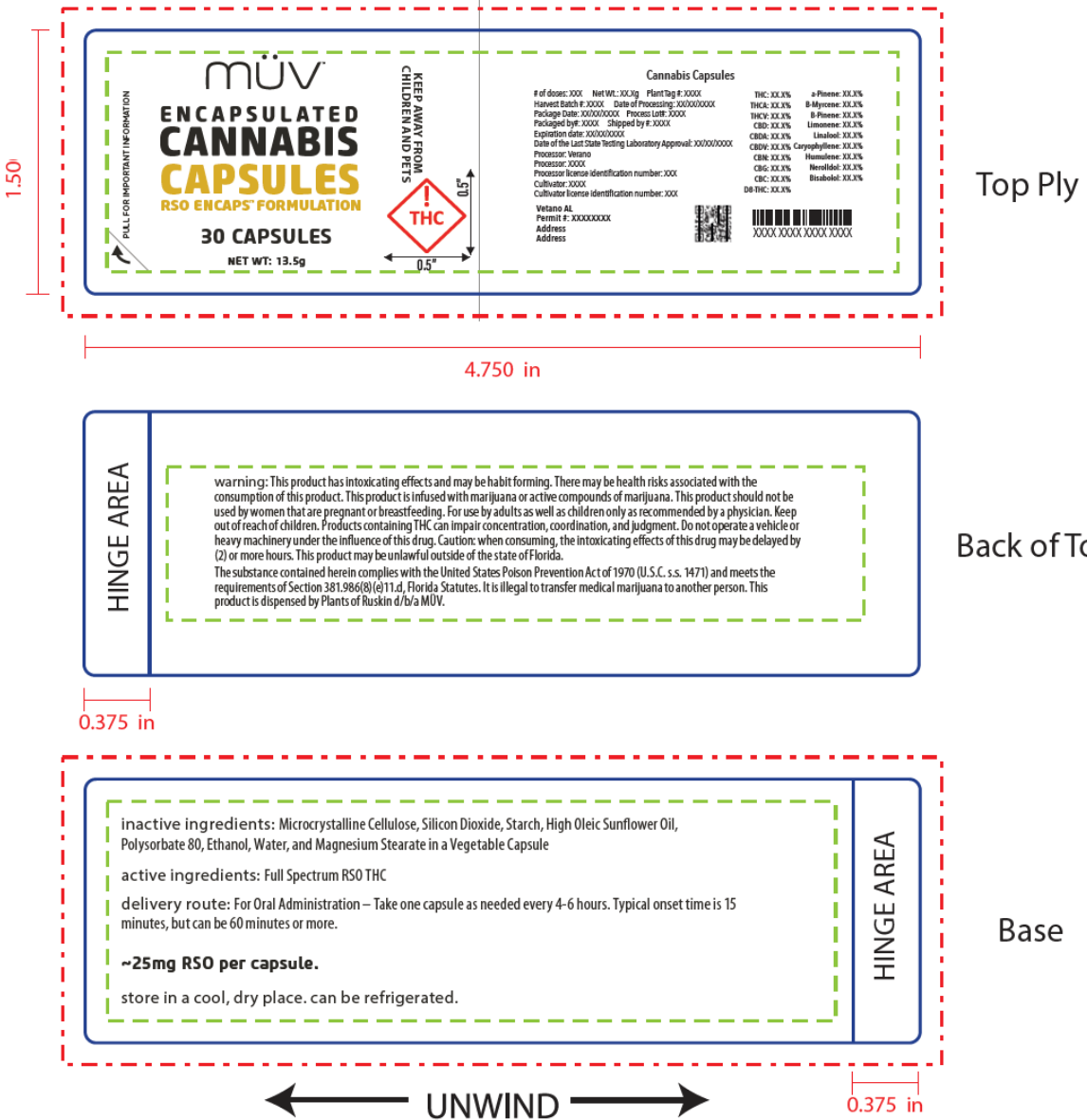
[eveksi:a]

1.72"

5.25"

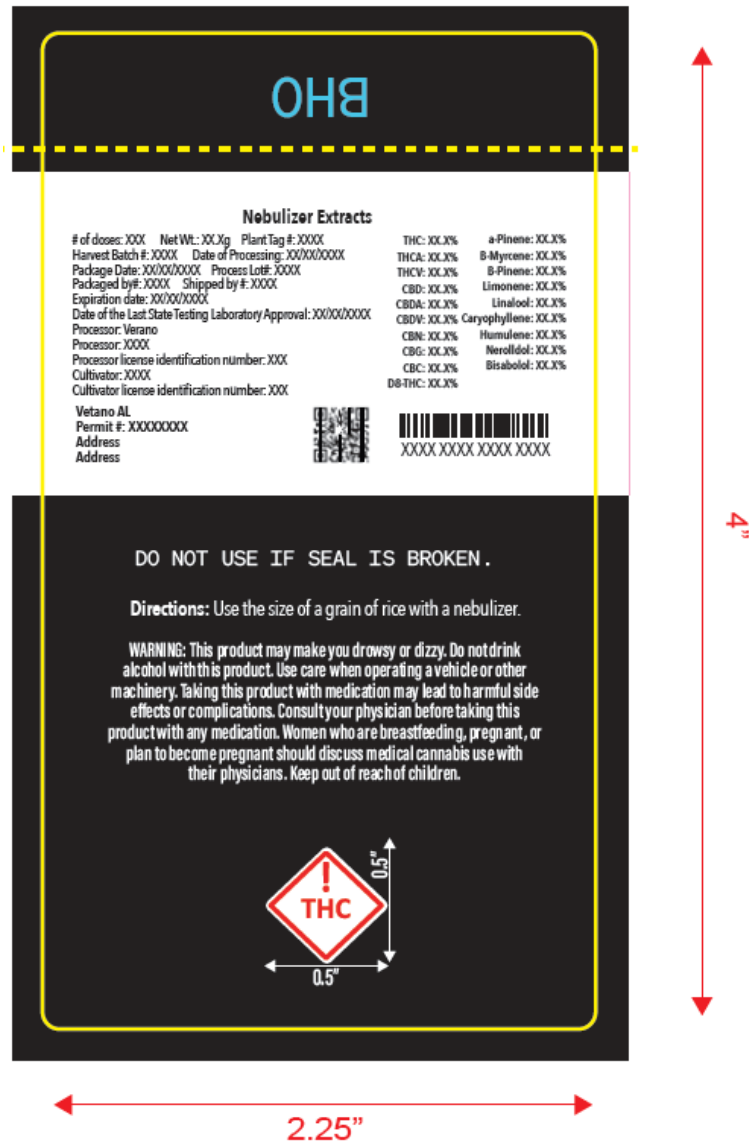
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License Type: Integrated Facility



