



# Medical Marijuana Dispensary License Application

Department of Health, Office of Health Care Assurance

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**Criteria 1. Ability to operate a business, including but not limited to education, knowledge, and experience**

**Criteria 2. Plan for operating a medical marijuana dispensary in the county for which the applicant is seeking a license, including but not limited to a timeline for opening a retail dispensing location**

**Criteria 3. Proof of financial stability and access to financial resources**

**Criteria 4. Ability to comply with the security requirements of this chapter and section 329D-7, HRS**

**Criteria 5. Capacity to meet the needs of qualifying patients**

**Criteria 6. Ability to comply with criminal background check requirements pursuant to this chapter and sections 329D-7, 329D-12, and 846-2.7, HRS**

**Criteria 7. Ability to comply with the requirements in this chapter and chapters 329 and 329D, HRS, for inventory tracking, security, and dispensing limits for qualifying patients**

**Criteria 8. Ability to maintain confidentiality of a qualifying patient's medical condition, health status, and purchases of marijuana or manufactured marijuana products**

**Criteria 9. Ability to conduct or contract for certified laboratory testing on marijuana and manufactured marijuana products pursuant to this chapter and sections 329D-7 and 329D-8, HRS**

**Criteria 10. Ability to comply with requirements for packaging, labeling, and chain of custody of products**

**Criteria 11. A plan for secure disposal of marijuana and manufactured marijuana products**

**Criteria 12. Ability to ensure product safety, in accordance with this chapter and sections 329D-8, 329D-10, 329D-11, HRS**

**Criteria 13. No history of having a business license revoked.**

**Total Merit Criteria Points Awarded to Applicant**

**HELPFUL INFORMATION FOR FILLING OUT THIS FORM:**

1. You can save your work on this form by checking the 'Save my progress and resume later' box and then clicking the 'Save form and resume later' button at the bottom of each screen. **IMPORTANT:** Remember to do this every time you leave your application or you will lose the information you have entered.
2. To keep your information secure, remember to log out of your application each time you finish working on it.
3. Use a current version of Google Chrome or Firefox browser when completing this form.
4. Save the form every 20 minutes to avoid timing out. When entering information in a spreadsheet, save and exit the form first.
5. Do not include single or double quote marks ( ' or " ) or more than one period ( . ) in your document names.

**INSTRUCTIONS FOR THE MEDICAL MARIJUANA DISPENSARY LICENSE APPLICATION**

Before applying for a medical marijuana dispensary license, applicants must acknowledge that they have read the statute and administrative rules on medical marijuana dispensary licensing. Click be redirected to the statute and administrative rules.

Hawaii Revised Statute (HRS) 329D	✔ I acknowledge that I have read <a href="http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/9329D-HRS.pdf">Chapter 329D, HRS (http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/9329D-HRS.pdf)</a> , and I am aware of the application and licensing requirements.
Hawaii Administrative Rules (HAR) Chapter 11-850	✔ I acknowledge that I have read <a href="http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/93/files/2015/12/Dispensary-Rules-Chapter-11-850-signed-by-Gov-12-13-15.pdf">HAR, Chapter 11-850 (http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/93/files/2015/12/Dispensary-Rules-Chapter-11-850-signed-by-Gov-12-13-15.pdf)</a> , and I am aware of the requirements.
Disclaimer:	✔ I understand that the use and possession of marijuana is illegal under federal law, and is illegal under State law except as provided in Chapters 329 and 329D, HRS.

**MINIMUM REQUIREMENTS**

All individual applicants and applying entities must meet the requirements listed below or the application will not be accepted. Applicants must attach proof to the online application as described in sections.

**INDIVIDUAL APPLICANT**

- \* Individual applicant shall be at least 21 years old.
- \* Shall be a legal resident of the State of Hawaii for at least five (5) uninterrupted years immediately preceding the date of the license application.
- \* Shall not have any felony convictions or any other disqualifying background history.
- \* Shall be authorized by the applying entity to submit an application for a dispensary license, and act as the primary point of contact with the department.

**APPLYING ENTITY**

- \* The applying entity must be organized under the laws of the State of Hawaii.
- \* Have a Hawaii tax identification number.
- \* Have a Department of Commerce and Consumer Affairs Business Registration Division number and suffix.
- \* Have a federal employer identification number.
- \* Not be less than fifty-one percent held by Hawaii legal residents or entities wholly controlled by Hawaii legal residents who have been legal residents for not less than five years immediately prece application was submitted.
- \* Have financial resources under its control of not less than \$1,000,000 for each license applied for, plus not less than \$100,000 for each retail dispensing location allowed under the license applied statements or escrow accounts, and those financial resources shall have been under the control of the applying entity for not less than ninety days immediately preceding the date the application v
- \* Be composed of owners, principals, or members, each of whom is not less than twenty-one years of age and has no felony convictions or any other disqualifying background history.

**APPLICATION FEE**

The license application fee of \$5,000 by certified check or cashier's check payable to the State of Hawaii, Department of Health, is part of the minimum requirements and must be received at Depart Marijuana Dispensary Licensing, Room 337, 601 Kamokila Blvd., Kapolei, HI 96707 or be postmarked by 4:30 pm Hawaii Standard Time on the last day of the open application period January 29, 201

Please note the application number on the check. This is found in the heading of the email confirmation you receive upon submittal, and is also visible when you view your completed application or

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**NOTE: ALL QUESTIONS MUST BE ANSWERED TO SUBMIT YOUR APPLICATION UNLESS OTHERWISE INDICATED.**

**SECTION A: APPLICATION FOR COUNTY**

**NOTE:** An applicant may apply for a license for more than one county, but may only receive one license. Indicating here that you are applying for a license for more than one county does not consti license in another county; separate applications must be submitted. The applicant and applying entity must complete a separate application with all required documentation for each application an refundable application fee of \$5,000 for each application. The financial resources required (\$1,000,000 plus not less than \$100,000 for each retail dispensing location) may apply across applications only apply toward one license, if granted.

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1. For which county are you requesting a license? City & County of Honolulu

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2. Are you also applying for a dispensary license in another county?

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2a. If YES, what other county or counties are you applying for a license?  
(NOTE: A separate application and check will be required for each county.)

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**SECTION B: INDIVIDUAL APPLICANT INFORMATION**

**GENERAL INFORMATION**

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3. Legal Name of Applicant Christopher David Cole

4. Upload Proof of Legal Name of Applicant

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certified copy of the Certificate of Naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Court-issued, certified copy of a divorce decree;
- \* Certified copy of a legal change of name order

0 [REDACTED]

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5. Date of Birth (must be at least 21 years old) [REDACTED]

6. Upload Proof of Date of Birth of Applicant

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certificate of naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Valid, unexpired driver's license or government issued photo identification card.

0 [Redacted]

7. Social Security No. or Identifier No. (last 4 digits only): [Redacted]

8. Applicant's Address [Redacted]

United States

9. Daytime Phone No. [Redacted]

10. Fax No. [Redacted]

11. Email [Redacted]

CRIMINAL HISTORY INFORMATION

12. Has the individual applicant ever been convicted of a felony? If YES, STOP, you are not an eligible applicant. [Redacted]

13. Has the individual applicant ever been convicted of a crime? [Redacted]

13a. If YES, please describe (e.g., conviction, date, disposition, etc.)

14. Has the individual applicant ever been arrested? [Redacted]

14a. If YES, please describe (e.g., date, disposition, etc.)



Obtain a Criminal History Report

Copy the Validation code from an eCrim report for the individual applicant generated by the Hawaii Criminal Justice Data Center no earlier than December 12, 2015 at 8:00 a.m. (Hawaii-Aleutian Standard Time).

[Redacted]

Visit [eCrim.ehawaii.gov \(https://ecrim.ehawaii.gov/ahewa/\)](https://ecrim.ehawaii.gov/ahewa/) to obtain the eCrim report.

15. Enter the eCrim Validation Code here:

16. NOTICE: Pursuant to Chapter 329D HRS and Chapter 11-850 HAR, applicants are required to provide consent to a background check, including fingerprinting, to be conducted by the Department of Health or its designee.

I consent

Further information and instructions will be provided on <http://health.hawaii.gov/medicalmarijuana/>. If the information and instructions are not yet posted, please check the website often.

RESIDENCY INFORMATION 17. Is the Applicant a legal resident of the State of Hawaii for at least five years? If NO, STOP, you are not an eligible applicant.

18. Upload Proof of Hawaii Residency:

Scan and submit AT LEAST ONE (1) of the following source documents as proof of Hawaii state residency for at least five years:

- \* State of Hawaii tax return Form N-11 without schedules, worksheets, or attachments, and redacted to remove all financial information and all but the last four digits of the individual's social security number;
- \* Evidence of voter registration;
- \* Ownership, lease, or rental documents for place of primary domicile;
- \* Billing statements including utility bills; or
- \* Vehicle registration.

[Redacted]

19. Authorized to Act on Behalf of Applying Entity

Scan and submit evidence of the authority of the individual to act on behalf of the applying entity, and supporting documentation (e.g. corporate resolution, bylaws, articles of incorporation):

[Redacted]

SECTION C: APPLYING ENTITY INFORMATION

20. Name of Applying Entity CC Vet Services

21. Applying Entity's Business Address [Redacted]  
United States

22. Entity Phone # [Redacted]

23. Entity Email [Redacted]

24. Entity Fax # [Redacted]

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25. Is the applying entity organized under the laws of the State of Hawaii?   
If the answer is 'NO', STOP, you are not an eligible applicant.

26. Upload Applying Entity Incorporation or Business Status Documentation:

Upload a certified copy of applying entity's incorporation documents in the State of Hawaii.



Visit [Hawaii Business Express \(https://hbe.ehawaii.gov/documents/search.html\)](https://hbe.ehawaii.gov/documents/search.html) for available documents.

27. Provide the entity's Hawaii Department of Commerce & Consumer Affairs Business Registration Division Number & Suffix (file number).



Visit [Hawaii Business Express - Business Name Search \(https://hbe.ehawaii.gov/documents/search.html\)](https://hbe.ehawaii.gov/documents/search.html) to locate your entity's file number.

28. Upload a copy of the entity's Certificate of Good Standing from the Department of Commerce and Consumer Affairs.



29. Hawaii Tax Identification Number:

Provide the number along with a copy of the State of Hawaii Tax Identification Number (see question immediately below).



Visit [Tax ID Search \(https://dotax.ehawaii.gov/tls/app\)](https://dotax.ehawaii.gov/tls/app) for this information.

30. Upload a copy of the entity's State of Hawaii Tax Identification document.



31. Federal Employer Identification Number: Provide the Federal Employer Identification Number.



32. Upload a copy of the entity's Federal Employer Identification Number document.



**OWNER(S), PRINCIPAL(S), & MEMBER(S) INFORMATION**

33. Enter the total number of Owner(s), Principal(s), and Member(s) of the applying entity here:



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**34. Upload Owner, Principal, and Member Information Spreadsheet**

**INSTRUCTIONS:** Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Information to be provided:

**1) List of Owners, Principals, and Members of the Applying Entity**

For each Owner, Principal, and Member of the Applying Entity:

- A) Name, Address, Phone number, and Email Address
- B) Each individual's percent interest in the company
- C) State of primary residence
- D) Number of years each person has lived in Hawaii (the most recent, uninterrupted number of years that the person has been a resident), and
- E) A criminal background check for each Owner, Principal, and Member.

Copy the validation code from an eCrim report for the individual generated by the Hawaii Criminal Justice Data Center no earlier than December 12, 2015 at 8:00 a.m. (Hawaii-Aleutian Standard Time).

Visit [eCrim.ehawaii.gov \(https://ecrim.ehawaii.gov/ahewa/\)](https://ecrim.ehawaii.gov/ahewa/) to obtain the eCrim report.

Please include a signed statement by each Owner, Principal, or Member certifying that the information is complete and accurate. Upload the signed statements in the following question (35.)

**2) Other Businesses Holding an Interest**

If there are businesses that hold an interest in the company, list the business names and percent interest on a separate tab on the spreadsheet.

[Download Owner Principal Member Information Spreadsheet \(/mmjdisp/templates/Owner\\_Principal\\_Member\\_Report.xls\)](#)

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35. Upload Proof of Name, Date of Birth, and Residency for each Officer, Principal, or Member listed on the spreadsheet

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

1) Proof of Legal Name of Each Owner, Principal, and Member:

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certificate of naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Court-issued, certified copy of a divorce decree;
- \* Certified copy of a legal change of name order;

2) Proof of Date of Birth

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certificate of naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Valid, unexpired driver's license or government issued photo identification card.



3) Proof of Hawaii Residency:

Scan and submit AT LEAST ONE (1) of the following source documents as proof of Hawaii state residency for at least five years:

- \* State of Hawaii tax return Form N-11 without schedules, worksheets, or attachments, and redacted to remove all financial information and all but the last four digits of the individual's social security number;
- \* Evidence of voter registration;
- \* Ownership, lease, or rental documents for place of primary domicile;
- \* Billing statements including utility bills; or
- \* Vehicle registration.

Document size limit is 2 MB. Up to 10 documents may be attached.

SECTION D: FINANCIAL INFORMATION

36. FINANCIAL RESOURCES GENERAL INFORMATION

INSTRUCTIONS: Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Information to be provided:

1) Financial Resources the applying entity has under its control. List each financial resource, amount of the resource (round to nearest dollar, no cents), and verifying information (account type, account number, account name, name of financial institution, applicant contact information) as shown on the spreadsheet

1 [Redacted]

2) Date Resource/Dollar amount under the applying entity's control

[Download Financial Resources General Information Spreadsheet \(/mmjdisp/templates/Financial\\_Resources\\_General.xls\)](#)

Upload the completed Financial Resources General Information Spreadsheet

37. Upload Financial Resources General Information Supporting Source Documents

Upload supporting source documents, i.e. bank statements, escrow account information, balance sheets etc. Supporting source documents for Financial Resources General Information must be provided as proof of the financial resources.

1 [Redacted]

Document size limit is 10 MB. Up to 5 documents may be attached.



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**38. FINANCIAL RESOURCES -  
RETAIL DISPENSING LOCATION INFORMATION**

**INSTRUCTIONS:** Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Data to be provided:

1) Financial Resources the applying entity has under its control for each retail dispensing location allowed (2 locations maximum)

2) Dollar Amount (total aggregate for each retail dispensing location shall be not less than \$100,000, or \$200,000 for 2 locations)



3) Date Resource/Dollar amount under the applying entity's control (resources have been under the Applying Entity's control for not less than 90 days)

[Download Financial Resources - Retail Dispensing Location Information Spreadsheet \(/mmjdisp/templates/Financial\\_Resources\\_Retail\\_Dispensing\\_Location.xls\)](#)

Upload the completed Financial Resources - Retail Dispensing Location Information Spreadsheet

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**39. Upload Retail Dispensary Location Supporting Source Documents**

Upload supporting source documents, i.e. bank statements, escrow account information, balance sheets etc. Supporting source documents for retail dispensary locations must be provided as proof of the financial resources.



Document size limit is 10 MB. Up to 5 documents may be attached.

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**SECTION E: MERIT INFORMATION - OPTIONAL**

Responses for each criteria shall be no longer than specified for each criteria, double spaced, font size no smaller than 12, and margins no less than 1 inch on all sides.

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- (1) Ability to operate a business, including but not limited to education, knowledge, and experience with:
- (A) Regulated industries;
  - (B) Agriculture or horticulture;
  - (C) Commercial manufacturing;
  - (D) Pharmaceutical companies;
  - (E) Operating or working in a medical marijuana dispensary business;
  - (F) Creating and implementing a business plan, including a timeline for opening a business;
  - (G) Creating and implementing a financial plan;
  - (H) Retail sales;
  - (I) Secure inventory tracking and control;
  - (J) Protecting confidential customer information;
  - (K) Owning or managing a business that required twenty four hour security monitoring; and
  - (L) Any other experience the applicant considers relevant;

0 [Redacted]

Response to (1) shall be no longer than five (5) pages.

Upload Response to (1)

- 
- (2) Plan for operating a medical marijuana dispensary in the county for which the applicant is seeking a license, including but not limited to a timeline for opening a retail dispensing location;

0 [Redacted]

Response to (2) shall be no longer than five (5) pages.

Upload Response to (2)

- 
- (3) Proof of financial stability and access to financial resources, including but not limited to:
- (A) Legal sources of finances immediately available to begin operating a dispensary;
  - (B) A summary of financial statements in businesses previously or currently owned or operated by the applicant;
  - (C) A financial plan for operating a medical marijuana dispensary in Hawaii;
  - (D) Good credit history; and
  - (E) History of bankruptcy by the applicant or entities owned or operated by the applicant;

0 [Redacted]

Response to (3) shall be no longer than five (5) pages.

Upload Response to (3)

- 
- (4) Ability to comply with the security requirements of Chapter 11-850 and Section 329D-7, HRS;

0 [Redacted]

Response to (4) shall be no longer than five (5) pages.

Upload Response to (4)

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(5) Capacity to meet the needs of qualifying patients, including but not limited to:

(A) Educating patients on how marijuana can be used to assist patients with debilitating medical conditions and about the marijuana and manufactured marijuana products that will be available in the applicant's retail dispensing locations;

(B) Producing and maintaining a supply of marijuana that is sufficient to meet the needs of qualifying patients;

(C) Providing safe, accessible retail dispensing locations; and

(D) Measuring and improving customer satisfaction;

0 [Redacted]

Response to (5) shall be no longer than five (5) pages.

Upload Response to (5)

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(6) Ability to comply with criminal background check requirements pursuant to Chapter 11-850 and Sections 329D-7, 329D-12, and 846-2.7, HRS;

0 [Redacted]

Response to (6) shall be no longer than three (3) pages.

Upload Response to (6)

---

(7) Ability to comply with the requirements in Chapter 11-850 and Sections 329 and 329D, HRS, for inventory tracking, security, and dispensing limits for qualifying patients;

0 [Redacted]

Response to (7) shall be no longer than five (5) pages.

Upload Response to (7)

---

(8) Ability to maintain confidentiality of a qualifying patient's medical condition, health status, and purchases of marijuana or manufactured marijuana products;

0 [Redacted]

Response to (8) shall be no longer than three (3) pages.