41.6 Conclusion

As displayed above, the Applicant’s plans for marketing and advertising involves word-class brands that are compliant with the Act and the Commission’s rules. In addition, the Applicant meticulously outlined the platforms and media outlets where the marketing and advertising will occur, as well as entities projected to play a role in the Applicant’s marketing and advertising. Lastly, the Applicant provided proposed packaging and labeling that complies with **Rule, 538-x-6-.05**, thereby far exceeding the required criteria of Exhibit 41.

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First Page of Contracts with Media Outlets and Third-Party Entities - Attachment to Exhibit 41, Section 41.3

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

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1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
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Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
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Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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Within and Transportation Between Facilities			
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Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Confidential – Exempt from Public Disclosure

License Type: Integrated Facility


Exhibit 42 – 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.

James A. Leventis
Printed Name of Verifying Individual

Chief Compliance Officer
Title of Verifying Individual


Signature of Verifying Individual

3/3/2023
Verification Date

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Introduction

Below, the Applicant provides a complete site map of each website owned or operated by the Applicant. Additionally, the Applicant provides web address of each webpage, social media page, or other online site owned or operated by the Applicant.

Pursuant to **Rule 538-x-4-17-7.**, the Applicant has developed a website and established a web presence advertising the name, business address, contact information, and services provided by the licensee. The Applicant's website requires each user's affirmation that the user is at least 21 years old before access to the website is granted (as shown on the right). The Applicant's website does not: (a) allow for direct engagement between or among consumers or consumer-generated content including but not limited to consumer reviews or testimonials; notwithstanding the foregoing, licensees are not prohibited from seeking or obtaining direct patient feedback or sharing actual unsolicited statements made by consumers to the licensee, so long as the content of the statement does not otherwise violate any prohibitions contained in this Rule; (b) Provide a medium for website users to transmit website content to minors; (c) Target a consumer group with a high likelihood of reaching or appealing to minors; (d) Display or otherwise post content that has not been submitted to the Commission under paragraph 4 of **Rule 538-x-4-17.**, if such content has been created or produced within Alabama or is specifically targeted to or available only to Alabama residents; (e) Transact business or otherwise facilitate a sales transaction to consumers or businesses; or (f) Maintain a web presence that would otherwise violate the Act or these Rules. The Applicant currently owns and operates the following website under its registered trade name in Alabama (currently set as private, inaccessible to the public and will be published upon issuance of license):



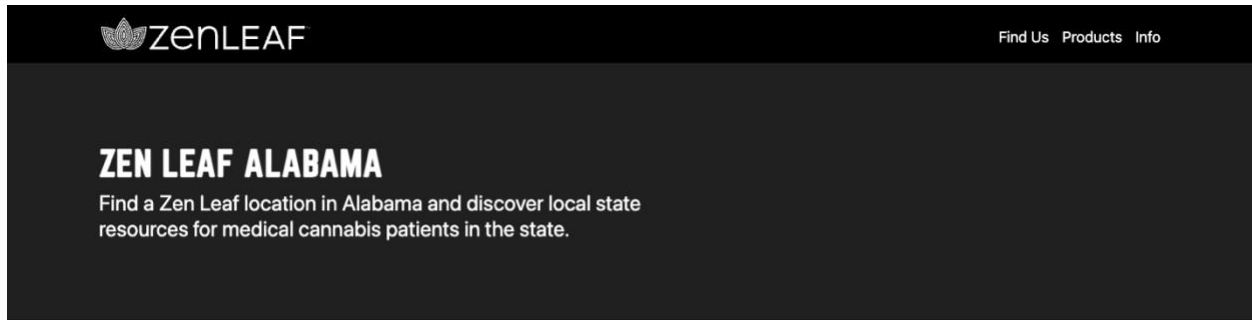
WELCOME TO ZEN LEAF ALABAMA

Are you at least 21 years old?*

YES

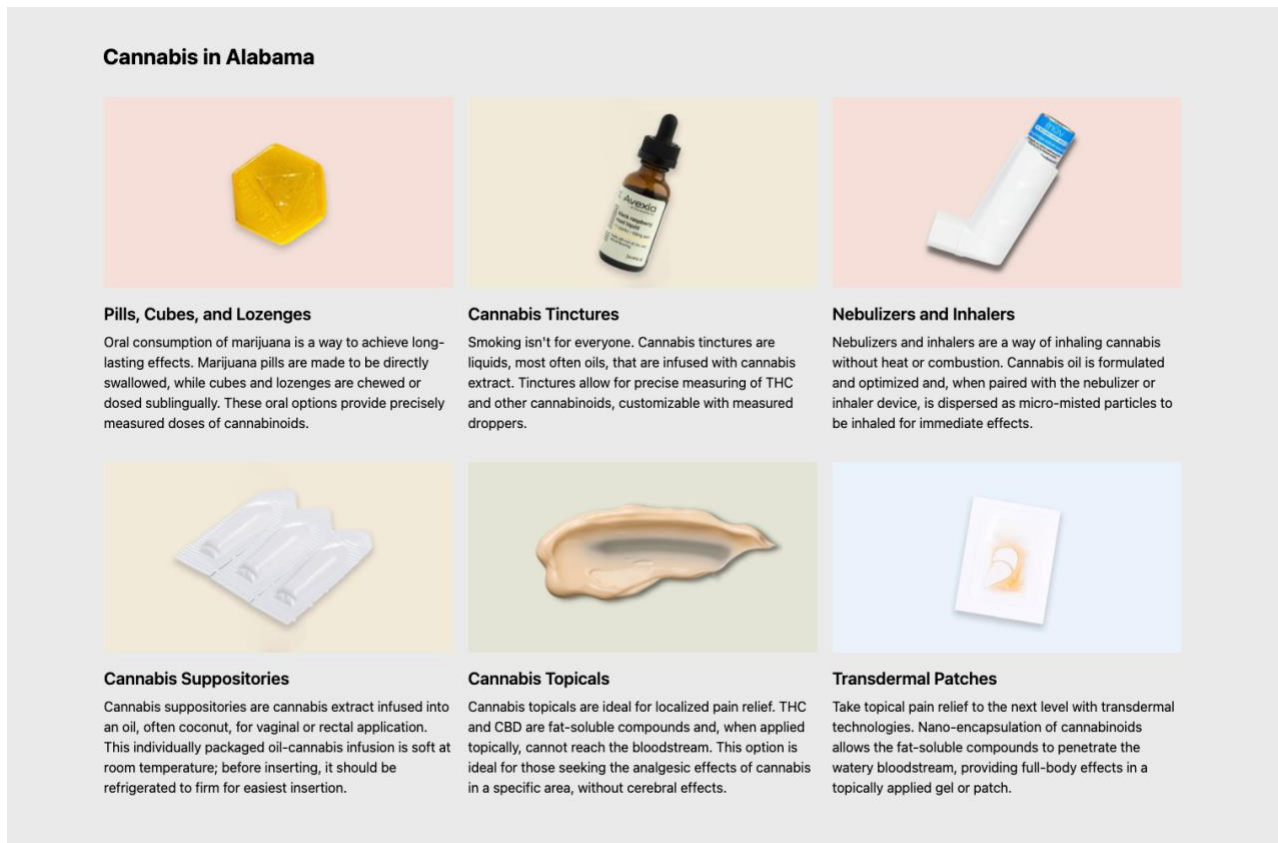
NO

By clicking "YES" and entering this website, you agree to be bound by the [Terms of Service & Privacy Policy](#).



The banner features the Zen Leaf logo in the top left corner, with the text "ZEN LEAF ALABAMA" in large, bold, white letters. Below the logo, it says "Find Us Products Info". The main text reads: "ZEN LEAF ALABAMA Find a Zen Leaf location in Alabama and discover local state resources for medical cannabis patients in the state."

All Zen Leaf Dispensary Locations in Alabama



The infographic is titled "Cannabis in Alabama" and is divided into six sections, each with an image and a text description:

- Pills, Cubes, and Lozenges:** Image of a yellow cube. Text: "Oral consumption of marijuana is a way to achieve long-lasting effects. Marijuana pills are made to be directly swallowed, while cubes and lozenges are chewed or dosed sublingually. These oral options provide precisely measured doses of cannabinoids."
- Cannabis Tinctures:** Image of a small brown bottle with a dropper. Text: "Smoking isn't for everyone. Cannabis tinctures are liquids, most often oils, that are infused with cannabis extract. Tinctures allow for precise measuring of THC and other cannabinoids, customizable with measured droppers."
- Nebulizers and Inhalers:** Image of a white nebulizer device. Text: "Nebulizers and inhalers are a way of inhaling cannabis without heat or combustion. Cannabis oil is formulated and optimized and, when paired with the nebulizer or inhaler device, is dispersed as micro-misted particles to be inhaled for immediate effects."
- Cannabis Suppositories:** Image of three white suppositories in their packaging. Text: "Cannabis suppositories are cannabis extract infused into an oil, often coconut, for vaginal or rectal application. This individually packaged oil-cannabis infusion is soft at room temperature; before inserting, it should be refrigerated to firm for easiest insertion."
- Cannabis Topicals:** Image of a dollop of orange-brown cream. Text: "Cannabis topicals are ideal for localized pain relief. THC and CBD are fat-soluble compounds and, when applied topically, cannot reach the bloodstream. This option is ideal for those seeking the analgesic effects of cannabis in a specific area, without cerebral effects."
- Transdermal Patches:** Image of a white patch with a circular opening. Text: "Take topical pain relief to the next level with transdermal technologies. Nano-encapsulation of cannabinoids allows the fat-soluble compounds to penetrate the watery bloodstream, providing full-body effects in a topically applied gel or patch."

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License Type: Integrated Facility

Get Your Alabama Medical Marijuana Card

Are you ready to apply for a medical marijuana card in Alabama? Looking to learn more about qualifying conditions, purchase limits, and fees? We are here to help. Request assistance applying for a medical cannabis card, renewing your card, and more via our secure form.

MEDICAL CARD ASSISTANCE

Frequently Asked Questions About Cannabis in Alabama

- When Did Cannabis Become Legal in Alabama?
- How Do I Become an AL Medical Cannabis Patient?
- What are the Qualifying Conditions for AL Medical Cannabis?
- Are Edibles Legal in Alabama?
- Is Recreational Cannabis Legal in AL?



[Accessibility](#) | [Privacy Policy](#) | [HIPAA](#) | [Terms of Use](#)

©2022 Zen Leaf. All Rights Reserved

Sorry, we're offline.

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License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

Confidential –Exempt from Public Disclosure

License Type: Integrated Facility

This is the only website that the Applicant will use within Alabama. However, the Applicant's parent company, Verano, owns and operates the websites shown on the right. While the websites shown on the right will not be owned or operated by the Applicant, they serve as

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License Type: Integrated Facility

an example of the caliber and quality of the websites that the Applicant’s marketing team can produce and operate, while remaining compliant.

Verano Website Portfolio & Sitemaps

Verano owns and operates the following websites for our parent company, dispensaries and product brands.