Upload Response to (8)

---

(9) Ability to conduct or contract for certified laboratory testing on marijuana and manufactured marijuana products pursuant to Chapter 11-850 and Sections 329D-7 and 329D-8, HRS;

0 [Redacted]

Response to (9) shall be no longer than three (3) pages.

Upload Response to (9)

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(10) Ability to comply with requirements for packaging, labeling, and chain of custody of products;

0 [Redacted]

Response to (10) shall be no longer than three (3) pages.

Upload Response to (10)

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(11) A plan for secure disposal of marijuana and manufactured marijuana products;

Response to (11) shall be no longer than five (5) pages.

[Redacted]

Upload Response to (11)

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(12) Ability to ensure product safety, in accordance with Chapter 11-850 and Sections 329D-8, 329D-10, 329D-11, HRS.

Response to (12) shall be no longer than five (5) pages.

[Redacted]

Upload Response to (12)

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(13) No history of having a business license revoked.

Response to (13) shall be no longer than three (3) pages.

[Redacted]

Upload Response to (13)

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**SECTION F: CERTIFICATION AND SUBMITTAL**

**Certification**

I hereby certify under penalty of law that the information submitted as part of this application is correct and complete.

By checking the box above and entering the individual applicant's name below, the applicant has electronically signed this application.

**Applicant Name**

Chris Cole

If you have previously submitted an application and this is a revision, enter the unique entry number(s) of your previous submission(s) here.

**User ID**

[Redacted]

**User Email**

[Redacted]

Entry Info

**Date Created**

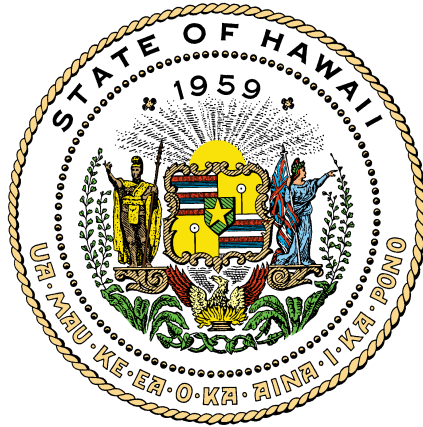
[Redacted]

**Date Updated**

**IP Address**

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## Department of Commerce and Consumer Affairs

### CERTIFICATE OF GOOD STANDING

I, the undersigned Director of Commerce and Consumer Affairs of the State of Hawaii, do hereby certify that according to the records of this Department,

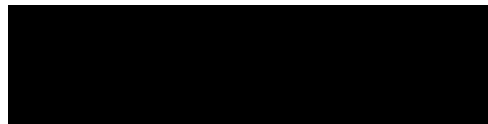
CC VETERAN SERVICES, LLC

was organized under the laws of the State of Hawaii on 08/23/2012 ; that it is an existing limited liability company in good standing and is duly authorized to transact business.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Department of Commerce and Consumer Affairs, at Honolulu, Hawaii.

Dated: January 25, 2016



Director of Commerce and Consumer Affairs

08/24/201220235

08/24/201220235

FILED 08/23/2012 01:56 PM  
Business Registration Division  
DEPT. OF COMMERCE AND  
CONSUMER AFFAIRS  
State of Hawaii

STATE OF HAWAII  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
Business Registration Division  
335 Merchant Street  
Mailing Address: P.O. Box 40, Honolulu, Hawaii 96810  
Phone No. (808) 586-2727



**ARTICLES OF ORGANIZATION FOR LIMITED LIABILITY COMPANY**  
(Section 428-203, Hawaii Revised Statutes)

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK

The undersigned, for the purpose of forming a limited liability company under the laws of the State of Hawaii, do hereby make and execute these Articles of Organization:

I

The name of the company shall be:

CC VETERAN SERVICES, LLC

(The name must contain the words *Limited Liability Company* or the abbreviation *L.L.C.* or *LLC*)

II

The mailing address of the initial principal office is:



III

The company shall have and continuously maintain in the State of Hawaii a registered agent who shall have a business address in this State. The agent may be an individual who resides in this State, a domestic entity or a foreign entity authorized to transact business in this State.

- a. The name (and state or country of incorporation, formation or organization, if applicable) of the company's registered agent in the State of Hawaii is:

CHRISTOPHER DAVID COLE

(Name of Registered Agent)

(State or Country)

- b. The street address of the place of business of the person in State of Hawaii to which service of process and other notice and documents being served on or sent to the entity represented by it may be delivered to is:



IV

The name and address of each organizer is:

CHRISTOPHER DAVID COLE



\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



V

The period of duration is (check one):

At-will

For a specified term to expire on: \_\_\_\_\_  
(Month Day Year)

VI

The company is (check one):

a.  Manager-managed, and the names and addresses of the initial managers are listed in paragraph "c", and the number of initial members are: \_\_\_\_\_.

b.  Member-managed, and the names and addresses of the initial members are listed in paragraph "c".

c. List the names and addresses of the initial managers if the company is Manager-managed, or List the names and addresses of the initial members if the company is Member-managed.

CHRISTOPHER DAVID COLE



\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VII

The members of the company (check one):

Shall not be liable for the debts, obligations and liabilities of the company.

Shall be liable for all debts, obligations and liabilities of the company.

Shall be liable for specified debts, obligations and liabilities of the company *as stated below*, and have consented in writing to the adoption of this provision or to be bound by this provision.

\_\_\_\_\_  
\_\_\_\_\_

We certify, under the penalties set forth in the Hawaii Uniform Limited Liability Company Act, that we have read the above statements, I am authorized to sign this Articles of Organization, and that the above statements are true and correct to the best of our knowledge and belief.

Signed this 23 day of AUGUST, 2012

CHRISTOPHER DAVID COLE

\_\_\_\_\_  
(Type/Print Name of Organizer)



(Signature of Organizer)

\_\_\_\_\_  
(Signature of Organizer)

SEE INSTRUCTIONS PAGE. The articles must be signed and certified by at least one organizer of the company.

JY

Date: September 19, 2012

Dept. of Commerce & Consumer Affairs  
Business Registration Division  
P.O. Box 40  
Honolulu, HI 96810

Received Business Registration  
Division, September 19, 2012 1:51 PM  
Department of Commerce and  
Consumer Affairs State of Hawaii

09/20/201220040

RE: CC Veteran Services, LLC

To Whom It May Concern:

These are the current member(s)/manager(s) for the above mentioned LLC:

Name: Christopher David Cole

Address: [REDACTED]

Name: Mountain Chief Management Services, Inc.

Address: PO BOX 369  
4156 HWY 89

Babb, Montana 59411

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

File # 98565C5

I certify under the penalties of the Hawaii Revised Statutes that I am authorized to make this change for the entity and the statements herein are true and correct in all material respects.

Sincerely,



(Signature)

Christopher David Cole, member  
(Print name & title)

CMI

Date: October 17, 2012

Dept. of Commerce & Consumer Affairs  
Business Registration Division  
P.O. Box 40  
Honolulu, HI 96810

Received Business Registration  
Division October 18, 2012 1:46 PM  
Department of Commerce and  
Consumer Affairs State of Hawaii

RE: CC Veteran Services, LLC

To Whom It May Concern:

These are the current member(s)/~~manager(s)~~ for the above mentioned LLC:

Name: Christopher David Cole

Address: 2064 Palolo Ave

Honolulu, HI 96816

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_


Name: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_

I certify under the penalties of the Hawaii Revised Statutes that I am authorized to make this change for the entity and the statements herein are true and correct in all material respects.

Sincerely,

  
(Signature)

Christopher David Cole, member

(Print name & title)

File No. 98565 C5



List the business name(s) and percent interest on the spreadsheet if there are businesses that hold an interest in the applying entity.

Other Businesses Holding an Interest

Percent Interest

## Operations Plan

CC Veteran Services LLC (CCVS) is dedicated to ensuring DOH qualified medical marijuana patients and caregivers are able to access pharmaceutical grade, lab tested cannabis medicine in a safe, secure dispensary environment. To that end, CCVS has partnered with The Green Solution®, a Hawaii register, vertically integrated, medical cannabis franchisor. Although CCVS is solely owned by Hawaiian residents, Linda Nakagawa and Chris Cole, as a TGS National franchisee they will have the advantage of entering the Island of Oahu with unprecedented expertise, past performance history, standard operating procedures (SOP's & TOPG's), training manuals and protocols, proprietary point-of sale software, national data, analytics and forecasting, IP, genetics and patented, innovative medical products.

With TGS National Franchise's proven track record in Colorado, we conservatively anticipate dispensaries to open early 2017, approximately eleven (11) months after “notice to proceed”. This timeline is predicated on license approval from Hawaii Department of Health. CCVS has taken a number of preliminary steps to ensure swift execution of cultivation/production facility construction and ultimately dispensary opening. These steps include but are not limited to securing both production and dispensary properties and completing architectural, civil and MEP engineering drawings prior to the announcement of license approval. CCVS will accept full financial responsibility for this head start in order to ensure that qualified patients have access to product at the earliest date possible.

Guided by our franchisors experience and past performance history in other states, CCVS proposes the following timeline and early steps to insure dispensary opening:

1. Secure production facility and two dispensary locations: Securing production and dispensary locations will be overseen by CCVS member, Linda Nakagawa. Ms. Nakagawa's expertise in this space is unprecedented. CCVS will rely, in part, on her Honolulu based company, LNW Management Inc. which successfully owns and operates properties in Honolulu such as Pacific Industrial Center, Merchant Square and Kinau Building to name a few. Properties for development are attached in supporting docs.
2. Permitting, Architectural and Engineering: This process will be undertaken prior to April 15<sup>th</sup> license approval. Production facility and dispensary construction management will be overseen by managing member, Chris Cole. Mr. Cole's expertise extends to Department of Defense military construction projects. Mr. Cole was senior project manager for the Schofield Barracks building at Fort Shafter on the Island of Oahu - completed 2013. His expertise extends to national cannabis cultivation and manufacturing building and design for TGS National Franchise. Plans will be submitted for permitting prior to approval.
3. Standard Operating Procedures, Training, Genetics & IP: CCVS franchisor, The Green Solution®, will provide proven policy, procedure, processes and both in-house and remote training to ensure that all local hires are professional trained by industry leaders. Security plans and training and design will also be conducted in anticipation of license approval.

Construction Phase = 6 months (group up build):

CCVS plans to build from ground up two (2) 15,000 sq ft hybrid cultivation buildings and one (1) production facility (see attached architectural design). Water, septic

and electric requirements will all be addressed prior to construction. We will also incorporate solar into our design.

Production Phase = 150 days (5 months):

- Cloning = 10 days
- Vegetation Cycle = 60 days
- Flower cycle = 56 days
- Drying and curing = 10 days
- Product Production of Medical Marijuana Product = 14 days

Dispensary Opening = 11 months post "notice to proceed":

Dispensary permitting and build out will be completed during construction and production phase. Post permitting, dispensary build out is estimated at 3 months. Construction will take place simultaneous to production construction and product production.

The Green Solution® is nationally recognized for their professional, clean, patient centric dispensaries. Voted “Best place to take your mother-in-law!” TGS will provide CCVS all the necessary tools to provide an exceptional cannabis experience™. To provide full transparency to all qualifying patients and caregivers, CCVS will clearly outline the hours of operations through signage posted on the main entry point of all facilities. We propose to open Monday thru Saturday 9am to 8pm.

To ensure operations are running at a high caliber, TGS will train all authorized CCVS employees on security procedures and operational procedures using classroom instruction, practical field training and remote online training modules. This on-site and online training will convey a range of security and operations topics designed to make each patient and caregiver experience safe, professional and pleasant. This ensures that all



agents will be knowledgeable of important compliance standards with the ability to understand and relay legal regulations to qualifying patients and caregivers seeking clarification. Agents are also prepped for handling security situations as they arise.

Moving on to operations inside the facility, CCVS will enforce policies and procedures intended to ensure that access to restricted areas is limited to qualifying patients, caregivers, agents, service professionals and security personnel only, as listed on the Department of Health approved list in compliance with 329D-15. During non-operational hours, all manufactured marijuana products and currency will be securely locked inside an electronically-bolted safe. This safe will remain inside a vault secured via a dual-control, two-layer security access system that will require two authorized agents for entry. A banking solution, facilitated by TGS National Franchise will eliminate the risk of cash and allow employees to be paid through traditional means.

Our dispensary facilities will have a waiting area that is open to the general public. Similar to a doctor's office, all qualifying patients and caregivers will be welcomed by a clean, professional environment. The waiting area will be secured from the service area via a door-striking mechanism that can only be opened by the receptionist.

Once the qualifying patient or caregiver enters through the security door into the patient zone, they will be constantly monitored and visually supervised by an authorized dispensary employee at a one to one ratio. Each agent will take the responsibility of monitoring one qualifying patient or caregiver at a time and maintain visual contact, so long as the patient is in the dispensary.

Within the patient/dispensing zone, manufactured marijuana products will be displayed behind locked and secured glass display cases, where qualifying patients and

caregivers may view but not handle marijuana products. Before entering the non-public area, an agent will gather the proper documentation and double check the identification is verified. Utilizing, TGS proprietary point-of-sale software, an electronic log will be kept as patients enter and leave the dispensary. This software will HL-7 integrate with BioTrack THC inventory control allowing for continuous monitoring, recording and control which will offer accurate seed-to-sale tracking and real-time updates to Hawaii regulatory agencies

Once a qualified patient or caregiver is admitted to the sales floor they will be greeted by a well-trained and knowledgeable dispensing agent. All CCVS agents will have continual access to medical direction (see attached) and resources to ensure proper dosing and product recommendations relative to medical conditions. Once the qualified patient or caregiver exits the facility, the agent will move on to aiding the next qualified patient or caregiver in need of care.

Guided by the expertise of our franchise partner, CCVS has the unique advantage of opening dispensaries in an expedited and timely manner. Using the TGS model and proven track record for exemplary service and product quality, CCVS can ensure continuity of operations and an efficient, effective operations plan. Our meticulous attention to detail translates to a fully robust and reliable cannabis experience™ ensuring all patients an effective medical remedy they can count on.



# Hawaii Dispensary Operations Manual

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## PREFACE - DEPARTMENT OF HEALTH - HAWAII ADMINISTRATIVE RULES, TITLE 11, CHAPTER 850

*The Department of Health, Hawaii Administrative Rules Chapter 11-850 entitled "Medical Marijuana Dispensaries," governs the operation and licensing of medical marijuana dispensaries in the State of Hawaii. This Operations Manual is designed to comply with each of the rules outlined in the Chapter 11-850 and act as a training tool for owners/franchisees, managers and registered employees of the dispensary, as provided to the DOH.*

*The following chapters are designed to satisfy the requirements of the Administrative Rules and identify the business of CC Vetsvcs, LLC (franchisee) in partnership with TGS National, LLC (registered franchisor), as "The Green Solution" which is the DBA of a registered business in the State of Hawaii.*

## INTRODUCTION - GENERAL PROVISIONS (SUBCHAPTER 1) & LICENSING (SUBCHAPTER 2)

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 1 General Provisions, for overall dispensary operation and management.*

### SECTION 0.1 - PURPOSE

*In alignment with the state's purpose for the general provisions set forth in Subchapter 1, The Green Solution seeks to provide "safe and legal access to medical marijuana for qualifying patients." Specific policies and procedures outlined in this Dispensary Operations Manual are written to achieve that purpose.*

### SECTION 0.2 - DEFINITIONS

*Whenever possible, the company incorporates the definitions and regulatory jargon of each jurisdiction in which it operates into operations manuals and training documents. For dispensaries in the State of Hawaii, please note the following list terms used throughout this manual that are listed in the definitions:*

- *Batch*
- *Department*
- *Dispensary Facility*
- *Manufactured Marijuana Product*
- *Primary Caregiver*
- *Qualifying Patient*
- *Registered employee of a dispensary or Authorized employee of a dispensary*
- *Subcontractor*

*While this list is not all-inclusive, the company strives to ensure that all documentation and training materials are consistent with DOH definitions and language.*

### SECTION 0.3 - LICENSING

*The Green Solution is applying for one of three licenses available in the City and County of Honolulu. If granted a license to operate dispensary facilities in Honolulu, this Operations Manual will govern the actions, roles and responsibilities of registered employees of a dispensary or production center. It is understood that all information and statements made in the Operations Manual as inclusions to the application, become conditions of the license and the company will adhere to all requirements set forth in this manual and as published by the Department.*

**SUBSECTION 0.3.A - 11-850-15 MINIMUM QUALIFICATIONS FOR APPLYING ENTITY**

*In compliance with the requirements listed in 11-850-15 Minimum Qualifications for Applying Entity, the company will ensure that all owners, principals or members are over 21 years old and have no criminal history of felony convictions or other restrictions outlined in the rule.*

**SECTION 0.4 - BACKGROUND CHECKS 11-850-17**

*In compliance with the requirements listed in 11-850-17 Background Checks, the company will ensure that all owners, principals or members, all dispensary employees, subcontractors and subcontractor employees, as well as authorized service providers undergo a background check in order to be listed for approved access to any dispensary facility.*

**SUBSECTION 0.4.A - WRITTEN CONSENT & INFORMATION SECURITY**

*Persons seeking permission to access a dispensary facility must complete a written consent and provide unique, identifying information to the company to perform a background check. Furthermore, they must authorize the company to share the results with the Department and any third-party background check service provider for the sole purpose of compliance with 11-850-17. The company will retain written authorizations, digital records of unique, identifying information and/or background check results in a secure manner through the use of locked files and/or by maintaining digital records on secure servers with restricted access to data for a period no less than one year and up to 5 years.*

**SUBSECTION 0.4.B - DEPARTMENT-APPROVED LIST**

*All persons who undergo a background check and are authorized by the company to perform services at a dispensary facility or production center will be reported to the Department to be added to the current, Department-approved list of providers, including those who perform construction, maintenance, repairs, provide legal counsel or investors as required by 329D-16 and 329D-17.*

**SUBSECTION 0.4.C - VISITOR'S LOG**

*All persons who are authorized by the company to perform services at a dispensary facility or production center must undergo a background check, be added to the current, Department-approved list of providers and be logged on the Visitor's Log to include the first and last name of the authorized person, date/time of entry and exit, purpose for entry, and the name of the dispensary employee escort as required by 329D-16 and 329D-17. When practicable, it is preferred for a manager to act as the escort, however any authorized employee of the dispensary facility may be an escort. Completed Visitor's Logs are considered part of business operation records and will be retained for a period of 6 years per 11-850-41.*

**SUBSECTION 0.4.D - DEPARTMENT NOTIFICATION OF ARRESTS & CONVICTIONS**

*In compliance with 11-850-17, the company will report any arrests and/or convictions of owners, principals or members, dispensary employees, subcontractors and subcontractor employees, as well as authorized service providers made known to the company by means of self-reporting or through regular checks annually to the Department electronically via email or by any means required by the rules.*

**CHAPTER 1 - OPERATIONS (SUBCHAPTER 3)**

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 3 Operations, for overall dispensary operation and management.*

**SECTION 1.1 - DISPENSING FACILITY MANAGER RESPONSIBILITIES**

*The dispensing facility manager, also commonly referred to as the "Retail General Manager" or "General Manager" in company policies and procedures is responsible for the primary oversight of the retail dispensing location, including day-to-day operations, inventory control systems, including the POS system and BioTrack THC and compliance with DOH rules. Should any company policy, document or training manual use the terms "Retail General Manager" or "General Manager" it*



is hereby understood that the person in that role is the dispensing facility manager for the purposes of compliance with the Hawaii Administrative Rules and they are responsible for enforcing all policy, procedure and legal requirements.