Verano Consumer Site
<https://verano.com>

Verano Investors
<https://investors.verano.com>

Dispensaries



Zen Leaf
<https://zenleafdispensaries.com>

Zen Leaf Ohio
<https://oh.zenleafdispensaries.com>



MUV Florida
<https://muvfl.com>

42.1 Site Maps

Here is a complete site map of the only website owned or operated by the Applicant:

Product Brands



Hi-Klas
<https://hi-klas.com>



Vital Height
<https://vitalheights.com>



Bits
<https://bits.verano.com>

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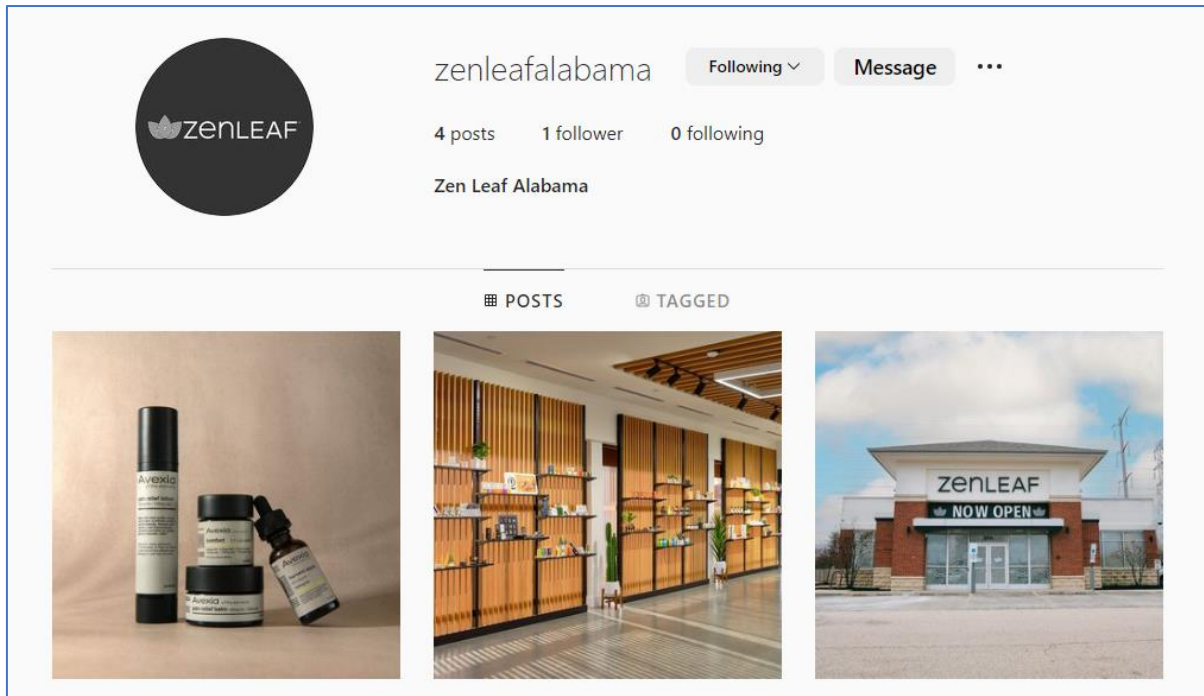
License Type: Integrated Facility

42.2 Webpage, Social media page, or other online sites

The web addresses of each webpage and social media page owned or operated by the Applicant are found below. The Applicant does not own or operate any additional online sites:

- Webpage: <https://al.zenleafdispensaries.com/>
- Facebook (Social Media): <https://www.facebook.com/ZenLeafAlabama/>
- Instagram (Social Media): <https://www.instagram.com/zenleafalabama/>

The Applicant's has changed the settings on its Facebook and Instagram account to comply with **Rule 538-x-4-17-7**. More specifically, the Applicant's accounts are private to minors, comments/sharing has been disabled, and do not allow business transactions.



Conclusion

As demonstrated above, the Applicant has developed and will maintain a website and social media accounts that benefits the patients of Alabama, comply with **Rule 538-x-4-17**, and far exceed the requirements of Exhibit 42.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
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Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
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CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

12/21/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER	CONTACT NAME:	
	PHONE (A/C, No, Ext):	FAX (A/C, No):
	E-MAIL ADDRESS:	
INSURER(S) AFFORDING COVERAGE		NAIC #
INSURED VZL Staffing Services, LLC; Verano Holdings, LLC 415 N. Dearborn St 4th Floor Chicago, IL 60654	INSURER A :	
	INSURER B :	
	INSURER C :	
	INSURER D :	
	INSURER E :	
	INSURER F :	

COVERAGES

CERTIFICATE NUMBER:

REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
	COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PROJECT <input type="checkbox"/> LOC OTHER:						EACH OCCURRENCE \$ DAMAGE TO RENTED PREMISES (Ea occurrence) \$ MED EXP (Any one person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS - COMP/OP AGG \$ \$
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED <input type="checkbox"/> RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$ \$
A	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) <input type="checkbox"/> Y / N If yes, describe under DESCRIPTION OF OPERATIONS below		N / A	VZWC310737	10/24/2022	10/24/2023	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ 1,000,000 E.L. DISEASE - EA EMPLOYEE \$ 1,000,000 E.L. DISEASE - POLICY LIMIT \$ 1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

State of Alabama included
 Verano Alabama, LLC

CERTIFICATE HOLDER

CANCELLATION

State of Alabama	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE

November 10th, 2022

Re: Letter of Intent

To Whom it May Concern:

Verano Alabama, LLC and their scheduled vehicles to our policy. Attached is a copy of the Declarations page.

Sincerely,

RENEWAL NUMBER _____
 CROSS REFERENCE NUMBER _____

The Declarations include a second part designated "Part 2".

BUSINESS AUTO COVERAGE DECLARATIONS

Producer

ITEM ONE NAMED INSURED & ADDRESS

VERANO HOLDINGS LLC
(SEE IL-1204 FOR ADDITIONAL NAMED INSUREDS)
415 N DEARBORN AVE 4TH FLR
CHICAGO, IL 60654

FORM OF NAMED INSURED'S BUSINESS: **LLC**
 NAMED INSURED'S BUSINESS: **CANNABIS DISPENSARY**

POLICY PERIOD: Policy covers FROM **04/05/2022 12:01 AM** TO **04/05/2023** 12:01 A.M. Standard Time at the Named Insured's Address stated above.

ITEM TWO - SCHEDULE OF COVERAGES AND COVERED AUTOS

This policy provides only those coverages where a charge is shown in the premium column below. Each of these coverages will apply only to those "autos" shown as covered "autos". "Autos" are shown as covered "autos" for a particular coverage by the entry of one or more of the symbols from the COVERED AUTO Section of the Business Auto Coverage Form next to the name of the coverage .