**SUBSECTION 1.1.A - NO TOUCHING OR HANDLING PERMITTED**

As outlined in 11-850-31(a), no persons other than registered employees of the dispensary or subcontractor shall be permitted to handle marijuana and manufactured marijuana products prior to sale. Upon completion of the sale, qualifying patients and caregivers will receive the product and act as the final link in the chain of custody from seed to sale.

**SUBSECTION 1.1.B - NO LOITERING FOLLOWING SALE**

Registered employees of the dispensary are responsible for ensuring qualifying patients and caregivers do not loiter upon the facility following the completion of the sale in compliance with 329D-15. Employees should immediately alert the General Manager of any qualifying patients or caregivers who do not exit the facility timely following completion of the sale.

**SECTION 1.2 - RETAIL DISPENSING LOCATIONS 11-850-33**

The Department has outlined in 11-850-33 specific requirements for retail dispensing locations. It is the policy of the company to comply with all tenets of the retail dispensing locations requirements, as detailed in the following subsections.

**SUBSECTION 1.2.A - NO DISPENSING PRIOR TO LICENSING**

The company is committed to adhering to all regulatory standards, therefore registered employees of the dispensary are prohibited from dispensing marijuana or manufactured marijuana products prior to the receipt of all required licenses from the DOH, Narcotics Enforcement Division and local agencies.

**SUBSECTION 1.2.B - FACILITY TO REMAIN LOCKED AT ALL TIMES**

In order to ensure the safety of registered employees of the dispensary, qualifying patients and caregivers the General Manager is responsible for guaranteeing that the facility remains locked at all times. It is a violation of company policy to loan keys, security access codes or provide unauthorized access to the retail dispensing location. Employees who violate company policy and/or the Administrative Rules may be issued a Security Violation and be subject to disciplinary action, up to and including termination or legal action as defined in the Administrative Rules.

**SUBSECTION 1.2.C - HOURS OF OPERATION & HOLIDAY CLOSURES**

The retail dispensing location will be open for business during permitted hours of operation from 8 a.m. - 8 p.m. HST Monday through Saturday. Additionally, the dispensary is closed for business on Sundays, state and federal holidays listed as follows:

2016 Federal Holidays	2016 State Holidays
Friday, January 1: New Year's Day	Friday, March 25: Prince Jonah Kuhio Kalaniana'ole Day
Monday, January 18: Birthday of Martin Luther King, Jr.	Friday, March 25: Good Friday
Monday, February 15: Washington's Birthday	Friday, June 10: King Kamehameha I Day
Monday, May 30: Memorial Day	Friday, August 19: Statehood Day
Monday, July 4: Independence Day	Tuesday, November 8: General Election Day
Monday, September 5: Labor Day	
Friday, November 11: Veterans Day	
Thursday, November 24: Thanksgiving Day	
Monday, December 26: Christmas Day*	
*December 25, 2016 (the legal public holiday for Christmas Day), falls on a Sunday. Most federal offices will be closed on Monday, December 26, 2016, in observance of Christmas Day.	

**SUBSECTION 1.2.D - 24-HOUR SECURITY**

The retail dispensing location will be under 24-hour security, including the use of video surveillance systems, alarm monitoring, and remain locked when not open for business. Security measures are further outlined in Subchapter 4 Security.

**SUBSECTION 1.2.E - PATIENT IDENTIFICATION REQUIREMENTS & SIGN-IN POLICY**

In order to ensure marijuana and manufactured marijuana products are only dispensed to qualifying patients and caregivers, registered employees of the retail dispensing location will verify the identification of the patient, including a valid, government-issued photo identification AND a valid medical use of marijuana registry card issued by the Department, see figure 1.



Figure 1 Example Hawaii Drivers Licenses

The company is required to maintain a log of qualifying patients and caregiver entry and exit of the dispensary. The General Manager is responsible for creating reports from the POS system to log entry and exit in accordance with 11-850-51.

**SUBSECTION 1.2.F - LICENSE ON DISPLAY**

In the spirit of transparency and regulatory compliance, the General Manager is responsible for ensuring that a current copy of all valid licenses required for operations are kept on display in the designated display area.

**SUBSECTION 1.2.G - NO DIRECT ACCESS**

To protect patient safety and prevent direct access to products prior to sale, all marijuana and manufactured marijuana products are stored in locked, secured display cases with rear access to registered employees of the dispensary only.

**SUBSECTION 1.2.H - RETAIL DISPENSING LOCATION RESTRICTIONS**

Public safety and the prevention of diversion are extremely important to the company. As such, the company will not provide free samples, dispense premade or manufactured products in a form ready for smoking, or provide gifts or premiums of supplies or paraphernalia for smoking.

**SECTION 1.3 - DISPENSARY EMPLOYEES 11-850-34**

The Department has outlined in 11-850-34 specific requirements for dispensary employees. It is the policy of the company to comply with all tenets of the rules, as detailed in the following subsections. Failure to comply with dispensary employee rules from the Department is a Compliance Violation and employees may be subject to discipline, up to and including termination.

**SUBSECTION 1.3.A - NO EMPLOYEES UNDER 21 YEARS OLD**

*The company is committed to adhering to all regulatory standards, including ensuring that no person under 21 years old is employed in a dispensary facility.*

**SUBSECTION 1.3.B - IDENTIFICATION BADGE REQUIRED**

*Registered employees of a retail dispensing location are required to wear a company-issued photo identification badge with the name and photo visible at all times, while on company property of the dispensary facility.*

**SUBSECTION 1.3.C - ANNUAL EMPLOYEE TRAINING**

*Registered employees of a retail dispensing location receive training upon hire and annually to include a wide variety of topics, listed as follows:*

- *Health, safety and sanitation standards*
- *Security*
- *Prohibitions and Enforcement*
- *Confidentiality*
- *Any other compliance topics*

**SUBSECTION 1.3.D - EMPLOYEE LIST TO DEPARTMENT**

*In order to register employees, the company will provide a list of all names of employees to the Department. Additionally, the General Manager is responsible for reporting staffing changes to the Department within 24 hours of employment or separation.*

**SECTION 1.4 - EMPLOYEE RECORDS 11-850-35**

*All employees are required to use the designated timekeeping software or device to clock in and out upon the commencement of each scheduled shift, at break times and meal periods, and anytime the employee leaves the dispensary facility and returns to work.*

**SUBSECTION 1.4.A - EMPLOYEE TRAINING RECORDS**

*In order to ensure employees receive high-quality, thorough training upon hire and refresher training annually or more frequently as determined by the General Manager, the company will retain employee training records for a period no less than 6 years, as required by 11-850-41 Record retention.*

**SECTION 1.5 - TRANSPORT 11-850-36**

*Preventing diversion and maintaining a solid chain of custody throughout the cultivation, processing and dispensing cycle is important to protecting public safety and qualifying patients. Ensuring that all marijuana and manufactured marijuana products are transported in accordance with Department rules is critical to the success of the company. The company will only transport marijuana and manufactured marijuana products between licensed facilities and between company-owned licensed facilities and a laboratory for testing.*

**SUBSECTION 1.5.A - MINIMUM OF 2 EMPLOYEES FOR TRANSPORT**

*To assure the security and safety of marijuana and manufactured marijuana products during transport, each transport requires a minimum of 2 employees to accompany the products to the final destination of a retail dispensing location or processing center.*

**SUBSECTION 1.5.B - MANIFEST REQUIREMENTS**

*To assure the security and safety of marijuana and manufactured marijuana products during transport, a transport manifest produced by an authorized employee must accompany the products to the final destination of a retail dispensing location or processing center. The manifest shall include an itemized listing of all marijuana and manufactured marijuana products transported and any other data points required by the Department to be included on the manifest produced using BioTrack*

THC, the state-required seed-to-sale tracking system. Additionally, employees are strictly prohibited from transporting marijuana and manufactured marijuana products that are not listed on the manifest. Failure to abide by the manifest requirements is considered a Compliance Violation and employees are subject to disciplinary action, up to and including termination.

#### **SUBSECTION 1.5.C - TRANSPORT CONTAINERS**

To assure the security and safety of marijuana and manufactured marijuana products during transport, all products are transported in secure containers with a copy of the manifest inside the container and affixed to the outside of the container also. Secure containers may include cardboard shipping boxes secured with tamper-evident tape or another similar container that meets all Department standards.

#### **SUBSECTION 1.5.D - TRANSPORT CONTAINERS PREPARED IN VIEW OF CAMERAS**

As part of a stringent transport plan that ensures quality control, all transport containers must be prepared in plain view of designated surveillance cameras, including packing, loading and unloading of marijuana and manufactured marijuana products, placement of the manifest inside and attachment to the container or preparation of samples for transport to a laboratory. General Managers are responsible for ensuring that all components of the surveillance system, such as cameras, remain fully operational during any period of business operations in compliance with this Subchapter 3.

#### **SUBSECTION 1.5.E - GENERAL TRANSPORT REQUIREMENTS**

Production center employees are required to adhere to all general transport requirements and prohibitions set forth in 11-850-36, including the following:

- Maintain the quality and safety of marijuana and manufactured marijuana products during transport
- Ensure that any discrepancies between product received and the itemized manifest are immediately reported to the Department by the General Manager or laboratory receiving samples for testing
- Make no stops that deviate from the manifested origination and destination locations (fueling, meal periods and vehicle maintenance should occur at times when employees are not manifested with marijuana and manufactured marijuana products)
  - In the event of a vehicle breakdown, roadside emergency or other unforeseen circumstance that impacts the original transportation route or transport vehicle operability, employees should immediately contact the General Manager for further instruction
- Adhere to the pre-determined designated route listed on the manifest to reduce the possibility of theft or diversion

#### **SUBSECTION 1.5.F - GENERAL TRANSPORT PROHIBITIONS**

Production center employees are required to adhere to all general transport prohibitions set forth in 11-850-36 (k), including the following:

- No Delivery - Employees are prohibited from transporting marijuana and manufactured marijuana products off site to qualifying patients or caregivers
- No Inter-Island Transport - Employees are prohibited from transporting marijuana and manufactured marijuana products off site to other counties or islands
- No Transport on Federal land - Employees are prohibited from transporting marijuana and manufactured marijuana products on federal lands, including any federal fort, arsenal, national park or forest, or other federal land

### **SECTION 1.6 - INSPECTIONS 11-850-37**

Inspections are an important tool for protecting public safety and qualifying patients. Ensuring that all marijuana and manufactured marijuana products are produced, handled and dispensed in accordance with Department rules is critical to the success of the company and to maintaining compliance. The company has created the "Government Relations" training manual to address company policy regarding employee interactions with regulatory agencies, including the Department of Health, law enforcement, and OSHA among others. Employees should refer to Government Relations, Chapter 2 - Inspections for additional, detailed company policy.

**SUBSECTION 1.6.A - ANNOUNCED & UNANNOUNCED INSPECTIONS**

*The Department conducts an annual announced inspection and may conduct an unlimited number of unannounced inspections to ensure regulatory compliance. The General Manager is responsible for acting as the primary point of contact for inspections, however an owner or designated subcontractor may also act as a contact for inspections, as determined by the ownership structure.*

**SUBSECTION 1.6.B - EMPLOYEES PERMITTING ACCESS TO DEPARTMENT PERSONNEL**

*Registered employees of the dispensary are required to permit access to the entirety of the retail dispensing location to Department personnel or their designated agent, acting in their official capacity and on official business, for the purpose of completing an announced or unannounced inspection, follow-up inspection or other licensing requirement.*

*Access may include review of the property, equipment, dispensary records, documents and any substance, material or information that may affect compliance, upon the Department's request. Denying access to any of the previously listed items for inspection is a violation of the administrative rules and is considered a Compliance Violation and may subject the employee to disciplinary action, up to and including termination.*

**SUBSECTION 1.6.C - INSPECTION RECORDS & WRITTEN NOTICES FROM THE DEPARTMENT**

*Upon completion of an inspection, the Department provides written notice of the findings and/or any enforcement penalties or outcomes. As such, the General Manager should forward any written notices to the owners for further action. Failure to comply with written notices and/or failure to forward written notices to ownership is considered a Compliance Violation and may subject the employee to disciplinary action, up to and including termination. General Managers are expected to coordinate compliance efforts with ownership to ensure all written notices are addressed and ongoing compliance is maintained.*

**SECTION 1.7 - REPORTS 11-850-38**

*Quarterly reports assist the Department with transparent compliance and ensure that patient and public safety is of paramount importance to the company. General Managers are expected to coordinate efforts with ownership to create and/or gather records for quarterly reports to ensure compliance is maintained. The General Manager should prepare reports for the following due dates and corresponding dates ranges:*

- *JANUARY 15: Records for October 15 - January 14*
- *APRIL 15: Records for January 15 - April 14*
- *JULY 15: Records for April 15 - July 14*
- *OCTOBER 15: Records for July 15 - October 14*

**SUBSECTION 1.7.A - RECORDKEEPING FOR REPORTS**

*At the close of business on the day prior to submission, the General Manager is responsible for creating and/or gathering the following reports from the point-of-sales system, BioTrack THC, and any printed records:*

- *Entry/Exit Records*
  - *Employee timekeeping records showing clock in and out times, dates and employee names*
  - *Visitor's Log to include the first and last name of the authorized person, date/time of entry and exit, purpose for entry, and the name of the dispensary employee escort*
  - *Patient Log/Report to include the first and last name of the qualifying patient or caregiver, date and time of entry and exit*
- *Inventory Records*
  - *Sales Report to include amounts by category of marijuana and manufactured marijuana products sold*
  - *Waste Log to include a list of all destroyed marijuana and manufactured marijuana products, including weight and/or quantity, time/date of destruction and tracking information (batch number, etc.)*
- *Testing Records*
  - *Testing Report with lab test results for tests conducted of marijuana and manufactured marijuana products*

At the close of business on the day prior to submission, the ownership structure is responsible for creating and/or gathering the following records:

- Financial Records
  - Summary Financial Statement, which may or may not include an Income Statement, Balance Sheet or Free Cash Flow Report

### **SECTION 1.8 - AUDITS 11-850-39**

The company will obtain an independent financial audit annually and report the findings in the 10<sup>th</sup> month of licensure, no later than 60 days prior to license expiration. If, at any time, the company's license is revoked, suspended, surrendered or expired a copy of the independent financial audit will be made available to the Department 30 following such event.

### **SECTION 1.9 - CONFIDENTIALITY OF INFORMATION 11-850-40**

Protecting patient information is critically important to the company and ensures a positive patient experience. Registered employees of the dispensary are required to safeguard and keep confidential all identifying patient information and debilitating medical condition in compliance with the rules and the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Employees receive training on HIPAA compliance in the DOH & Local Health & Safety Regulations training manual and are expected to abide by all HIPAA rules, 11-850-40 and company policies designed to keep patient information confidential.

### **SECTION 1.10 - RECORD RETENTION 11-850-41**

Thorough recordkeeping and archiving supports the mission of the company to provide high-quality medicine to patients with debilitating conditions in compliant manner. The Department has set forth incredibly stringent record retention standards and all employees are required to adhere to the standards, including retaining the following records for a period no less than 6 years:

- Inventory Tracking Records including transport of marijuana and manufactured marijuana products
- Sales Records indicating compliance will allowed quantities for dispensing
- Financial Records, including income, expenses, bank deposits and withdrawal and audit reports
- Entry/Exit Records
  - Employee timekeeping records showing clock in and out times, dates and employee names
  - Visitor's Log to include the first and last name of the authorized person, date/time of entry and exit, purpose for entry, and the name of the dispensary employee escort
  - Patient Log/Report to include the first and last name of the qualifying patient or caregiver, date and time of entry and exit
- Employee Records, including clock in and out times and training information

#### **SUBSECTION 1.10.A - SECURITY RECORDINGS**

The company is committed to Department compliance and will retain security records for a period of no less than one year. Records may be digital or analog, stored on-site or at an off-site location and be made available to the Department and law enforcement upon written request.

### **SECTION 1.11 - ALLOWED QUANTITIES FOR DISPENSING 11-850-42**

Qualifying patients and caregivers are limited in the quantity that may be dispensed to them during a 15-day period, per the Department. The POS system is programmed to deny purchases exceeded the allowed quantities for dispensing, commonly called "purchase limits," however employees and the General Manager are responsible for ensuring patients do not exceed the allowed quantity of 4 ounces during a consecutive 15-day period, and no more than 8 ounces during consecutive 30-day period.

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**SUBSECTION 1.11.A - VERIFYING PATIENT PURCHASES**

*The company is committed to adhering to the purchase limits set forth by the Department. In keeping with a spirit of compliance and transparency, registered dispensary employees are trained to verify a patient's purchase history in BioTrack THC, the state seed-to-sale tracking system as required. This verification will ensure the patient has not exceeded the allowed quantity in the allotted timeframe. If the patient has met or exceeded the allowed quantity, employees are prohibited from making the sale. Additionally, the POS system will be designed to prevent sales beyond the allowed quantity, without the ability to be manually overridden by staff.*

**SECTION 1.12 - DISPOSAL OR DESTRUCTION 11-850-43**

*All marijuana or manufactured marijuana product that is disposed of must comply with all company policies and the Hawaii Administrative Rules and be logged on the Waste Log/Disposal Log. Completed logs are archived for a period no less than 6 years to ensure all disposal information is retained in compliance with this subchapter and 11-850-41 Record Retention. It is the policy of the company to record identifying information of each disposal, including:*

- *A description of the products, including:*
  - *Quantity or weight*
  - *Strain*
  - *Variety of manufactured marijuana product*
  - *Batch number*
- *Reason or cause for disposal*
- *Method of disposal*
- *Date and time of disposal*

*Registered employees of the dispensary should inform the General Manager when weighing and logging waste on the Waste Log/Disposal Log and placing it in the designated medical marijuana waste receptacle, where it is stored until disposal. All waste weighing, logging and storage of the waste receptacle is within a restricted access area. As a best practice, this is usually a clearly-marked/identified waste receptacle with a secure lid, preventing the removal of waste prior to weekly disposal. This measure prevents diversion and/or theft by employees, subcontractors or unauthorized persons.*

*Items considered waste include, but are not limited to:*

- *Unused, unsold, contaminated or expired marijuana or manufactured marijuana products*
  - *An item is deemed expired, if the "Use By" date has passed*
- *All marijuana or manufactured marijuana products in the inventory at the time of revocation or surrender of a license*
- *Any other item deemed waste by the Department*

*Marijuana or manufactured marijuana products will be destroyed and disposed of in a manner the best practices stated below:*

- *Marijuana waste will be made unrecognizable and/or unusable by grinding the waste with non-compostable waste, such as soil, paper, or oil in a 1:1 ratio*
- *Expired lozenges, pills, capsules and other forms of manufactured marijuana products will be removed from the packaging and made unrecognizable or unusable by physical destruction using a mallet/hammer against a solid surface and then mixing the waste particles with non-compostable waste, such as soil, paper, or oil in a 1:1 ratio*
- *It is the responsibility of the registered employee of the dispensary to ensure that all waste is rendered unusable before disposal in the dumpster and/or trash compactor (if available)*
- *Dumpsters and/or trash compactors are generally maintained in fenced, secure areas and/or the dumpster or trash compactor is further secured with a locking device to prevent unauthorized access to waste*

*The General Manager is responsible for performing disposal or actively observing the employee performing the disposal, in person or via the dispensary surveillance system. The General Manager is responsible for logging all waste in the POS system and BioTrack THC for full transparency with the Department. All disposal should be conducted at least once weekly, at the*

end of business hours on Wednesday at 8 p.m. If necessary, due to the volume of waste, disposal may occur more than once weekly, at the end of business hours. The destruction and disposal of cannabis must be performed in a restricted access area and in full view of a surveillance camera.

## CHAPTER 2 - SECURITY (SUBCHAPTER 4)

The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 4 Security, for overall security in dispensary operation and management.

### SECTION 2.1 - MANAGER RESPONSIBILITIES FOR SECURITY

The General Manager is responsible for ensuring facility security and compliance with the Hawaii Administrative Rules. Additionally, they are responsible for enforcing all policy, procedure and legal requirements at the facility with employees, patients, regulators and the general public. It is company policy to issue a Security Violation to any employee, General Manager, subcontractor or subcontractor employee who violates security policies, security requirements listed in 11-850-51 or any criminal law on company property.

### SECTION 2.2 - REQUIRED SECURITY IN ALL DISPENSARY FACILITIES 11-850-51

The retail dispensing location will be equipped with all security features required by 11-850-51 of the administrative rules, which indicate that the company is responsible for ensuring that the security system and alarm system meet or exceed Department requirements, including the following features:

- A professionally-installed video surveillance system that records 24 hours per day, with digital video recordings (DVR) archived for no less than 1 year
  - The company will retain DVR as long as necessary for any pending criminal/law enforcement action, internal investigation, Division administrative investigation or legal proceeding for which the recording is relevant
- A backup capability for all video equipment
- A date and time stamp on all DVR
  - It is preferable to synchronize the surveillance system with the POS system and/or BioTrack THC seed-to-sale tracking system
  - General Managers should ensure that the timestamp does not significantly obscure the surveillance images
- DVR and cameras must be internet protocol (IP) compatible
- Unobstructed video surveillance of all enclosed dispensary areas, including where marijuana or manufactured marijuana products are produced, moved or stored, all point of sale areas, any room used to pack or unpack secured containers used for transport, the surveillance room where the DVR/surveillance system storage devices is located, entrances and exits from both indoor and outdoor locations, with appropriate lighting to allow for surveillance
  - Additionally, cameras have a minimum resolution capable of certain identification of persons and activities in any area of the dispensary, including the immediate surrounding area with clear visuals of license plates in the parking lot or exterior areas for perimeter security
- Surveillance equipment and DVR secured in a lockbox, cabinet, closet or secured in another manner to limit access and protect against tampering and/or theft
  - Company best practice is to maintain a designated, locked "Surveillance Room" where surveillance equipment used for playback, the DVR and a color printer to provide still images are all located
- General Managers are trained to use the system to print still images or export video to comply with any Department and/or law enforcement request for access to records in support of an investigation

#### SUBSECTION 2.2.A - ALARM SYSTEM REQUIREMENTS

To protect the retail dispensing location, the facility is equipped with a professionally-installed alarm system that meets or exceeds Department requirements, including detection of unauthorized entry and provides notification to either a security monitoring company and/or law enforcement, in the case of an emergency. General Managers and other management staff



are the only authorized users permitted to arm and disarm the alarm system. Registered dispensary employees are not permitted to operate the alarm system, except in the case of an emergency where they may activate a silent alarm, duress alarm or otherwise use it to summon law enforcement or other emergency responders. The system is equipped with a minimum of 4 hour battery backup power to maintain system operations in a power outage and is activated 24/7, enabling the system to be armed at any time.

#### **SUBSECTION 2.2.B - AUTHORIZED ENTRY REQUIREMENTS**

Only designated persons are authorized to enter a retail dispensing location, as defined by the Department, including qualifying patients and primary caregivers, registered employees of the dispensary, government employees in an official capacity on official business, subcontractors and subcontractor employees. Retail dispensing locations are NOT OPEN TO THE PUBLIC.

#### **SUBSECTION 2.2.C - COMMERCIAL-GRADE LOCKS AND INFRASTRUCTURE**

To ensure the highest quality security measures, the company is committed to installing only commercial-grade locks and infrastructure, including functioning mechanical and/or electrical security devices. General Managers are responsible for immediately alerting the ownership structure of any inoperable, damaged or failing locks or security devices to enable the expedient restoration of service. Additionally, if there is a breach or failure of the security system, the General Manager is responsible for suspending operations immediately and physically securing the facility by manually locking, doors, windows, safes, display cases and any other storage area holding marijuana or manufactured marijuana products. The General Manager is responsible for immediately notifying the Department of any breach or failure, as well as notifying them once the system is restored and the dispensary returns to full operations.

### **SECTION 2.3 - REQUIRED SECURITY IN RETAIL DISPENSING LOCATIONS 11-850-53**

The retail dispensing location will be equipped with all security features required by 11-850-53 of the administrative rules, including the following features:

- Each retail dispensing location is designed with a public reception area where qualifying patients are screened and check-in occurs that is separated from the sales area by a locked entry point, usually secured by a magnetic door contact lock, commonly known as a "buzzer-style" lock. A registered employee may press a button to release the lock and permit access to the secured room for sales also known as the "sales area," once they have verified the patient or caregiver's valid, government-issued identification and valid medical use of marijuana registry card issued by the Department. The same is true for providing access to any other authorized person required to show identification and be logged on the Visitor's Log.
- Each location is designed with a secured room for sales, aka the "sales area," equipped with built-in, locked/secured display cases that permit patients to view products but not touch, handle or otherwise access them until after the completion of the sale
- Through the establishment of dispensary operations best practices, The Green Solution model is to provide a 1:1 dispensary employee to patient ratio. If business operations demand, the company may amend practices to permit no more than the maximum patient to employee ratio of 2:1 as permitted by 11-850-53
- Long-term storage of marijuana or manufactured marijuana products is restricted to the secure vault and it is company policy that only management, owners and authorized service providers are permitted access to the vault
  - Should a registered dispensary employee require access to the vault for regular sanitation (sweeping, mopping, etc.) they must be accompanied by the General Manager or directly supervised using the surveillance system
- Adequate exterior lighting sufficient to illuminate all areas under surveillance, including parking lots, building exteriors, walkways and waste receptacles

## CHAPTER 3 - TRACKING REQUIREMENTS (SUBCHAPTER 5)

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 5 Tracking Requirements, for overall inventory management and tracking in the retail dispensing location.*

### SECTION 3.1 - MANAGER RESPONSIBILITIES FOR TRACKING

*The General Manager is responsible for ensuring all inventory of marijuana and manufactured marijuana products is tracked in the state-required seed-to-sale tracking system, BioTrack THC. The Green Solution POS system will interface with BioTrack THC to maintain real time, 24-hour access to inventory, sales and patient data, as required by 11-850-61. In addition to inventory, sales and patient data, the General Manager is responsible for entering disposal/destruction data into the POS system and BioTrack THC and/or verifying that shared data between the systems is accurate. The POS system will feature a cap to automatically prohibit sales in excess of the allowed quantity for purchase. Employees should refer to Section 1.11 - Allowed Quantities for Dispensing 11-850-42 for additional information on purchase limits.*

*Additionally, if there is a breach or failure of the tracking system, the General Manager is responsible for suspending operations immediately and physically securing the facility by manually locking, doors, windows, safes, display cases and any other storage area holding marijuana or manufactured marijuana products. The General Manager is responsible for immediately notifying the Department of any breach or failure, as well as notifying them once the system is restored and the dispensary returns to full operations.*

## CHAPTER 4 - LABORATORY CERTIFICATION, TESTING, AND STANDARDS (SUBCHAPTER 7)

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 7 Laboratory Certification, Testing, and Standards, for product safety in the retail dispensing location.*

### SECTION 4.1 - MANAGER RESPONSIBILITIES FOR TESTING

*The General Manager is responsible for ensuring all inventory of marijuana and manufactured marijuana products is tested and test results are updated in the state-required seed-to-sale tracking system, BioTrack THC and the POS system. The Green Solution POS system will interface with BioTrack THC to maintain real time, 24-hour access to testing data as part of inventory data, as required by 11-850-61. In addition to input of current testing data, the General Manager is responsible for verifying that shared data between the systems is accurate.*

#### SUBSECTION 4.1.A - SECONDARY TEST SAMPLE

*To ensure that the Department has a control sample available to verify the results of any potency or contaminants performed, the production center will retain a secondary test sample in a secure, tamper-proof manner from the same batch. Secondary test samples will be kept in the vault of the production center for a period no less than (INSERT TIMELINE HERE).*

#### SUBSECTION 4.1.B - TESTS PERFORMED

*In compliance with all Department rules, the company will ensure that all required testing is performed on each batch of marijuana or manufactured marijuana products. Tests performed are itemized in the chart on the following page. Additionally, the company will comply with and additional testing requested by the Department for verification, investigation or other purposes in accordance with 11-850-85.*

<b>Tests Performed and Permissible Levels of Contaminants</b>	
<b>Chemical Profile (Potency Tests)</b>	Δ 9 (delta 9) - Tetrahydrocannabinol (THC) Tetrahydrocannabinol Acid (THCA) Cannabidiol (CBD) Cannabidiolic Acid (CBDA) Cannabigerol (CBG) Cannabinol (CBN)
<b>Contaminants Tests and Permissible Levels</b>	Heavy Metals: Arsenic 10.0 ppm Lead 6.0 ppm Cadmium 4.0 ppm Mercury 2.0 ppm
<b>Pesticides and Permissible Levels</b>	Pesticides regulated by the U.S. Environment Protection Agency 1.0 ppm
<b>Solvents and Permissible Levels</b>	Butanes 800 ppm Heptanes 500 ppm Benzene** 1 ppm Toluene** 1 ppm Hexane** 10 ppm Total Xylenes (m,o,p-xylene) 1ppm **Contaminants in Solvents
<b>Visible Foreign Material</b>	Mold Hair Insects Metal Plastic Other adulterant visibly detected
<b>Moisture Content</b>	<15%
<b>Microbiological Impurities</b>	Total Viable Aerobic Bacteria: Unprocessed and Processed Materials: 10 <sup>5</sup> Colony Forming Unit (CFU)/g CO <sub>2</sub> and Solvent Based Extracts: 10 <sup>4</sup> CFU/g  Total Yeast and Mold: Unprocessed and Processed Materials: 10 <sup>4</sup> CFU/g CO <sub>2</sub> and Solvent Based Extracts: 10 <sup>3</sup> CFU/g  Total Coliforms: Unprocessed and Processed Materials: 10 <sup>3</sup> CFU/g CO <sub>2</sub> and Solvent Based Extracts: 10 <sup>2</sup> CFU/g  Bile-tolerant Gram Negative Bacteria: Unprocessed and Processed Materials: 10 <sup>3</sup> CFU/g CO <sub>2</sub> and Solvent Based Extracts: 10 <sup>2</sup> CFU/g  E. coli (pathogenic strains) and Salmonella spp.: Not detected in 1 g  Aspergillus fumigatus, Aspergillus flavus, Aspergillus niger : <1 CFU/g;  Mycotoxins: <20 µg (micrograms) of any mycotoxin per kg of material

**SUBSECTION 4.1.C - RETESTS AND REANALYSIS**

*Retests or reanalysis of test results may be performed upon the request of the company or the Department of the same batch of marijuana or manufactured marijuana products.*

**SUBSECTION 4.1.D - SAMPLE DISPOSAL OR DESTRUCTION**

*The company intends to contract with the laboratory to safely and compliantly destroy or dispose of any remaining marijuana or manufactured marijuana products upon the completion of required tests. If samples or waste is returned to the retail dispensing location erroneously, it will be treated as waste and disposed of according to Section 1.12 - Disposal or Destruction 11-850-43.*

**SUBSECTION 4.1.E - MULTIPLE TESTING LABORATORIES PERMITTED**

*If necessary for standard tests, retests or reanalysis of test results, the company may contract with more than one certified laboratory to perform one or more tests of marijuana or manufactured marijuana products.*

**SUBSECTION 4.1.F - CERTIFICATE OF ANALYSIS AND TEST RESULT RECORDKEEPING**

*Maintaining comprehensive records following completion of required testing ensures that the company and the Department may review and analyze product test results to ensure patient safety, public safety and identify areas of operational improvement. The General Manager or another designated registered employee of the dispensary is responsible for retaining all Certificates of Analysis in a labeled physical or digital archive for a period no less than 1 year.*

**SUBSECTION 4.1.G - FAILED TESTING/CONTAMINANTS IN EXCESS OF STANDARDS**

*If a batch of marijuana or manufactured marijuana products fail testing or contaminants are found in excess of the standards permitted in 11-850-85, shown in the "Tests Performed" chart, the batch will be quarantined in designated location in the vault of the production center. The control sample will be used to complete a retest or reanalysis. If a batch fails testing or contaminants are found in excess of the standards permitted in 11-850-85 upon completion of the retest or reanalysis, the entire batch of marijuana or manufactured marijuana products will be deemed waste and disposed of according to Section 1.12 - Disposal or Destruction 11-850-43 at the production center and will never be transported to the retail dispensing location.*

**CHAPTER 5 - SIGNAGE, PACKAGING, AND LABELING (SUBCHAPTER 8)**

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 8 Signage, Packaging, and Labeling, for public safety and product safety in the retail dispensing location. The company is responsible for ensuring that all exterior facility signage is in compliance with 11-850-91 and is limited to a single sign, no greater than 1,600 in<sup>2</sup> or approximately 11 ft<sup>2</sup> that features the business name in text with no pictures or illustrations, similar to the example shown below.*



**SECTION 5.1 - PACKAGING AND LABELING FOR RETAIL SALE**

The General Manager is responsible for ensuring all inventory of marijuana and manufactured marijuana products displays the required labeling and is packaged in Department-approved packaging in accordance with 11-850-92. Compliant packaging and labeling helps to ensure patient safety, prevent diversion and ensure public safety by preventing unauthorized access to medicine from children and pets. General Managers and registered dispensary employees are expected to use the Packaging and Labeling checklist provided and shown below.

**§11 – 850 – 92 - Packaging and Labeling for Retail Sale**

Verified ✓	Department Requirement	How the Requirement is Met	Department Regulation # (Legal Citation)
	Medical Marijuana must be in a package that is child-resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act	Packaging is child-resistant	§11 – 850 – 92 (a.1)
	Packaging is opaque so that the product cannot be seen from outside the packaging	Opaque Container	§11 – 850 – 92 (a.2)
	Packaging must protect the product from contamination and does not impart any toxic or harmful substance to the marijuana or manufactured marijuana product	Worker Protection Standards, sanitation efforts	§11 – 850 – 92 (a.3)
	Contains no more than ten milligrams tetrahydrocannabinol for one dose, serving, or single wrapped item	Potency Profile Label	§11 – 850 – 92 (a.4)
	Package is labeled using only black lettering on a white background with no pictures or graphics	Container Label	§11 – 850 – 92 (b.1.A)
	Label includes the net weight/volume and potency	Container Label	§11 – 850 – 92 (b.1.B)
	The dispensary licensee's license number and name of production center where contents were produced	POS Label	§11 – 850 – 92 (b.2)
	The batch number and date of packaging	Container Label	§11 – 850 – 92 (b.3)
	A computer tracking inventory identification number barcode generated by tracking software	Container Label	§11 – 850 – 92 (b.4)
	Date of harvest or manufacture and "Use by date"	Container Label	§11 – 850 – 92 (b.5)
	Instructions for use	Container Label	§11 – 850 – 92 (b.6)
	The phrases "For medical use only" and "Not for resale or transfer to another person"	Warning Label	§11 – 850 – 92 (b.7)
	The warning, "This product may be unlawful outside of the State of Hawaii and is unlawful to possess or use under federal law"	Warning Label	§11 – 850 – 92 (b.8.A)
	The warning, "This product has intoxicating effects and may be habit forming"	Warning Label	§11 – 850 – 92 (b.8.B)
	The warning, "Smoking is hazardous to your health"	Warning Label	§11 – 850 – 92 (b.8.C)
	The warning, "There may be health risks associated with consumption of this product"	Warning Label	§11 – 850 – 92 (b.8.D)
	The warning, "This product is not recommended for use by women who are pregnant or breast feeding"	Warning Label	§11 – 850 – 92 (b.8.E)
	The warning, "Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug"	Warning Label	§11 – 850 – 92 (b.8.F&G)
	The warning, "When eaten or swallowed, the effects of this drug may be delayed by two or more hours"		
	A disclosure of the type of extraction method, including any solvents, gases, or other chemicals or compounds used to produce the manufactured marijuana product	Disclosure Label	§11 – 850 – 92 (b.9)
	The name of the laboratory that performed the testing	Testing Label	§11 – 850 – 92 (b.10)
	That the product is not labeled organic unless permitted by the United States Department of Agriculture in accordance with the Organic Foods Production Act	Testing Label	§11 – 850 – 92 (c)

End of § 11 – 850 – 92

Please Note: All wording in quotes and highlighted in yellow must be quoted EXACTLY, per Department of Health regulations.