COVERAGES	COVERED AUTOS (Entry of one or more of the symbols from the COVERED AUTOS Section of the Business Auto Coverage Form shows which autos are covered autos)	LIMIT OF INSURANCE THE MOST WE WILL PAY FOR ANY ONE ACCIDENT OR LOSS	PREMIUM
LIABILITY		\$ 1,000,000 CSL	
PERSONAL INJURY PROTECTION (P.I.P.) (or equivalent No-fault coverage)		SEPARATELY STATED IN EACH P.I.P. ENDORSEMENT MINUS Deductible	
ADDED P.I.P. (or equivalent added No-fault cov.)		SEPARATELY STATED IN EACH ADDED P.I.P. ENDORSEMENT	
PROPERTY PROTECTION INSURANCE (P.P.I.) (Michigan only)		SEPARATELY STATED IN THE P.P.I. ENDORSEMENT MINUS Deductible FOR EACH ACCIDENT	
AUTO MEDICAL PAYMENTS		\$ 5,000	
UNINSURED MOTORISTS		\$ 1,000,000 CSL (BI Only)	
UNDERINSURED MOTORISTS (when not included in Uninsured Motorists coverage)		\$ 1,000,000 CSL (BI Only)	
PHYSICAL DAMAGE INSURANCE			
COMPREHENSIVE COVERAGE		\$ See M 5064 (04/2012)	
SPECIFIED CAUSES OF LOSS		\$	
COLLISION COVERAGE		\$ See M 5064 (04/2012)	
TOWING AND LABOR		\$ Deductible FOR EACH COVERED AUTO	
FORMS AND ENDORSEMENTS CONTAINED IN THIS POLICY AT ITS INCEPTION See M4572 (12/1994)		PREMIUM FOR ENDORSEMENTS	
		ESTIMATED TOTAL PREMIUM	
ENTER SYMBOL 10 DESCRIPTION HERE: Symbol 10 - Only those autos described in Item Three of the Declarations with Liability premium shown.			
POLICY SUBJECT TO A FULLY EARNED POLICYWRITING MINIMUM PREMIUM OF \$		0	IF CANCELLED BY THE INSURED.
ITEM THREE - SCHEDULE OF COVERED AUTOS		AS ATTACHED	

Countersigned At _____ By _____ AUTHORIZED SIGNATURE

In Witness whereof, we have caused this policy to be executed and attested.

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

ILLINOIS POLICY CHANGES

This endorsement will not be used to decrease coverages, increase rates or deductibles or alter any terms or conditions of coverage unless at the sole request of the insured.

Effective Date of Change: **12/12/2022 12:03PM**
 Change Endorsement No.: **48**
 Named Insured: **VERANO HOLDINGS LLC**

The following item(s):

<input type="checkbox"/>	Insured's Name	<input type="checkbox"/>	Insured's Mailing Address
<input type="checkbox"/>	Policy Number	<input type="checkbox"/>	Company
<input type="checkbox"/>	Effective/Expiration Date	<input type="checkbox"/>	Insured's Legal Status/Business of Insured
<input type="checkbox"/>	Payment Plan	<input type="checkbox"/>	Premium Determination
<input type="checkbox"/>	Additional Interested Parties	<input type="checkbox"/>	Coverage Forms and Endorsements
<input checked="" type="checkbox"/>	Limits/Exposures	<input type="checkbox"/>	Deductibles
<input type="checkbox"/>	Covered Property/Located Description	<input type="checkbox"/>	Classification/Class Codes
<input type="checkbox"/>	Rates	<input type="checkbox"/>	Underlying Insurance

is (are) changed to read **{See Additional Page(s)}**:

See attached pages of this endorsement.

Prorate Factor: 0.312

The above amendments result in a change in the premium as follows:

<input type="checkbox"/>	NO CHANGES	<input type="checkbox"/>	TO BE ADJUSTED AT AUDIT	ADDITIONAL PREMIUM	RETURN PREMIUM
				\$	\$

Countersigned By:

(Authorized Agent)

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

Policy Number:

POLICY CHANGES ENDORSEMENT DESCRIPTION

In consideration of an additional premium shown below, the policy

EXTENDS to cover the following vehicles.

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))

Policy Number:

POLICY CHANGES ENDORSEMENT DESCRIPTION

In consideration of an additional premium shown below, the policy

EXTENDS to cover the following vehicles.



POLICY NUMBER:

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

ILLINOIS POLICY CHANGES

This endorsement will not be used to decrease coverages, increase rates or deductibles or alter any terms or conditions of coverage unless at the sole request of the insured.

Effective Date of Change:

Change Endorsement No.:

Named Insured: **VERANO HOLDINGS LLC**

The following item(s):

<input type="checkbox"/>	Insured's Name	<input type="checkbox"/>	Insured's Mailing Address
<input type="checkbox"/>	Policy Number	<input type="checkbox"/>	Company
<input type="checkbox"/>	Effective/Expiration Date	<input type="checkbox"/>	Insured's Legal Status/Business of Insured
<input type="checkbox"/>	Payment Plan	<input type="checkbox"/>	Premium Determination
<input type="checkbox"/>	Additional Interested Parties	<input type="checkbox"/>	Coverage Forms and Endorsements
<input type="checkbox"/>	Limits/Exposures	<input type="checkbox"/>	Deductibles
<input type="checkbox"/>	Covered Property/Located Description	<input type="checkbox"/>	Classification/Class Codes
<input type="checkbox"/>		<input type="checkbox"/>	Underlying Insurance

is (are) changed to read **{See Additional Page(s)}**:

See page 2 of this endorsement.