**SECTION 5.2 - ADVERTISING RESTRICTIONS 11-850-93**

*The company will abide by all advertising restrictions defined by the Department in an effort to ensure public safety and reduce the likelihood of misuse. This includes the creation of a website providing general information about the company, including contact information such as location and phone number, a list of products available for dispensing with details such as product name, testing information, instructions for use, extraction method and any other information permitted for use from 11-850-92.*

**SECTION 5.3 - NO PUBLIC VIEW**

*All marijuana and manufactured marijuana products offered for sale shall be displayed in locked display cabinets in the sales area of the retail dispensing facility and shall not be displayed in windows or in public view. All windows will feature window coverings adequate to prevent public view and ensure facility security.*

**CHAPTER 6 - ENFORCEMENT (SUBCHAPTER 9)**

*The Green Solution company policies are designed to be in compliance with all DOH regulations, including Subchapter 9 Enforcement, for public safety and product safety in the retail dispensing location. The company is responsible for ensuring that all remedies are adhered to and is committed to actively preventing suspension or revocation of the dispensary license.*

**SECTION 6.1 - MANAGER RESPONSIBILITY FOR ENFORCEMENT**

*The General Manager is responsible for taking receipt of any enforcement records of alleged violations received by certified mail or delivered in person to the retail dispensing location and forwarding them to the ownership structure. These records may include cease and desist orders, administrative penalties (fines) ranging from \$100 - \$1,000 and or a request for submission of an action plan to correct the violation.*

*The owners will coordinate efforts with the General Manager to ensure that all enforcement request are promptly and professionally complied with. If the company requests a hearing to address alleged violations, the General Manager or another designated registered employee of the dispensary may be requested to attend the hearing on behalf of the company. If an employee attends an administrative hearing, it is considered part of normal working conditions and the employee will receive standard wages during that time.*

**SUBSECTION 6.1.A - PAYMENT OF PENALTIES**

*The company is responsible for the timely payment of any administrative penalties assessed on the license or following the completion of a hearing where a penalty assessment is upheld, modified or otherwise enforced **within 20 days** of receipt of the written notice or following the completion of a hearing. If a General Manager fails to forward enforcement records to the owners within 24 hours of receipt they will be issued a Compliance Violation and may be subject to disciplinary action, up to and including termination.*

**SUBSECTION 6.1.B - SUSPENSION OR REVOCATION OF DISPENSARY LICENSE**

*If the dispensary license is suspended, the General Manager is responsible for coordinating with the owners to discontinue sales and dispensing, cease transporting marijuana or manufactured marijuana products and to implement a plan to maintain facility security during the closure.*


*If the dispensary license is revoked, the General Manager is responsible for coordinating with the owners to discontinue sales and dispensing, cease transporting marijuana or manufactured marijuana products and to implement a plan to destroy or dispose of all marijuana or manufactured marijuana products and enter destruction information into BioTrack THC and the POS system for tracking and recordkeeping purposes. Additionally, the owners are responsible for surrendering the license to the Department upon revocation.*

## CHAPTER 7 - CONCLUSION

*The Green Solution is deeply committed to patient service, public safety and product safety in all retail dispensing locations. This Dispensary Operations Manual is designed to adhere to all Department of Health rules, with an emphasis on the professional, compliant and safe operations of retail dispensing locations doing business as The Green Solution. Employee training and education on compliance topics and overall facility management and operations is critical to the success of the company. Each employee is responsible for understanding Department rules, daily compliance with policy, procedure and Department rules and providing the highest quality patient service possible.*

*Few businesses have the type of direct impact on patient quality of life that a dispensary can have. Through robust patient education initiatives, responsible dispensing through adherence to best practices and constant compliance with all applicable Hawaii law, rules and regulations, The Green Solution sets industry standards for excellence, quality and safety. Research and development of products and focusing on continual improvements of concierge-level customer service demonstrate the company's vision and mission to alleviate suffering for patients living with debilitating conditions.*

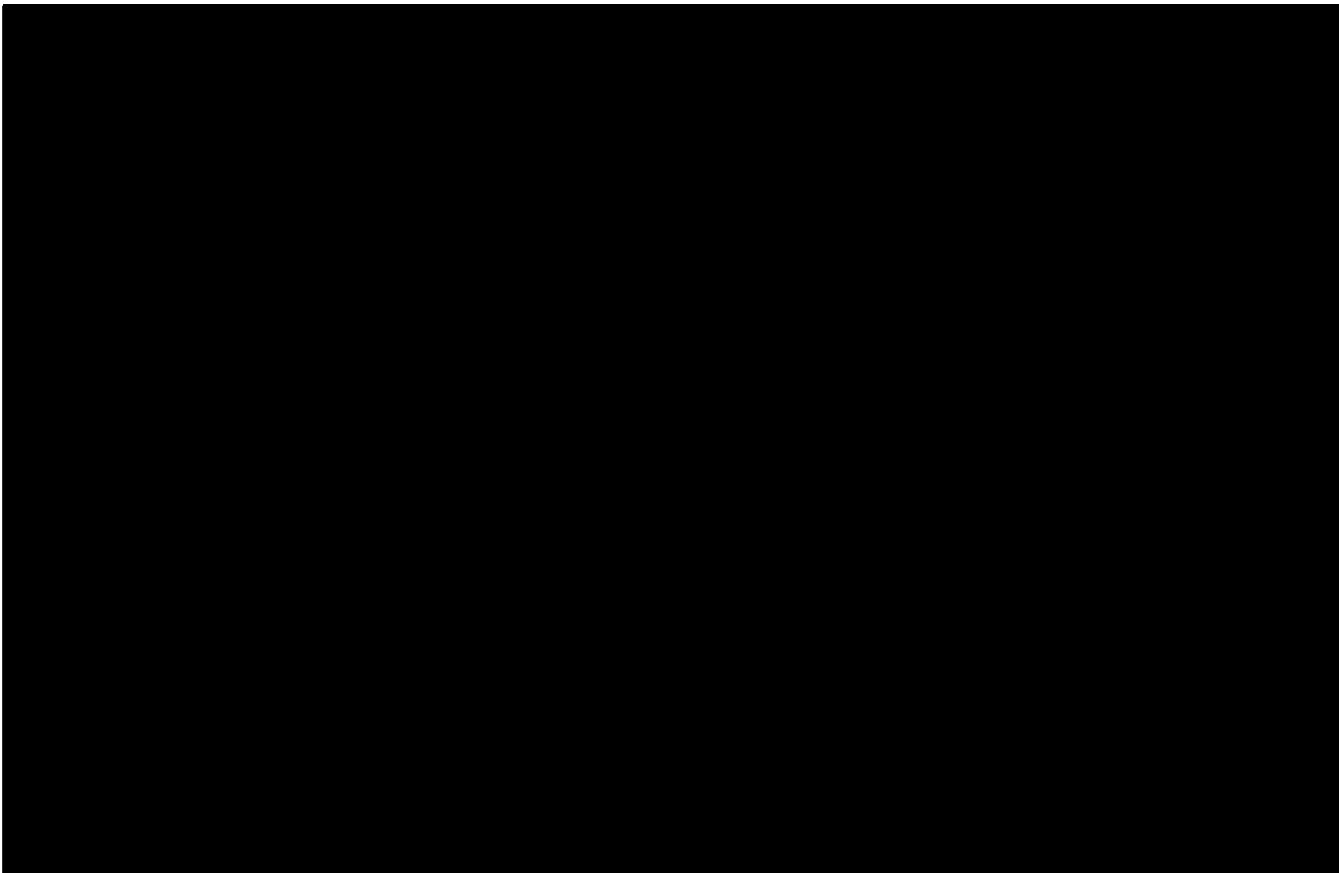
In order to ensure that CC Vet Services is able to service the patients of Hawaii as quickly as possible strategic partners have been brought into the Company which will allow capital to be deployed upon awarding of the license. Linda Nakagawa, a longtime resident and business operator in the State of Hawaii, is one of the principals brought into CC Veteran Services. With

 his positions CC Veteran Services with plenty of capital starting day one to start putting capital to work for the business. Please see the attached documents for supporting details.

As a continued provider of services to our returning veterans, CC Veteran Services has attached its summary of financial statements for each month of 2015. The Company continues to be in good standing with the State of Hawaii and pay taxes to ensure these veterans can come home to a place they can acclimate to society. Please see the attached documents for supporting details.

CC Vet Services Financial Plan

*Summary of P&L Forecasts*



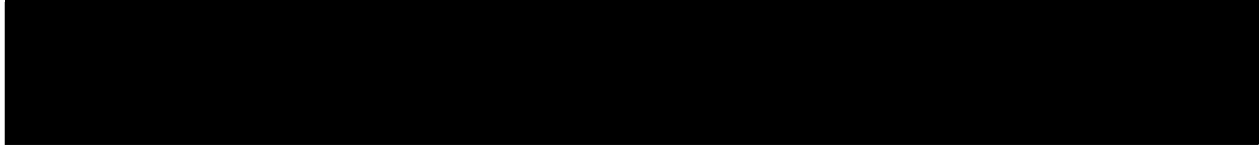


### ***Summary of Financial Planning Process***

CC Veteran Services prepared a 48-month (4-year) financial model in order to understand how this new business will be operated and to obtain insight into the entity's current and future financial, operational, and capital needs. This plan assumes and only makes projections and plans related to future cannabis operations. While modeling the scenarios, CC Veteran Services placed an emphasis on cash flow, ensuring the monthly cash 'low point' was sufficient to cover operating expenses of future months, satisfy working capital requirements, enable capital expenditures and meet estimated corporate income tax liabilities. We have included this in summary through the report and in detail in the attached. Our analysis encompassed the following major categories relating to the preparation and analysis of CC Veteran Services' four-year operational and financial plan:

1. Patient Demand & Revenue Drivers
2. COGS, Production & Inventory
3. G&A Expense: Assumptions Discussion
4. Sales & Marketing Expense: Assumptions Discussion
5. CAPEX Discussion

CC Vet Services – CC Veteran Services feels that with the credit history of the Founder and equity partner, Chris Cole, should provide certainty of the credit worthiness of the Company. The additional liquid and unencumbered assets of Linda Nakagawa adds additional stability to CC Veteran Services. See the attached documents for supporting details.



I Chris Cole, certify that I have [redacted] under the entity of CC Vet Services and that all information provided within these documents are both accurate and complete.

Applicant Name (print) Christopher Cole

Signature [redacted]

Date 1/29/16





































## Security & Surveillance

Patient and public safety is the highest priority of the company and coordinating with our partner, The Green Solution, empowers us to deploy the most state-of-the-art and industry-leading security plans in Hawaii as further outlined in the Government Relations, Auditing Overview, Vehicle Use, Surveillance System Use and Radio Procedures training manuals. As Colorado's foremost medical marijuana retailers, The Green Solution has been recognized for quality products by numerous awards constantly strives for greatness and to harness our passion to serve a diverse customer base. It is our focus on growth, robust technology and customer service that differentiates us from our competitors and ensures our continued success in the future. We provide a wide array of logistics and specialized support services. These services include state-of-the-art surveillance, advanced alarm systems, asset protection, regulatory compliance, health and safety training. Our company takes pride in its extensive and trainable security measures. CC Vet Services acknowledges its responsibility to maintain profitability by adequately training our staff in an effort to mitigate loss.

All of our licensed dispensary and manufacturing facilities are equipped with a security room, housing all professionally installed surveillance system equipment, which is secure and monitored 24 hours a day. Access to the security room is limited to Executive Officers, Operations Managers, General Managers, and approved contractors or other authorized personnel only.

The Video Insight Monitor Station is a viewing station capable of Video Management System (VMS) administration, as well as the display and export of video from any accessible IP server. Each Monitor Station will have between one and four 19-inch or larger monitors. Additional Monitor Stations can be added to the facility as needed to effectively display video feeds. Microsoft Active Directory (AD) will be utilized to provide centralized authentication and

authorization at the Monitor Stations to control access to the system and VMS administration tasks. The Monitor Station tree view will display the status of the connected IP Servers, custom camera layouts and facility maps. Facility maps are imported building diagrams that include an active overlay of the cameras, access control systems and other physical security controls superimposed on the building.

At all dispensing and manufacturing facilities, CC Vet Services installs silent alarm and duress alarm buttons that are strategically placed, allowing employees to activate alarms quickly and discreetly. Dispensary and manufacturing agents receive training that includes diagrams detailing the location of all alarm and activation buttons in the facility. This also includes fire alarms. All alarms are regularly tested in adherence to law and CC Vet Service's internal policy.

Ensuring these measures are in place is crucial to increasing safety and security in our dispensaries and manufacturing facilities. Silent alarms allow agents to notify law enforcement agencies of an emergency without drawing attention to themselves and further escalating a severe situation. In the event of an armed robbery or active shooting, our agents are trained to remain calm and minimize the chance for harm. This means valuing human life over company assets. Additionally, any security staff present at a dispensary or manufacturing facility can be trained to respond appropriately in asset protection capacity.

CC Vet Services will maintain security personnel on-site at the dispensary or manufacturing facility during both operational and non-operational hours. It is the experience of our company that having security personnel on-site at our manufacturing facility during both operational and non-operational hours significantly reduces the possibility of a security breach. Our security training includes knowledge in routine emergency procedures, apprehension of felony suspects, procedures for disaster situations, security surveys and evaluations, and crowd control

tactics. Personnel are trained to operate and maintain camera systems to facilitate investigations and manipulate cameras for the purpose of recovering footage to provide digital copies that aid law enforcement investigations. A key component to our success in the medical marijuana security industry has been our extensive professional working relationship with all aspects of emergency services, including local law enforcement, fire, and EMS – a strategy that can be emulated in Hawaii. The primary duty of our security personnel is the safety and welfare of the assigned site and its employees and customers. This includes, but is not limited to, all assets, extension facilities, parking facilities and physical property within the ownership of the dispensary or manufacturing facility.

The use of perimeter checks on regular intervals helps ensure that the exterior of the dispensing or manufacturing facility and surrounding neighborhood are also safe, allowing for patients to access the facility and feel comfortable and at ease doing so. Our experience has shown that if a patient perceives that facility is unsafe, has a poorly maintained exterior, or is located in an unsavory neighborhood, they will not enter the facility. In order to combat these stereotypes or misperceptions, we ensure that security personnel have a visible presence to patients; that the facility is maintained properly to ensure all doors, locks, windows, and other infrastructure are in good repair; and that they protect the patients and products.

Additionally, use of dual-access security systems, which require two employees to open a secure room where medical marijuana is stored, further deters and prevents diversion, theft or loss of regulated product. Security companies who offer cookie cutter solutions to dispensaries are unable to customize solutions to meet the specific needs of dispensary clients. In contrast, we only specialize in marijuana security services.

Our dispensaries are separated into different, clearly marked rooms with varying levels of security clearance to ensure efficient and compliant operations. Qualifying patients have one-on-one time with a specific Dispensary Agent upon arrival, while other patients remain in a secure waiting room to be screened for entry once the other patient's dispensary experience is complete. In the waiting room, qualifying patients must show a government identification card, as the Dispensary Agent must cross reference their name with the medical marijuana registry to ensure qualification.

Medical marijuana and manufactured marijuana products are stored in a secure room, referred to as the vault, where the dispensary manager is the only dispensary agent with the ability to access its content. This room is closed off to the rest of the dispensary and locked at all times, and only approved personnel are allowed to access it. Medical marijuana preparation and packaging is conducted in a room physically separated from the rest of the dispensary. This room is accessible to dispensary agents for inventory replenishment purposes, but dispensary processing agents should be the only employees occupying the room for an extended amount of time. A common area for dispensary agents to take breaks and eat meals is offset from the rest of the dispensary to allow for a calm and relaxing environment. Company memoranda and other pertinent information is posted in this room for all dispensary agents to read. This room is only accessible by keypad code to dispensary agents and is not visible to patients or the general public.

CC Vet Services utilizes proprietary point of sale software, in addition to the state-designated seed-to-sale tracking system, to monitor and track all medical marijuana from the time it is delivered or produced to the time it is delivered to another licensee, a licensed grower or a qualifying patient or caregiver. Our point of sale software and the seed-to-sale tracking system enable automatic, HIPAA-compliant, offsite storage of all patient records, ensuring safety and

security of sensitive information and advanced inventory control monitoring serviced by an Inventory Control Specialist responsible for monitoring, ordering, and maintaining appropriate levels of manufactured marijuana product inventory at all dispensing facilities.

Upon the depletion of a dispensing organization's medical marijuana inventory, the inventory control specialist will enter the appropriate amount of medical marijuana inventory into a virtual holding area in the point of sale. Upon transport of the actual, physical manufactured marijuana product to the dispensing facility, the dispensary manager will confirm accurate receipt of the product, thus eliminating any potential errors in inventory tracking and establishing an additional checks and balances feature. Our manufactured marijuana product barcodes function throughout the life of the plant, connecting all the way through cultivation to final sales at the dispensary. Records reflect the chain of custody throughout the entire process.

CC Vet Services continues to demonstrate that successful operations, profitability and future success is dependent upon a clear, strategic understanding of the medical marijuana industry. Our expertise in all aspects of regulatory compliance and medical marijuana production confirm the likelihood of success in the state of Hawaii. Through mastering manufacturing and production, dispensing, creating highly-effective marketing campaigns and retaining customers for years, we have the skills, knowledge and capacity to create profitability as well as tax contributions that will benefit the community and state as a whole. As our company grows, we will monitor that growth from our centralized corporate command center, where we will continue to live our mission statement and change the perceptions of what a medical marijuana company can be.









# SURVEILLANCE SYSTEM OVERVIEW

A-5



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Icon Key:

-  Files & Filing Cabinets
-  Forms & Checklists
-  Video

-  Test
-  Practical Application
-  TGS Portal
-  TGS Cloud

## CHAPTER 1 – BACKGROUND & PURPOSE

### SECTION 1.1 – SURVEILLANCE SYSTEM ACCESS (SECURITY ROOM)

All licensed facilities are equipped with a Security Room that is kept locked and monitored 24 hours a day, which houses all surveillance system equipment. Access to the Security Room is limited to Executive Officers, Operations Managers, General Managers, the Risk Analyst, approved contractors or authorized personnel only.

In upholding the core value of integrity, unauthorized access to the Security Room and misuse of video recordings or still images are violations of company policy and Team Members who violate this policy or provide access to unauthorized Team Members will be issued a Security Violation and are subject to disciplinary action, up to and including termination. Misuse includes saving, downloading or sharing video from the surveillance system with any unauthorized person(s) in any manner.

#### SUBSECTION 1.1.A – EMERGENCY ACCESS TO SECURITY ROOM

In case of an emergency requiring access to the security room, such as damage, flooding, etc. immediately contact an available Security Manager. In emergency situations, operations concern may be immediately escalated to an Executive Officer, if the manager is unable to contact a Security official or if the General Manager is unavailable.

#### SUBSECTION 1.1.B – LAW ENFORCEMENT COORDINATION

Security is responsible for coordinating with law enforcement in support of criminal investigations or for other official purposes. Facility managers should contact a Security Manager, if a law enforcement agency is requesting access to the Security Room directly. If the manager is an Assistant Manager or does not have keys to the security room, politely inform them that to gain access, the authorized personnel have been contacted and that they will arrive shortly.

#### SUBSECTION 1.1.C – BATTERY BACKUP & POWER OUTAGES

Facility managers should contact Security personnel in the event of a power outage. Depending upon the length of the power outage, they will receive further instruction at that time. All facilities are equipped with battery backup for a minimum of 4 hours, per Department requirements.

## CHAPTER 2 – EQUIPMENT REQUIREMENTS

### SECTION 2.1 – VIDEO SURVEILLANCE EQUIPMENT

All licensed facilities are equipped with video surveillance equipment, which meets or exceeds Department requirements. This equipment includes a digital video recorder (DVR), cameras, video monitors, USB drives for archiving, and a color printer. All Video surveillance equipment is maintained so that playback quality is suitable for viewing and kept in a designated, locked and secured room referred to as the Security Room.



### SECTION 2.2 – DIGITAL VIDEO STORAGE

In accordance with regulations, all surveillance activities are recorded 24 hours per day and must be stored in digital video storage with a minimum of 40 days of consecutive recording kept on file, at all times. The Security team is responsible for auditing the surveillance system, ensuring ongoing maintenance and destroying or erasing all digital video prior to disposal. Facility managers and vendors are NOT permitted to erase or destroy digital video at any time and unauthorized Team Members who participate in or facilitate the destruction of video are in violation of company policy and subject to discipline.

#### SUBSECTION 2.2.A – TIME & DATE STAMP

A time and date stamp is required to be embedded, accurate, and synchronized with the POS system on all digital surveillance video. Retail Managers should place a ticket via the Ticketing System for correction by Security personnel, if the time and date are inaccurate.

**SUBSECTION 2.2.B – LIGHTING CONDITIONS**

*All equipment is capable of digital video recording in all lighting conditions and creating color, still images from those recordings, as required by the Department. Team Members should not consider video recording to be off in darkened rooms or areas of licensed facilities.*



**SECTION 2.3 – SYSTEM MAINTENANCE**

*Team Members may not alter, correct, adjust or otherwise maintain any equipment they are not specifically authorized to do so or make repairs they are not qualified to perform. At all times, Security is responsible for overall system maintenance. All system maintenance is performed by trained or qualified personnel or vendors, authorized by the corporate office and Executive Officers. For security purposes, the facility manager may request identification and contact the corporate office to verify the approval of any maintenance work and the identity of the vendor.*

**SUBSECTION 2.3.A – REPORTING ISSUES TO SECURITY PERSONNEL**

*Facility managers should report any issues to Security personnel via the Ticketing System for corrective action. Failure to report issues in surveillance system maintenance is a violation of company policy and may result in disciplinary action, up to and including termination. A complete and fully operational system is not only a Department requirement, but an important aspect of maintaining transparency within the industry.*

**SUBSECTION 2.3.B – AUTHORIZED TEAM MEMBERS AND VENDORS (SERVICE PERSONNEL)**

*All persons authorized to access the Security Room and perform system maintenance are identified on a current list of authorized personnel and kept on-site.*

**SUBSECTION 2.3.C – SYSTEM MAINTENANCE & SERVICE LOG**

*Additionally, all maintenance activity is logged and the log is kept on-site in accordance with Department rules and identifies the servicer, date and time of service and reason for service.*

**SUBSECTION 2.3.D – ESCALATING ISSUES TO MANAGEMENT & CORPORATE OFFICE**

*Facility managers who experience delays in repairs or corrective action by Security personnel, should escalate the matter by contacting a Security Manager directly, if not addressed within 72 hours of the item being reported via the Ticketing System. For those who do have resolution from a Security Manager, within 48 hours after escalation to them, should escalate the matter directly to an Executive Officer by phone for immediate resolution or to return the situation to compliance as quickly as possible.*

**SECTION 2.4 – CAMERA PLACEMENT POLICY**

*All cameras are placed in compliance with Department regulations. Retail Managers are not permitted to move cameras, change camera angles, or otherwise alter camera placement. Should outside conditions, such as wind, alter camera placement, the manager should report it via the Ticketing System to have Security personnel remedy it.*



**SUBSECTION 2.4.A – PLACEMENT ON INGRESS AND EGRESS**

*In compliance with Department rules, cameras are placed within 20 feet of entrances and exits and record both interior and exterior activity clearly. All access to the facility by all persons, including Team Members, is constantly monitored for safety.*

**SUBSECTION 2.4.B – PLACEMENT AT EACH POINT-OF-SALE**

*In compliance with Department rules, cameras are placed at each point-of-sale location or cash register kiosk, with the ability to clearly identify all persons in the video, including Team Members and patrons.*

**SUBSECTION 2.4.C – PLACEMENT IN PRODUCTION AREAS**

All weighing, preparation for distribution, packaging or other production activities must be performed in areas with surveillance cameras. Failure to complete duties in approved areas is a Security Violation and may result in disciplinary action, up to and including termination.

**CHAPTER 3 – COMPANY POLICIES**

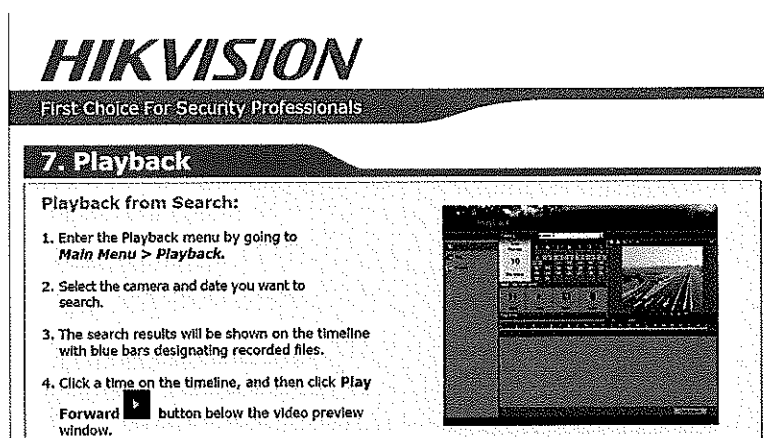
**SECTION 3.1 – FACILITY MANAGER PRIVILEGES**

Facility managers are limited in access to the surveillance system. The only authorized access by Managers is for business purposes, such as immediate video playback for security or safety matters. All facilities are equipped with a switch Managers may use to toggle between views. Managers may also login for basic playback functionality, but may not extract, download or copy digital video, unless requested to do so by Security management or law enforcement.

**SUBSECTION 3.1.A – SEARCHING, VIDEO PLAYBACK & EXPORTING USING HIKVISION DIGITAL VIDEO SYSTEM**

To playback video using the HikVision system, complete the following:

1. Right-click to access menus and login.
2. Login as "User 2" with the assigned location password.
3. Once logged in, click on "Main Menu."
4. Select "Playback" for video review.
  - a. Use the provided calendar to select date and time ranges for review.
5. Click "Start Clip" then "Stop Clip"
6. Click "Export" button
7. Insert the USB drive and select "USB" from the drop down menu
8. The USB can then be inserted into the computer in the manager's office to retrieve and print the files



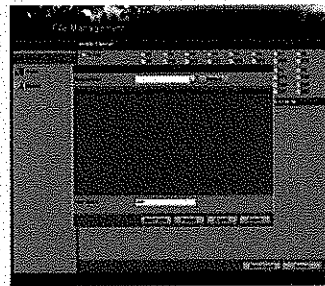
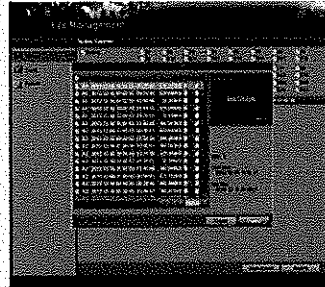
**SUBSECTION 3.1.B – EXPORTING BACKUP VIDEO USING HIKVISION DIGITAL VIDEO SYSTEM**

To export backup video for Department or law enforcement use, complete the following in the HikVision system:

## 8. Backup

### Backup recorded files (Export):

1. Enter the File Management menu by going to *Main Menu > File Management*
2. Place a check next to the cameras you want to search files for backup. Select the recording type, date and time range you want to backup. Click on *Search*.
3. A search results window will display your results. You may click the *Play* button to verify that these files are indeed the ones you would like to backup. The total size of backup files will be displayed in lower left hand corner.
4. Click the *Export* button.
5. Select device to backup to from drop-down list (USB Flash Drive, USB HDD, DVD Writer). If backup device is not recognized:
  - Click the *Refresh* button.
  - Reconnect the device.
  - Check for compatibility from vendor.
6. The total available free space will be shown. If the free space is not sufficient, delete files from the storage device or insert a device with more available free space.
7. Click the *Export* button to begin backup process. After the backup has completed, click the *OK* button.



### SECTION 3.2 – REMOTE ACCESS INTERFACE

The HikVision online remote access interface available online functions completely differently than the actual HikVision DVR system in the Security Room. Managers are responsible for ensuring the remote access system is operational and each Manager office computer has the internet plugin installed in their browser. For technical issues, contact the IT department for assistance.

#### SUBSECTION 3.2.A – SEARCHING & VIDEO PLAYBACK USING REMOTE ACCESS

To playback video using the HikVision online system, complete the following:

#### SUBSECTION 3.2.B – EXPORTING VIDEO USING REMOTE ACCESS

To export video for Department or law enforcement use, complete the following in the online system:



### SECTION 3.3 – CAMERA AND SYSTEM AUDITS

All auditing procedures to verify compliance with Department regulations and company policies are performed by Security Team Members. Audited items include use of activity logs, system maintenance, video storage dates, verification that system is operational and not damaged, and that camera angles are appropriate. Facility managers are expected to adhere to all recommendations made by Security personnel and take any corrective actions necessary for compliance, which are not related to surveillance system maintenance.

#### SUBSECTION 3.3.A – FACILITIES MAINTENANCE AND CORRECTIVE ACTION

Following an audit, inspection or other recommendation from Security personnel, facility managers are responsible for ticketing other departments for specialized assistance to take corrective action. For example, if a flood occurs and damages not only surveillance equipment, but also floors and walls, the facility manager is responsible for following up with the Facilities Maintenance team to repair the floors and walls, while Security personnel and the IT department will oversee repair or replacement of the surveillance equipment. The facility manager should coordinate with the Facilities Maintenance team to complete landscaping or building services, such as tree trimming, which may impact the optimal functionality of the surveillance system.

### SECTION 3.4 – ASSET PROTECTION BASICS

All licensed facilities are sources for asset protection concerns and the surveillance system is the most common way to identify loss from Team Members or patrons. Facility managers should remain cognizant of hand placement, behavior that seems strange or unusual and any action with personal belongings, such as purses or backpacks that appears out of place. Managers should immediately report any concerns to the Asset Protection Manager using the Ticketing System.

#### SUBSECTION 3.4.A – RETAIL STORE SECURITY

Retail Managers must monitor the exterior of the facility and parking lot during opening and closing times, to ensure Team Members enter and exit safely and to prevent loitering patrons outside of business hours. This is further discussed within the opening and closing security protocols listed in R4 - Retail Manager Policy Guide.

#### SUBSECTION 3.4.B – ACTIVITY IN PLAIN VIEW

Additionally, ensure Team Members understand that when working with sensitive information, cash handling, or product handling, they must complete tasks within plain view of the camera. Managers accepting deliveries of marijuana products should receive them within plain view of a camera. Whenever possible, do not block the line of sight when using the drop safe, the coinage safe, or at any other time when a clear view of Team Member activity is required.



#### SUBSECTION 3.4.C – PATRON REQUESTED CAMERA REVIEW

If a patron requests review of cameras for something such as lost items, discrepancies at the cash register, a car accident in the parking lot, for example, or if upon reviewing cameras, you find an inventory discrepancy, cash handling issue, or other concern, you must submit the concern with a timestamp, using the Tip Line on the TGS Portal, to create an Incident Report requesting the Asset Protection team review the cameras. After notifying the Asset Protection team, respond to the patron via telephone with whatever information the Asset Protection team provides, no later than the next business day. Video Information relating to patron requests must be released to law enforcement. **No videos, stills, etc. should be given to patrons under any circumstance, NO EXCEPTIONS.**

#### SUBSECTION 3.4.D – SECURITY HEIGHT DECAL

All retail stores are equipped with self-adhesive security height decals at entrances to identify the approximate height of persons who pose a real or potential security threat, as observed using the surveillance system. This is a useful tool used by the Asset Protection team during the investigation process and to provide detail to law enforcement, in the event of a criminal investigation.



## CHAPTER 4 – CONCLUSION

### SECTION 4.1 – FACILITY MANAGER RESPONSIBILITY REVIEW

*Facility managers are limited in access to the surveillance system, but are responsible for the maintenance of the facility surrounding it. Managers and Security Team Members work closely to ensure the security, maintenance and compliance of the Security Room, the surveillance system and the facility, as a whole. Facility managers must conduct appropriate follow-up and take necessary corrective actions in a timely manner, based upon Security personnel recommendations.*

### SECTION 4.2 – SECURITY PERSONNEL RESPONSIBILITY REVIEW

*Security Team Members are available to answer questions and provide guidance on company policy and Department regulations at all times, as they relate to the surveillance system. In addition, they are responsible for auditing, maintenance and corrective actions needed to ensure the ongoing operation of the system. They oversee the installation and compliance of all systems in new facilities and deploy updates, as regulations change. All final recordings are eligible to be reviewed for internal affairs purposes, and it is prohibited for any Team Member to perform “self-reviewing.” Recordings are kept confidential at all times.*

### SECTION 4.3 – COMPANY RESPONSIBILITY

*TGS Management is responsible for the infrastructure and overall management of all facilities, including the surveillance system, all equipment and supplies necessary for compliance. If facility managers and Team Members adhere to the reporting policies for facilities maintenance, the company can address any infrastructure issues promptly, resulting in safe, secure and fully-operational facilities.*











PATRON  
IDENTIFICATION  
VERIFICATION



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*Icon Key:*

-  Files & Filing Cabinets
-  Forms & Checklists
-  Video

-  Practical Application
-  TGS Portal

 TGS Cloud

## CHAPTER 1 – INTRODUCTION

### SECTION 1.1 – VERIFICATION EQUIPMENT

*All licensed facilities have a variety of equipment to assist in the verification process to determine the validity of presented identification. Retail Managers are responsible for ensuring all equipment is regularly inspected and in good working order. Team Members who encounter damaged or broken equipment should inform the Manager on duty for a timely remedy.*

#### SUBSECTION 1.1.A – I.D. CHECKING GUIDE®

*A current year I.D. Checking Guide® is provided to each location upon publication annually. It includes updates to all 50 states' driver's licenses and identification cards. It is a readily available reference, stored at the Check-In or reception area of all stores. Team Members should inform management if the guide is damaged or missing.*



#### SUBSECTION 1.1.B – IDENTIFICATION SCANNER

*All locations are equipped with an identification scanner, the Cardcom Viage CAV-3200 model, per AMED rule 401.2 Identification Scanners. All identification cards are swiped through the scanner, which reads licenses with 1D and 2D barcodes. It verifies and displays age and date of birth (DOB). The system detects altered, fraudulent or expired ID's. It has a 3 track magnetic stripe reader and IC card reader. The Cardcom Viage is portable and has a graphic LCD display. It reads and records ID number, name, address, a scanned age, and DOB with a date/time stamp of the transaction. The scanner eliminates the possibility of Team Members incidentally missing an expired identification or permitting an underage patron into the facility.*

*Additionally, if a Team Member suspects an underage person attempting to use a false or fake identification card, they will utilize their GSI 4-Way Fake ID Detector that detects the validity of a document using a UV Lamp, MG Magnet, and magnifier. Team Members should inform the Manager on duty as soon as possible if an attempted use of a fake identification occurs. When possible, the same standard equipment is made available for use at other locations outside of AMED jurisdiction.*