The above amendments result in a change in the premium as follows:

<input checked="" type="checkbox"/>	NO CHANGES	<input type="checkbox"/>	TO BE ADJUSTED AT AUDIT	ADDITIONAL PREMIUM	RETURN PREMIUM
				\$	\$

Countersigned By:

(Authorized Agent)

Policy Number:

POLICY CHANGES ENDORSEMENT DESCRIPTION
IT IS HEREBY UNDERSTOOD AND AGREED THAT THE FOLLOWING ENTITY IS ADDED AS A NAMED INSUERD. VERANO ALABAMA, LLC



September 1, 2022

Alabama Medical Cannabis Commission

P.O. Box 309585

Montgomery, AL 36130

To whom it may concern:

This letter serves to confirm our intent to provide coverage for **Verano Alabama, LLC** pursuant to the insured's Alabama Cannabis license application:

- Product Liability
 - \$5,000,000 Per Occurrence; \$5,000,000 Aggregate
- General Liability
 - \$5,000,000 Per Occurrence; \$5,000,000 Aggregate

Should you have any questions, please contact the QuadScore underwriter:

POLICY NUMBER:

COMMERCIAL GENERAL LIABILITY

COMMERCIAL GENERAL LIABILITY DECLARATIONS

NAMED INSURED: <u>Verano Holdings, LLC; Ataraxia, LLC; Albion, LLC; TAB Management; ILMM Logistics, LLC; VZL Staffing Services, LLC</u>	
MAILING ADDRESS: <u>415 N DEARBORN STREET, CHICAGO, IL 60654</u>	
POLICY PERIOD: FROM <u>8/10/2022</u> TO <u>8/10/2023</u> AT 12:01 A.M. TIME AT YOUR MAILING ADDRESS SHOWN ABOVE	

IN RETURN FOR THE PAYMENT OF THE PREMIUM, AND SUBJECT TO ALL THE TERMS OF THIS POLICY, WE AGREE WITH YOU TO PROVIDE THE INSURANCE AS STATED IN THIS POLICY.

LIMITS OF INSURANCE	
EACH OCCURRENCE LIMIT	\$10,000,000
GENERAL AGGREGATE LIMIT	\$10,000,000
PRODUCTS & COMPLETED OPERATIONS:	EXCLUDED
PERSONAL & ADVERTISING INJURY LIMIT:	\$1,000,000
DAMAGE TO PREMISES RENTED TO YOU:	\$1,000,000
ASSAULT OR BATTERY AGGREGATE LIMIT	\$1,000,000
ASSAULT OR BATTERY EACH OCCURRENCE SUBLIMIT	\$1,000,000
MEDICAL PAYMENTS:	EXCLUDED
HIRED & NON-OWNED AUTO:	\$1,000,000

DEDUCTIBLE		
THE DEDUCTIBLE AMOUNT SHALL BE SEPARATELY APPLICABLE TO EACH CLAIM FIRST MADE AGAINST THE INSURED DURING THE POLICY PERIOD AND SHALL APPLY TO DAMAGES AND CLAIMS EXPENSES		
EACH CLAIM WITHOUT AGGREGATE	\$10,000	

DESCRIPTION OF BUSINESS

FORM OF BUSINESS: LLC

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

POLICY CHANGES

COMPANY:	NAMED INSURED: Verano Holdings, LLC; Ataraxia, LLC; Albion, LLC; TAB Management; ILMM Logistics, LLC; VZL Staffing Services, LLC	POLICY CHANGES EFFECTIVE DATE: 9/1/2022
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<p>COVERAGES PARTS AFFECTED:</p> <table><tr><td><input type="checkbox"/> ALL COVERAGE PARTS</td><td><input type="checkbox"/> COMMERCIAL PROPERTY COVERAGE PARTS</td></tr><tr><td><input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY COVERAGE PARTS</td><td><input type="checkbox"/> COMMERCIAL INLAND MARINE COVERAGE PARTS</td></tr><tr><td><input type="checkbox"/> COMMERCIAL PRODUCT LIABILITY COVERAGE PARTS</td><td></td></tr></table>	<input type="checkbox"/> ALL COVERAGE PARTS	<input type="checkbox"/> COMMERCIAL PROPERTY COVERAGE PARTS	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY COVERAGE PARTS	<input type="checkbox"/> COMMERCIAL INLAND MARINE COVERAGE PARTS	<input type="checkbox"/> COMMERCIAL PRODUCT LIABILITY COVERAGE PARTS	
<input type="checkbox"/> ALL COVERAGE PARTS	<input type="checkbox"/> COMMERCIAL PROPERTY COVERAGE PARTS					
<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY COVERAGE PARTS	<input type="checkbox"/> COMMERCIAL INLAND MARINE COVERAGE PARTS					
<input type="checkbox"/> COMMERCIAL PRODUCT LIABILITY COVERAGE PARTS						
<p>CHANGES:</p> <p>IT IS HEREBY AGREED AND UNDERSTOOD THAT THE POLICY HAS BEEN AMENDED AS FOLLOWS</p> <p>The following Additional Named Insured has been added to the policy: Verano Alabama, LLC</p>						

This endorsement is issued as part of the policy. Except as it expressly states, it does not (i) modify any of the terms and provisions of the policy, (ii) modify any prior endorsements, (iii) extend the Date of Policy, or (iv) increase the Amount of Insurance. To the extent a provision of the policy or a previous endorsement is inconsistent with an express provision of this endorsement, this endorsement controls. Otherwise, this endorsement is subject to all of the terms and provisions of the policy and of any prior endorsements.

Policy Number

PRODUCTS/COMPLETED OPERATIONS LIABILITY CLAIMS MADE AND REPORTED INSURANCE DECLARATIONS

THIS IS A CLAIMS MADE AND REPORTED POLICY. PLEASE READ CAREFULLY. EXCEPT TO SUCH EXTENT AS MAY OTHERWISE BE PROVIDED HEREIN, THE COVERAGE AFFORDED UNDER THIS INSURANCE POLICY IS LIMITED TO THOSE CLAIMS WHICH ARE FIRST MADE AGAINST THE INSURED AND REPORTED TO THE COMPANY DURING THE POLICY PERIOD OR EXTENDED REORTING PERIOD (IF APPLICABLE). DAMAGES AND CLAIMS EXPENSES SHALL BE APPLIED AGAINST THE DEDUCTIBLE.

INSURANCE IS EFFECTIVE WITH:

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ITEM 1:

Named Insured: Verano Holdings, LLC; Ataraxia, LLC; Albion, LLC; TAB Management; ILMM Logistics, LLC; VZL Staffing Services, LLC
Mailing Address 415 N DEARBORN STREET, CHICAGO, IL 60654

ITEM 2:

Policy Period : FROM 8/10/2022 TO 8/10/2023 AT 12:01 A.M.STANDARD TIME

ITEM 3: LIMITS OF LIABILITY

The total Limit of Liability of the Company, including **Damages** and **Claims Expenses**, for all **Claims** first made against the **Insured** and reported in writing to the Underwriting during the **Policy Period** shall not exceed:

- (A) \$10,000,000 EACH CLAIM
- (B) \$10,000,000 TERM AGGREGATE – ALL COVERAGES COMBINED

ITEM 4: DEDUCTIBLE

Amount of Deductible: EACH **CLAIM** WITHOUT AGGREGATE

The Deductible amount shall be separately applicable to each **Claim** first made against the **Insured** during the **Policy Period** and shall apply to **Damages** and **Claims Expenses**.