### SECTION 1.2 – THIRD-PARTY TRAINING COURSE

*All Team Members who regularly or occasionally verify identification of patrons undergo a Fake ID Training Course that is approved by the Hawaii Attorney General via Peace Officer Standards of Training. This course reviews a history of identification requirements, stringent methods for verification of the validity of the document, how to use verification equipment and briefly reviews Department requirements. This training manual is designed to accompany and support the training provided in the Fake ID Training Course.*



#### SUBSECTION 1.2.A – QUIZ THE PATRON

*If there is a question about the validity of a document, one of the best techniques for a Team Member to ensure the patron is who they present themselves to be is to quiz them about their vital statistics, such as middle name, address, or date of birth. Additional guidance on quizzing the patron is provided in the Fake ID Training Course and members of the management team may frequently use this technique to prevent underage access.*

## CHAPTER 2 – CUSTOMER SERVICE

*By remaining diligent and focusing training on timeliness and relevance, as well as avoiding complacency by checking all patrons on every visit, Team Members can adhere to best practices, ensure patrons receive a high-quality customer service experience and prevent underage access.*



## **SECTION 2.1 – TEAM MEMBER RESPONSIBILITY & ESCALATION**

*Ensure Team Members adhere to company policy and maintain compliant operations by fulfilling all requirements set forth in the Department rules governing sales. If there is a dispute as to the acceptance or validity of an identification document, the Team Member should use the 2-way radio to request the assistance of a Manager on duty. The Manager can further verify the document and permit or deny access to the facility. If the patron becomes disgruntled or the situation escalates to conflict, Team Members should rely upon the Conflict Resolution training they are provided and request the assistance of the Asset Protection team, if needed.*

### **SUBSECTION 2.1.A – VERTICAL IDENTIFICATION**

*A security feature implemented by many states to prevent underage access to a variety of age-restricted products, including alcohol, tobacco and marijuana is the issuance of vertical orientation ID cards or driver's licenses for persons under 21. It is company policy to prohibit access to a licensed facility to any patron presenting Hawaii vertical identification. Out-of-state forms of identification that are vertical, but still valid and display an age over 21 years old are acceptable.*



### **SUBSECTION 2.1.B – EXPIRED AND DAMAGED DOCUMENTS**

*It is a violation of company policy to accept expired or severely damaged documents. All forms of identification presented for marijuana sales must be legible and not expired, broken, ripped, torn or otherwise damaged. Medical Marijuana Registry Cards cannot be altered, torn, in pieces or laminated. Team Members may not accept invalid registry cards. Presently, there are two styles of registry cards in circulation, however as cards issued in 2014 expire they will be replaced by the updated, smaller version.*



### **SUBSECTION 2.1.C – UNDERAGE PREVENTION BEST PRACTICES**

*During the training Team Members receive, best practices for underage prevention are reviewed. These include looking for obvious signs the person is underage, such as high school sports attire or a letterman jacket. Remaining diligent and focused in efforts to prevent underage access makes our communities safer and ensures the transparency of the industry.*

## **SECTION 2.2 – RETAIL MANAGER RESPONSIBILITY**

*Retail Managers are responsible for ensuring Team Members adhere to all company policy and standard operating procedures by providing support in any instance of escalation. Once a Manager on duty receives notice via the radio that there is a dispute over identification, they should go to the Check-In area to address the concern with the Team Member and patron directly. The Manager is always responsible for making the final judgment or decision regarding facility access. When in doubt, err on the side of caution and deny access to any person who fails to provide adequate identification.*

## **CHAPTER 3 – CONCLUSION**

### **SECTION 3.1 – RETAIL MANAGER RESPONSIBILITY REVIEW**

*Retail Managers are capable of preventing underage access and compliance violations by ensuring Team Members rely upon the provided training to verify identification. The company depends upon all Team Members to maintain the safety and quality of customer service at each store. By receiving thorough training, having access to an assortment of verification equipment and management support, Team Members will be able to effectively provide safe access to patrons in a pleasant and welcoming atmosphere.*

### **SECTION 3.2 – SECURITY RESPONSIBILITY REVIEW**

*Security Team Members perform auditing duties, including review of transactions and records related to the age of patrons and underage access. They are responsible for communicating with Retail Managers any policy updates or Department*



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*regulation changes, to ensure that all sales remain compliant. They are available to answer questions and provide guidance on company policy and Department regulations at all times.*

**SECTION 3.3 – COMPANY RESPONSIBILITY**

*The company ensures Team Member success and an outstanding customer service experience by providing all necessary equipment and supplies for Team Members to verify identification of patrons. TGS Management is responsible for the infrastructure and overall management of facilities, including keeping equipment in good working order and providing Team Member training.*

*When Retail Managers and Team Members adhere to the verification policies set forth in this manual and rely upon provided training and tools, the company can ensure that all facilities perform compliant sales and patrons gain legal access to products.*

## Patient Education

CC Vet Service's partnership with existing medical marijuana industry experts, with the inclusion of a highly-qualified Medical Director, is the driving factor in creating a rich, robust patient education program that encompasses a multi-faceted approach in improving patient quality of life. Our Mission Statement encapsulates our intent, "The company exists to advance quality of life for guests and staff, and to reduce or alleviate suffering by improving the health, happiness, and security of our communities; we achieve this through changing the perception of marijuana via education, while providing safe, concierge-level, innovative access to high-quality, legal marijuana."

As the Medical Director, Dr. Laszlo Mechtler, M.D. will lead a group of doctors from the Dent Neurologic Institute who will act as the medical advisory committee. Dr. Mechtler is the Medical Director of the Dent Neurologic Institute, Chief of Neuro-Oncology at the Roswell Park Cancer Institute and specializes in the treatment of headache and brain tumors. As a board-certified Neurologist, the doctor proudly boasts certification in Headache Medicine and Neuroimaging from the United Council for Neurologic Subspecialties (UCNS). Additionally, he is a national speaker who provides education on a variety of medical topics, including the use of medical marijuana in the treatment of neurologic conditions and symptoms of debilitating conditions.

CC Vet Services understands that to effectively educate employees and patients about the medical use of marijuana, we must first have an understanding of the debilitating medical conditions it treats. By accessing legitimate university research on marijuana, cannabinoids and the endocannabinoid system published by the National Institutes of Health, a federal agency, we are able to review the subject matter currently being studied and reference conclusions drawn by scientists about efficacy under Dr. Mechtler's guidance. The NIH features over 13,000 published

studies with the keyword “Cannabis,” encompassing many of the conditions Hawaii recognizes such as, Post-Traumatic Stress Disorder, cachexia, nausea and seizures.

The medical benefits of marijuana are vast, but scientists have only been able to scratch the surface of what medical marijuana can achieve in relation to adverse health conditions. Every mammal on the planet harnesses an endocannabinoid system in their brain. The endocannabinoid receptors react with the cannabinoids in medical marijuana to create a variety of effects. It is important to note that all endocannabinoid systems and cannabinoid profiles in various strains can differ tremendously. For this reason, pairing qualifying patients with the medical marijuana or manufactured marijuana products that best suits their needs is vital to a satisfactory experience. To ensure patients receive quality advisement on their care, the medical advisory committee is available as a resource to registered dispensary employees and management to consult about particular patient needs by phone or email. Additionally, employees are training using the Quick Start Guide for each strain and product to provide meaningful information to patients about them.

An example of pairing medical marijuana strains or products with debilitating conditions, include the use of topicals or high-CBD strains to relieve the pain and inflammation of certain conditions. In contrast, another example would be for a patient with high blood pressure to avoid intensely uplifting strains to treat symptoms of other debilitating conditions, because those strains are high in THCV and will spike blood pressure, increase heart rate and may incite anxiety. For this reason, qualifying patients with high blood pressure are informed to abstain from such strains and opt for Indica-dominant medical marijuana, which will reduce blood pressure and have a calming effect.

Our company is proud to provide registered patients with customized recommendations, based on the analysis of our Medical Director, on a wide variety of products with differing

cannabinoid profiles. Every product is created to alleviate a certain medical ailment, and our registered dispensary employees are trained to provide educated recommendations to registered patients based on cannabinoid profiles and the associated effects.

We make cannabinoid profiles readily available to registered patients through a multiplicity of channels and interfaces that are easily accessible and highly informative. For example, we provide high resolution product displays, accurate web explanations and descriptive packaging as well as labeling that exceeds industry regulations. High resolution displays provide registered patients with real-time information to make clear decisions in the dispensary, while an interactive website and detailed labeling ensure registered patients have access to information on cannabinoid profiles at any given moment. Additionally, we provide registered patients with information on cannabinoid profiles through unmatched marijuana knowledge and professionalism offered to registered patients free of charge, every single day utilizing the expertise and knowledge of Dr. Mechtler and the medical advisory committee. Our employees are trained extensively in marijuana knowledge and every manufactured marijuana product in the dispensary before interfacing with registered patients, guaranteeing registered patients receive accurate information for any question.

Aside from thoroughly educating qualified patients, meeting the demanding manufacturing and dispensing needs for a burgeoning business is also essential to the continued growth and prosperity of our company. Analytics are regularly evaluated, providing us with valuable information to move the business down a definitive and successful path, month by month. Financial forecasts are determined six months in advance and contingencies are exercised through accounts that provide the ability to supply the production needs of the business to ensure an uninterrupted supply of products to qualifying patients and caregivers.



CC Vet Services also has a robust array of Standard Operating Procedures, forms, checklists and compliance requirements to ensure a steady, uninterrupted supply of marijuana and manufactured marijuana products to qualifying patients.

It is also the goal of the company to establish safe and accessible retail dispensing locations, which provide qualifying patients access to marijuana in a secure, non-threatening location. The use of perimeter checks on regular intervals helps ensure that the exterior of the dispensing facility and surrounding neighborhood are also safe, allowing for patients to access the facility and feel comfortable and at ease doing so. Our experience has shown that if a patient perceives that facility is unsafe, has a poorly maintained exterior, or the neighborhood is unsavory, they will not enter the facility. In order to combat these stereotypes or misperceptions, we ensure that security system features are visibly present to patients, that the facility is maintained properly to ensure all doors, locks, windows, and other infrastructure are in good repair, and that they protect the patients and products.

Our goal as a company is constant progression, especially when it comes to the qualifying patient experience. Analyzing the recommendations, complaints and concerns of qualifying patients helps to improve our products and provided services. Listening to our patients is the only way to guarantee a great product and service. It is also the best way to offer patient satisfaction. By comprehending the full qualifying patient experience, we can determine whether our company meets, exceeds or fails to meet expectations. Researching patient feedback helps us measure customer satisfaction and improve the medical marijuana and manufactured marijuana product experience. Showing our patients that we value their input helps promote brand loyalty and increase retention. CC Vet Services listens to patients and takes their feedback seriously, which has been a huge part of our continued success.

As an operator of retail dispensing locations, cultivation and manufacturing facilities, the company will establish a procedure to receive, organize, store and respond to all oral, written, electronic suggestions or complaints regarding the qualifying patient experience at a licensed dispensary. All suggestions and complaints will be documented and analyzed. Upon review, complaints will be directed appropriate channels to management and owners to effectively address and ensure patient satisfaction.

Our passion for relieving the ailments of qualified patients is unmatched by our competitors and it shows in our dedicated efforts to educate and serve patient needs. As a medical marijuana dispenser and manufacturer of marijuana products, offering products for sale in safe, accessible retail dispensing locations is our goal. Assisting qualifying patients in choosing the right medicine from the available options to best suit their medical needs is our primary purpose. In the event that needs are not met, it is our duty to guarantee open communication among registered dispensary employees and qualifying patients, thus ensuring suggestions, complaints or issues are addressed, resulting in improved patient satisfaction. In addition to providing qualifying patients with the best available product and ensuring their approval, we will also confirm that all inventory supply is adequately maintained through analyzing patient data as well as production needs. Paying close attention to each of these aspects of the business, provides our company with the capacity to meet the needs of qualifying patients now and for years to come.

## Background Checks

It is well known within the realm of business that embellish or hide certain aspects of their histories in order to appear more striking. That is why when it comes to selecting the best candidates to operate in Hawaii, delving deeper than just face value is very understandable. The state of Hawaii has the right to learn more about the candidates they are about to commit to a legal relationship with. The state also has the right to ensure that a potential partner does not have anything lurking in their past that could potentially result in adverse events. Our company understands that background checks can be a valuable tool for selecting the right candidate and eliminate the potential for future issues. For that reason, our company is devoted to ensuring compliance in regard to Hawaii regulations with respect to background checks.

In compliance with the requirements listed in §11-850-17 Background Checks, the company will ensure that all owners, principals or members, all dispensary employees, subcontractors and subcontractor employees, as well as authorized service providers undergo a background check in order to be listed for approved access to any dispensary facility. In addition, persons seeking permission to access a dispensary facility must complete a written consent form and provide unique, identifying information to the company to perform a background check. Furthermore, they must authorize the company to share the results with the Department and any third-party background check service provider for the sole purpose of compliance with §11-850-17. The company will retain written authorizations, digital records of unique identifying information and/or background check results in a secure manner through the use of locked files and/or by maintaining digital records on secure servers with restricted access to data for a period of no less than one and up to five years. All persons who undergo a background check and are authorized by the company to perform services at a dispensary facility or production center will

be reported to the Department to be added to the current, Department-approved list of providers, including those who perform construction, maintenance, repairs, or provide legal counsel or investors as required by 329D-16 and 329D-17.

All persons who are authorized by the company to perform services at a dispensary facility or production center must undergo a background check, be added to the current Department-approved list of providers and then must be logged on the Visitor's log which will include the first and the last name of the authorized person, date/time of entry and exit, purpose for entry, and the name of the dispensary agent escort as required by 329D-16 and 329D-17. Whenever practical, it is preferred for a manager to act as the escort, however any authorized employee of the dispensary facility may be an escort. Completed Visitor's Logs are considered part of business operation records and will be retained for a period of 6 years per §11-850-41.

Ensuring compliance with §11-850-17, the company will report any arrests and/or convictions of owners, principals or members, dispensary employees, subcontractors and subcontractor employees, as well as authorized service providers made known to the company by means of self-reporting or through regular checks annually to the Department electronically via email or by any means required by the regulatory environment.

Our company is actively ready to comply with all background check requirements in the state of Hawaii. It has always been our goal to keep the medical marijuana and manufactured marijuana product industry void of criminals and/or criminal activity. The background check process is an essential aspect of operations. It is a procedure that undoubtedly aids in identifying whether candidates are worthy of functioning as a dispensary facility. As background checks are obtained and analyzed, the state will see that our goal is a simple one: to provide concierge-level

service when providing safe and effective alternative medicine to qualifying patients in a comfortable atmosphere.

## Inventory Control Plan

CC Vet Services will ensure that all inventory of marijuana and manufactured marijuana products is electronically tracked through each stage of processing, from propagation to point-of-sale or disposal. We will accomplish this by electronically tracking and documenting all acquisitions through our proprietary point of sale inventory tracking system, in combination with inventory control policies and the state-designated seed-to-sale tracking system, BioTrack THC. CC Vet Services proprietary point-of-sale system can be fully integrated with the seed-to-sale tracking system and provide real-time, 24/7 inventory updates, including a web-based inventory platform that will be accessible to Hawaii regulatory agencies at all times. Our software enables us to efficiently track the chain of custody for all marijuana and manufactured marijuana products, as well as ensure that no qualifying patient or caregivers exceed the legal limit. Because our CC Vet Services has a dedicated team of IT professionals, if an outage occurs, the software can be instantly suspended and appropriately managed and troubleshot.

CC Vet Service's licensed dispensaries will ensure that all marijuana and manufactured marijuana products sent to our dispensaries are tracked in full compliance of Hawaii regulations.

Utilizing BioTrack THC and our proprietary point-of-sale inventory tracking software, the company will be capable of generating inventory manifests upon receipt of marijuana and manufactured marijuana products. CC Vet Service's dispensary training program includes detailed standard operating procedures that provide step-by-step instructions for proper utilization of the electronic manifest and inventory control system. Once the cultivation or processing stage of the supply chain is complete, our agents are trained to apply serial zip ties on every shipment and place the shipment in a high-impact structured, copolymer Pelican case, documenting compliance by conducting all steps in clear view of a surveillance camera. Marijuana and manufactured marijuana

products will be shown on camera when departing the company's production facilities and upon arrival to the dispensary location. This ensures adherence to the correct chain of custody and prevents potential product tampering or diversion. A shipment will only be signed for and accepted if all marijuana and manufactured marijuana products are accounted for. A digital log including manifest number, date and time, and serial number of delivery will be kept for all deliveries at CC Vet Services facilities for five years. Our marijuana and manufactured marijuana products can be logged into BioTrack THC and the POS system simultaneously in real-time, ensuring compliance and easy access for Hawaii regulatory agencies. CC Vet Services policy requires any discrepancies to be reported to and investigated by the company's security division.

To ensure that CC Vet Services is solely taking custody of a shipment containing marijuana and manufactured marijuana products, CC Vet Services extensively trains all agents on how to appropriately take custody of a shipment. Our agents are trained to receive all products in clear view of a surveillance camera to ensure compliance is visually recorded and appropriately documented.

All shipping manifests are maintained in our company's cloud storage that is encrypted and backed up at a separate location from the dispensary. We will maintain any manifests for five years, or any other time period stipulated by the State of Hawaii. These manifests will be accessible at any dispensary location. Our cloud system provides a sufficient amount of storage to ensure all manifests are maintained.

Once the manifest is checked, signed and received by the agent, we utilize our proprietary point-of-sale system and barcode scanning system to inventory products. Verified, discrepancy-free RFID tagged packages will be electronically received by the dispensary, thus electronically delivering the marijuana and manufactured marijuana products data to BioTrack THC. All

received, incoming inventory is entered or verified within the point-of-sale and seed-to-sale tracking system by the receiving agent.

Through the use of CC Vet Service's proprietary point-of-sale software, and with BioTrack THC, inventory control can be monitored and recorded compliantly and efficiently, which will offer accurate seed-to-sale tracking and real-time updates to Hawaii regulatory agencies. Lot and batch numbers are constantly tracked for every marijuana and manufactured marijuana product the company possesses. Every time our dispensary facilitates a sale and distributes marijuana and manufactured marijuana products to a qualifying patient or caregiver, the lot number, batch number and weight of the product is uploaded to our point-of-sale inventory tracking system, which is then relayed simultaneously to BioTrack THC. Our point-of-sale inventory tracking software also features a legal limit cap, where no marijuana and manufactured marijuana products are able to be sold past the legal limit. CC Vet Services is dedicated to providing Hawaii regulatory agencies with full transparency of products dispensed to qualifying patients or caregivers, and we will continually work to adapt dynamically to meet any new state laws or regulations proposed. The company will ensure that no marijuana and manufactured marijuana products will go untracked in our dispensaries, and accurate information related to seed-to-sale tracking will be available to Hawaii regulatory agencies 24/7.