ITEM 5: GROSS PREMIUM

TOTAL PREMIUM: \$ _____
PREMIUM BASIS (RECEIPTS) : \$ _____

Plus fess and taxes as applicable, which shall be payable in full at inception of this Insurance as designated in form QS IL DS 00 09 08

POLICY NUMBER:

THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

POLICY CHANGES

COMPANY:	NAMED INSURED: Verano Holdings, LLC; Ataraxia, LLC; Albion, LLC; TAB Management; ILMM Logistics, LLC; VZL Staffing Services, LLC	POLICY CHANGES EFFECTIVE DATE: 9/1/2022
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COVERAGE PARTS AFFECTED: <ul style="list-style-type: none"><input type="checkbox"/> ALL COVERAGE PARTS<input type="checkbox"/> COMMERCIAL GENERAL LIABILITY COVERAGE PARTS<input checked="" type="checkbox"/> COMMERCIAL PRODUCT LIABILITY COVERAGE PARTS<input type="checkbox"/> COMMERCIAL PROPERTY COVERAGE PARTS<input type="checkbox"/> COMMERCIAL INLAND MARINE COVERAGE PARTS
CHANGES: IT IS HEREBY AGREED AND UNDERSTOOD THAT THE POLICY HAS BEEN AMENDED AS FOLLOWS The following Additional Named Insured has been added to the policy: Verano Alabama, LLC

This endorsement is issued as part of the policy. Except as it expressly states, it does not (i) modify any of the terms and provisions of the policy, (ii) modify any prior endorsements, (iii) extend the Date of Policy, or (iv) increase the Amount of Insurance. To the extent a provision of the policy or a previous endorsement is inconsistent with an express provision of this endorsement, this endorsement controls. Otherwise, this endorsement is subject to all of the terms and provisions of the policy and of any prior endorsements.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 39: Quality Control and Quality Assurance Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

Exempt pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended))
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.

Verano Alabama, LLC

Business License Applicant Name

Integrated Facility

License Type

Ownership Entity Information

Verano Holdings Corp.

Ownership Entity Name

49%

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

George Archos

Owner Name

Owner and CEO

Role

18.7%

% Ownership in Entity

City

State

Zip

Edward Brown

Owner Name

Director

Role

<5%

% Ownership in Entity

City

State

Zip

R. Michael Smullen

Director

<5%

Owner Name

Role

% Ownership in Entity

Cristina Nunez

Director

<5%

Owner Name

Role

% Ownership in Entity

Lawrence Hirsh

Director

<5%

Owner Name

Role

% Ownership in Entity

John Tipton

Officer (President)

<5%

Owner Name

Role

% Ownership in Entity

City

State

Zip

James Leventis

Officer (EVP - Legal, Government Affairs)

<5%

Owner Name

Role

% Ownership in Entity

Darren Weiss

Officer (Chief Operating Officer)

<5%

Owner Name

Role

% Ownership in Entity

Brett Summerer

Officer (Chief Financial Officer)

<5%

Owner Name

Role

% Ownership in Entity

City

State

Zip

Owner Name

Role

% Ownership in Entity

Street Address

City

State

Zip

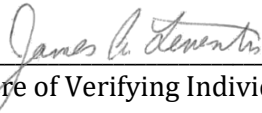
Applicant Verification: The undersigned hereby verifies that the information provided hereinabove (and attached, as necessary) constitutes a complete and accurate list of all individuals with an applicable ownership interest in an ownership entity with an ownership interest in the Applicant.

James A. Leventis

Chief Compliance Officer

Printed Name of Verifying Individual

Title of Verifying Individual



12/22/2022

Signature of Verifying Individual

Verification Date

FORM I: OWNERSHIP ENTITY INDIVIDUALS

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

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

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

Verano Alabama, LLC
Business License Applicant Name

Integrated Facility
License Type

Ownership Entity Information

Lanier Long Properties, LLC
Ownership Entity Name

51%
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

Mary Margaret Lanier Long
Owner Name

Owner, Member, and Manager
Role

100%
% Ownership in Entity

City _____ State _____ Zip _____

Owner Name _____ Role _____ % Ownership in Entity _____

Street Address _____

City _____ State _____ Zip _____

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

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

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

Owner Name	Role	% Ownership in Entity
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 list of all individuals with an applicable ownership interest in an ownership entity with an ownership interest in the Applicant.

Mary Margaret Lanier Long
Printed Name of Verifying Individual

Chief Agricultural Officer
Title of Verifying Individual

Mary Margaret Lanier Long
Signature of Verifying Individual

12-6-2022
Verification Date

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

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detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

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Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 33: Security Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 34: Personnel	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 35: Business Leadership Credentials	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 36: Employee Handbook	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 37: Secure Transport Drivers	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 38: Driver's Manual	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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Exhibit 40: Contamination and Recall Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 41: Marketing and Advertising Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 42: Website and Social Media	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Application Form	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM I_ Ownership-Entity-Individuals	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
FORM K- Affidavit of Entity Application	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Proof of Minimum Liability and Casualty Insurance	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information

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

STATE OF MICHIGAN)
)
INGHAM 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: Verano Alabama, LLC

2. NAME OF AFFIANT: James A. Leventis

3. AFFIANT'S POSITION WITH APPLICANT: Chief Compliance Officer

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.
JAL 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.)
JAL 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.
JAL 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

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

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.

JAL 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.

JAL INITIAL HERE

- f. Applicant understands, acknowledges, and will continue to respect and comply with AMCC Rules regarding limited communication during the Application process.

JAL 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.

JAL 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.

JAL 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.

JAL 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.

JAL INITIAL HERE

[Handwritten Signature]

Signature of Affiant
Acting for and on behalf of:

Verano Alabama, LLC

Applicant

Sworn to and subscribed before me on this 29TH day of DECEMBER, 22.

[Handwritten Signature]

Notary Public

My Commission Expires: 08/25/2029

[SEAL]

THOMAS MAYES
Notary Public, State of Michigan
County of Ingham
My Commission Expires 08-25-2029
Acting in the County of INGHAM

Herein, Verano Alabama, LLC (“Applicant”) duly authorizes James Leventis, the Chief Compliance Officer, to serve as the Applicant’s contact person. Please allow this letter to serve as the Applicant’s written authorization to allow James Leventis to provide the Affidavit found in Form K.

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

STATE OF Illinois)
)
COOK 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: Verano Alabama, LLC

2. NAME OF AFFIANT: Darren Weiss

3. AFFIANT'S POSITION WITH APPLICANT: Chief Operating Officer

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.

[Signature] 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.)

[Signature] 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.

[Signature] 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

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

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.

[Signature] 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.

[Signature] INITIAL HERE

- f. Applicant understands, acknowledges, and will continue to respect and comply with AMCC Rules regarding limited communication during the Application process.

[Signature] 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.

[Signature] 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.

[Signature] 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.

[Signature] 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.

[Signature] INITIAL HERE

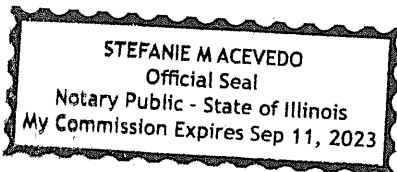
[Signature]
Signature of Affiant
Acting for and on behalf of:

Verano Alabama, LLC
Applicant

Sworn to and subscribed before me on this 15th day of February, 2023

[Signature]
Notary Public

My Commission Expires: sep. 11, 2023



[SEAL]

Herein, Verano Alabama, LLC (“Applicant”) duly authorizes Darren Weiss, the Chief Operating Officer, to serve as the Applicant’s Responsible person. Please allow this letter to serve as the Applicant’s written authorization to allow Darren Weiss to provide the Affidavit found in Form K.

1. Declaration of Exempt Information

Applicant has provided below a listing of information claimed to be exempt from public disclosure. This listing identifies each section of the application that has been excluded from the Redacted Copy provided with the application, as described in Section 1.8 of these Application Instructions. Applicant considers many portions of application-related documents, information, or records submitted to the Commission to be a trade secret and/or otherwise exempt from public inspection or disclosure pursuant to Alabama Public Records Law (§ 36-12-40, et seq., Code of Alabama 1975 (as amended)), the Applicant has prominently and conspicuously marked all such information as “**Confidential–Exempt from Public Disclosure.**” The Applicant has submitted a brief, written description of the grounds for each redaction, including the specific statutory authority supporting each redaction.

1.1.1. Written Description of the Grounds for Each Exemption

Pursuant to § 36-12-40, Rights of citizens to inspect and copy public writings; exceptions. Every citizen has a right to inspect and take a copy of any public writing of this state, except as otherwise expressly provided by statute. Provided however, registration and circulation records and information concerning the use of the public, public school or college and university libraries of this state shall be exempted from this section. Provided further, any parent of a minor child shall have the right to inspect the registration and circulation records of any school or public library that pertain to his or her child. Notwithstanding the foregoing, records concerning **security plans, procedures, assessments, measures, or systems**, and any other records relating to, or having an impact upon, the security or safety of persons, structures, facilities, or other infrastructures, including without limitation information concerning critical infrastructure (as defined at 42 U.S.C. §5195c(e) as amended) and critical energy infrastructure information (as defined at 18 C.F.R. §388.113(c)(1) as amended) the public disclosure of which could reasonably be expected to be

detrimental to the public safety or welfare, and records the disclosure of which would otherwise be detrimental to the best interests of the public shall be exempted from this section. Any public officer who receives a request for records that may appear to relate to critical infrastructure or critical energy infrastructure information, shall notify the owner of such infrastructure in writing of the request and provide the owner an opportunity to comment on the request and on the threats to public safety or welfare that could reasonably be expected from public disclosure on the records.

1.1.2. Listing of Information Claimed to be Exempt from Public Disclosure

Listing of Information Claimed to be Exempt from Public Disclosure	Specific Statutory Citation for such Exemption	Type of Trade Secret	Notes
Exhibit 1: Resume or Curriculum Vitae of Individuals with Ownership Interest	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 2: Residency of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 3: Commercial Horticulture or Agronomic Production Experience of Owners	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 4: Criminal Background Check	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Data
Exhibit 5: Minimum Performance Bond Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 6: Minimum Liquid Assets Requirement	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Financial Data
Exhibit 7: Demonstration of Sufficient Capital	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 8: Minimum Operating Capital Requirement	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 9: Financial Statements	§ 36-12-40	Secret	Commercial Information with Confidential Financial Data
Exhibit 10: Tax Plan	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 11: Business Formation Documents	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Formation Documents

Exhibit 12: Business License and Authorization of Local Jurisdictions	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Licenses
Exhibit 13: Business Plan	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 14: Evidence of Business Relationship with other Licensees and Prospective Licensees	§ 36-12-40	For use or in use by the business;	Commercial Information with Confidential Business Information
Exhibit 15: Coordination of Information from Registered Certifying Physicians	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 16: Point-of-Sale Responsibilities	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 17: Confidentiality of Patient Information	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 18: Money Handling and Taxes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 19: Standard Operating Plan and Procedures	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 20: Policies and Procedures Manual	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 21: Production and Manufacturing Process	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 22: Machinery and Equipment	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 23: Receiving and Shipping Plan	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 24: Secure Transport Vehicles	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 25: Compliance with Alabama Public Service Commission Requirements	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 26: Commercial Drivers' License	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 27: Fleet Summary	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 28: Care and Maintenance of Vehicles	§ 36-12-40	Secret	Technical Process and Procedures Outlined
Exhibit 29: Route Plans	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 30: Plan for Segregation of Processes	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined

Within and Transportation Between Facilities			
Exhibit 31: Facilities	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
Exhibit 32: Engineering Plans and Specifications (Cultivation Facilities)	§ 36-12-40	Secret	Technical Security Process and Procedures Outlined
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