CC Vet Services is diligent in maintaining accurate and detailed accounts of every product carried in the dispensary. CC Vet Services employs trained inventory professionals and merchandising specialists to make sure that our company adheres to as many industry-wide auditing and inventory best practices as possible, ensuring that at any given moment we have accurate product lists and specifications for every all marijuana and manufactured marijuana products we make available to qualifying patients or caregivers. Our merchandising and inventory



specialists also make sure that the products we provide our qualifying patients are of the highest quality available, because every marijuana and manufactured marijuana product in our dispensary will be offered with the patient in mind.

CC Vet Services proudly provides a vast set of resources for the theft and diversion of marijuana and manufactured marijuana products via a third party security division. Third party security experts are able to handle any instances of theft or diversion in a timely and effective manner. CC Vet Services policy requires security personnel at a dispensary to inform local law enforcement of any critical scenarios as soon as they occur. We encourage security personnel to develop positive relationships with local jurisdictions to ensure all incidents are handled professionally and appropriately. Any agent can also utilize our 24/7 tip line, which will provide an opportunity for anonymous reporting that goes directly to the third party security personnel. This is especially essential to reporting internal theft and diversion, empowering our agents to observe and report violations committed by any dispensary personnel. We encourage all company employees to be diligent in reporting policy violations, theft and diversion, and policy outlines strict prohibition of any retaliation against an employee who reports violations. These policies are included in the Report Writing & Violations Policies and Auditing Overview books in the appendices, as well as other security training documentation. Our goal is to provide employees with a safe, compliant environment, giving them the tools to address concerns in an effective and efficient way.

## Patient Care Plan

We are dedicated to maintaining patient care at all times, and we have the unique capability of leveraging custom software solutions for any aspect of the qualifying patient experience. CC Vet Services utilizes proprietary POS software and BioTrack THC seed-to-sale tracking system to monitor and track all medical marijuana from the time it is delivered to the time it is sold to a qualifying registered patient or caregiver. Employees are trained on health and safety topics and to properly identify patients and caregivers using the training manuals included as appendices.

Our proprietary POS system has offline interface capabilities that our software team can develop to ensure registered patients and caregivers can still be verified in the event of internet connectivity issues, when BioTrack THC remains operational. CC Vet Services ensures the security of private registered patient information by requiring unique usernames and passwords for every registered dispensing agent who accesses the system. Our security measures will meet or exceed any requirements set by the state. CC Vet Services is dedicated to efficiently and seamlessly serving registered patients while ensuring registrations status and that confidential information is only accessible to qualified and trained registered dispensing agents.

Our point of sale and seed-to-sale tracking systems also include automatic, HIPAA-compliant, offsite storage of all registered patient records, ensuring safety and security of sensitive information and advanced inventory control monitoring serviced by an Inventory Control Specialist (ICS) responsible for monitoring, ordering, and maintaining appropriate levels of medical marijuana product inventory at dispensing facility. Upon the depletion of a dispensing organization's medical marijuana inventory, the ICS will enter the appropriate amount of medical marijuana inventory into a virtual holding area in the point of sale. Upon transport of the actual, physical medical marijuana product to the dispensing facility, our licensed dispensing agent will

confirm accurate receipt of the product, eliminating any potential errors in inventory tracking and establishing an additional checks and balances feature. Our medical marijuana product barcodes function throughout the life of the plant, connecting all the way through the cultivation to final sales at the dispensary. Records reflect the chain of custody ensuring that we know where and when the plant is throughout the entire process.

Additionally, registered dispensary agents will take the time to inform qualifying patients of the potentially negative effects of marijuana on certain conditions or aspects of physiology in order to effectively treat a patient's medical conditions. CC Vet Services believes effective training and education of our dispensary agents will lead to patients receiving the best advice on how to treat their conditions. CC Vet Services prides itself on having the most extensive lineup of manufactured marijuana products available, ensuring that we provide our patients with as many high-quality options as possible. CC Vet Services is currently in possession of 37 unique clone-only marijuana strain and genetic varieties that vary in cannabinoid constituents. Of these, six have both 0.8 and less percent THC and above 11 percent CBD-A. Within the last year, the company's breeding program developed six high-CBD marijuana strains that meet the marijuana THC/CBD profile ratios similar to the well-known high-CBD strain Charlotte's Web, and we have the ability to cultivate and increase those numbers exponentially.

We make cannabinoid profiles readily available to patients through a multiplicity of channels and interfaces that are easily accessible and highly informative, such as high resolution product displays, accurate web explanations and descriptive packaging and labeling that adheres to and exceeds legal regulations. High-resolution displays provide patients with real-time information to make clear decisions in the dispensary, while an interactive website and detailed labeling ensure patients have access to information on cannabinoid profiles at any given moment.

Additionally, our CC Vet Services provides patients with information on cannabinoid profiles through unmatched marijuana knowledge and professionalism offered to patients free of charge. Our dispensing agents are trained extensively in marijuana knowledge and every manufactured marijuana product in the dispensary, guaranteeing patients receive accurate information for any question.

In addition to medical marijuana and medical marijuana product, CC Vet Services offers topicals. All of our manufactured marijuana products offer patients the ability to attain long-lasting relief from medical ailments without having to combust or vaporize. Manufactured marijuana topicals provide patients with yet another route of administration. Botanical topicals are absorbed and metabolized in the bloodstream through dermal application, and allow for patients to achieve relief from medical ailments such as arthritis, muscle spasms and multiple sclerosis, without having to smoke, vaporize or eat any marijuana products.

We provide guidance and access to security products to safely store marijuana products after purchase. It is a critical component of any patient education plan to ensure that patients are aware of how to keep their marijuana safe from unintended consumption by unauthorized persons, children or pets. Creating a professional, trusting, judgment-free environment enables our company to make patients feel at ease, asking questions and discussing their medical conditions freely. Years of experience has shown CC Vet Services that the more comfortable a patient feels and the more they trust the dispensing agent and company, the more likely they are to be honest about how we can help them. This enables us to make the most useful recommendations that ultimately provide the greatest relief.

## Testing Plan

CC Vet Services is devoted to providing qualifying patients, caregivers and the Department with full transparency in regard to potency and contamination. Ensuring the testing our company conducts is accurate, reliable and credible is paramount to operations and the information we so dearly wish to clearly provide. By focusing on full testing compliance, CC Vet Services aims to establish a trustworthy connection with qualifying patients and caregivers. Our effervescent and informative transparency offers peace of mind for all, and proof that qualifying patients and caregivers are receiving the highest quality marijuana and manufactured marijuana products possible. CC Vet Services will stringently adhere to any and all requirements for certified laboratory testing of marijuana and manufactured marijuana products posed by the State of Hawaii.

Once all marijuana and manufactured marijuana product has been verified by weight and entered into BioTrack THC, a sample will be removed for testing at the production facility. Upon completion of testing results, the production facility will package all products compliantly. The product will be logged out of the vault by time/date, weight and name. It is then acceptable to be transported to a dispensary facility. Upon arrival at a dispensary, an additional sample will be kept on hand for the Department.

CC Vet Services standard operating procedures state that a registered cultivation agent may not release any batch of marijuana if there was any deviation from the standard operating procedure during production. After independent testing of the batch, the cultivation agent may determine that the batch meets all specifications with the variety and accuracy of the day-to-day production, and allow it to be released for dispensing purposes.

CC Vet Services will use a state-certified testing laboratory to test marijuana and manufactured marijuana product. CC Vet Services ensures that rigorous scientific testing is essential to its operations.

CC Vet Services will interact with the laboratory to issue a certificate of analysis (COA), which ensures a product conforms to certain specifications. In addition to the concentrations of the species, a COA may include the following content, contaminant and consistency information: product identity, source, identification method (microscopic, HPLC, GC-FID, etc.), physical properties, cannabinoid profile, chemical assay and method (HPLC plus purity or specification ranges, etc.), microbiological data (total yeast and molds, STEC, salmonella), and impurities.

The Company will ensure the laboratory is responsible for the destruction of the remains of the marijuana sample after analysis is completed. Marijuana waste will be made unusable and unrecognizable in accordance with the disposal plan and standard operating procedures, which may or may not include grinding and incorporating the waste with non-consumable, solid wastes so that the resultant mixture is at least 50 percent non-marijuana waste. Solid waste can then be disposed of in a certified waste site and disposal facility.

Our Company will send marijuana samples to state-certified testing laboratories for testing to identify (1) cannabinoid potency; and (2) microbial contaminants. All testing will be compliant with Hawaii administrative rules 11-850-85. Samples will be taken from finished product, prior to batch sale. Samples will be homogenous and representative of the entire batch. Flower sampling will consist of an average of flowers taken from the top and bottom of the plant. All other products are to be sampled “as is.” All product labels that feature test results show MAX THC, THCA, and MAX CBD and CBDA or a 0% if no detectable quantity of that cannabinoid was found during testing. We will also perform testing for THCV, CBC, CBG, CBN and any additional testing

required by the Department. We are testing the potency of these cannabinoids in order to determine the potential efficacy in treating various illnesses. The test results will yield information pertaining to the specific cannabinoid concentration in each batch and will be used to provide a basis for informed decisions by medical professionals and qualifying patients and caregivers alike.

Upon review of the certificate of analysis, which determines whether or not the batch conforms to the variety of the specified compounds (THC, THCA, CBD, CBDA, CBG and CBN), all products are issued “Use By” dates that are one year from the manufacturing date, based on historical experience with marijuana manufacturing best practices. All manufactured marijuana products are issued “Use By” dates 60 days from the date of manufacture.

Additionally, all testing results will be available for qualifying patients or caregivers to view within a dispensary via an electronic “Strain Frame” display. Test results for all marijuana and manufactured marijuana products will also be available at all times on the Company website.

In conclusion, our Company is dedicated to providing qualifying patients and caregivers with the safest products possible. Through vigorous testing and attention to detail, our Company will provide qualifying patients and caregivers with laboratory-proven, high-quality product that they can count on to remedy any debilitating condition they may have.

### Signage, Packaging, Labeling and Chain of Custody

Our Company will meet and exceed current legal requirements regarding proper designation of restricted and limited access areas by educating our dispensary agents and providing adequate signage in our dispensaries. Dispensing agents are made aware of legal restrictions regarding entry into a dispensary and are equipped with tools to verify a qualifying patient's authorization. All restricted areas will be clearly identified using signage stating, "Limited Access Area-Access Restricted to Authorized Personnel Only." In an additional effort to promote signage compliance within the state of Hawaii, our company will abstain from any form of advertising or displays in any form of media.

Our Company works actively with our packaging vendors to guarantee that a constant supply of packaging is available to prevent production shortages, ensuring a steady, uninterrupted supply of medical marijuana and manufactured marijuana products. All medical marijuana and manufactured marijuana products will be packed daily for distribution and labeled with the statement "For medical use. Not for resale or transfer to another person." Packaging is also child resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act, opaque, thoroughly protected from contaminants and contains no more than ten milligrams tetrahydrocannabinol for one dose, serving or single wrapped item; provided that no manufactured marijuana product that is sold in a pack of multiple doses, servings, or single wrapped items, or any containers of oils, shall contain a total of more than one hundred milligrams of tetrahydrocannabinol per pack or container. To ensure compliance, employees will use the Packaging and Labeling Checklist included as an appendix.

Each package will only be labeled using black lettering on white background, void of any pictures or graphics while including the net weight/volume of the contents as well as its potency. It will also include the dispensary license number, the production center it originated from, the



batch number/package date, a unique tracking barcode, and a date of harvest or “Use by date”. In addition, packaging and labeling will have instructions for use and various health and safety warnings designed to effectively inform qualifying patients about the risks involved with medical marijuana and manufactured marijuana product consumption. All of this information will be visible on the label or an insert in the packaging. Medical marijuana or manufactured marijuana products will also not be labeled organic unless permitted by the United States Department of Agriculture.

In order to maintain the product seal after packaging and labeling, medical marijuana products have tamper-evident labels applied to ensure the product is protected in transit and until it is dispensed to the qualifying patient or caregiver. It is a company violation of regulations for anyone other than the qualifying patient or caregiver to “alter, obliterate or destroy any label attached to a medical marijuana container to administer the product.” This includes the tamper-evident label and ensures that product labels, weights, and quality assurance measures remain intact at the time of dispensing and fully-compliant with standard operating procedures and state laws and regulations proposed by the Department.

Labels will be required to carry the phone number of the dispensary, enabling a connection between qualifying patients or caregivers to the correct department in order to report any adverse product effects, complaints or suggestions. When applicable, product labels will include allergen warnings and nutrition facts as required by law. Our labels display all cannabinoids present in our medical marijuana or medical manufactured marijuana product, including the percentage of each cannabinoid present. We have the ability to print percentages of cannabidiol (CBD), cannabidiol acid (CBDA), cannabigerol (CBG), cannabinol (CBN), tetrahydrocannabinol (THC) and Tetrahydrocannabinolic Acid (THC-A). We will print the percentage of any cannabinoids present

in the product required by the Department. Our Company will ensure any cannabinoid with a percentage less than one percent will be reported with a leading zero before the decimal point. Our proprietary point-of-sales system can be calibrated to ensure these labeling requirements are stringently followed, per the request of the Department. Company policy mandates this information must be provided clearly and legibly for each registered patient or caregiver that makes a purchase.

To guarantee chain of custody throughout the plant life cycle and during the dispensing process, our company has developed and employed a proprietary seed to sale inventory tracking system. Medical marijuana and manufactured marijuana products cannot advance through the stages of production without being accurately represented within the custom inventory tracking software. In addition to our proprietary point of sale and the seed-to-sale tracking system, we have developed an extensive lineup of training manuals to properly teach and train every agent how to perform their specific job duties correctly and compliantly. Our Dispensary Training Program includes detailed standard operating procedures that provide step-by-step instructions for proper utilization the electronic manifest and inventory control system. Our agents are trained to document their compliance by conducting all production or sales steps in clear view of a surveillance camera. Manufactured marijuana products and medical marijuana will be shown on camera when departing cultivation as well as when arriving to the licensed dispensary location. This ensures that the product has video proof of chain of custody and has not been tampered with. A digital log including manifest number, date and time, and serial number of delivery will be kept of all deliveries and held at licensed facilities for 5 years. A shipment will only be accepted if all medical marijuana is accounted for. Any discrepancies are reported in our Company portal and investigated by the security manager.



**§11 – 850 – 92 - Packaging and Labeling for Retail Sale**

Verified ✓	Department Requirement	How the Requirement is Met	Department Regulation # (Legal Citation)
	Medical Marijuana must be in a package that is child-resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act	Packaging is child-resistant	§11 – 850 – 92 (a.1)
	Packaging is opaque so that the product cannot be seen from outside the packaging	Opaque Container	§11 – 850 – 92 (a.2)
	Packaging must protect the product from contamination and does not impart any toxic or harmful substance to the marijuana or manufactured marijuana product	Worker Protection Standards, sanitation efforts	§11 – 850 – 92 (a.3)
	Contains no more than ten milligrams tetrahydrocannabinol for one dose, serving, or single wrapped item	Potency Profile Label	§11 – 850 – 92 (a.4)
	Package is labeled using only black lettering on a white background with no pictures or graphics	Container Label	§11 – 850 – 92 (b.1.A)
	Label includes the net weight/volume and potency	Container Label	§11 – 850 – 92 (b.1.B)
	The dispensary licensee's license number and name of production center where contents were produced	POS Label	§11 – 850 – 92 (b.2)
	The batch number and date of packaging	Container Label	§11 – 850 – 92 (b.3)
	A computer tracking inventory identification number barcode generated by tracking software	Container Label	§11 – 850 – 92 (b.4)
	Date of harvest or manufacture and "Use by date"	Container Label	§11 – 850 – 92 (b.5)
	Instructions for use	Container Label	§11 – 850 – 92 (b.6)
	The phrases "For medical use only" and "Not for resale or transfer to another person"	Warning Label	§11 – 850 – 92 (b.7)
	The warning, "This product may be unlawful outside of the State of Hawaii and is unlawful to possess or use under federal law"	Warning Label	§11 – 850 – 92 (b.8.A)
	The warning, "This product has intoxicating effects and may be habit forming"	Warning Label	§11 – 850 – 92 (b.8.B)
	The warning, "Smoking is hazardous to your health"	Warning Label	§11 – 850 – 92 (b.8.C)
	The warning, "There may be health risks associated with consumption of this product"	Warning Label	§11 – 850 – 92 (b.8.D)
	The warning, "This product is not recommended for use by women who are pregnant or breast feeding"	Warning Label	§11 – 850 – 92 (b.8.E)
	The warning, "Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug"	Warning Label	§11 – 850 – 92 (b.8.F)
	The warning, "When eaten or swallowed, the effects of this drug may be delayed by two or more hours"	Warning Label	§11 – 850 – 92 (b.8.G)
	A disclosure of the type of extraction method, including any solvents, gases, or other chemicals or compounds used to produce the manufactured marijuana product	Disclosure Label	§11 – 850 – 92 (b.9)
	The name of the laboratory that performed the testing	Testing Label	§11 – 850 – 92 (b.10)
	That the product is not labeled organic unless permitted by the United States Department of Agriculture in accordance with the Organic Foods Production Act	Testing Label	§11 – 850 – 92 (c)

**End of § 11 – 850 – 92**

**Please Note: All wording in quotes and highlighted in yellow must be quoted EXACTLY, per Department of Health regulations.**

**FINAL Quality Control Check of MEDICAL Marijuana/Manufactured Marijuana Products:**



§11 – 850 – 92 - Packaging and Labeling for Retail Sale

Verified ✓	Department Requirement	How the Requirement is Met	Department Regulation # (Legal Citation)
	Medical Marijuana must be in a package that is child-resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act	Packaging is child-resistant	§11 – 850 – 92 (1)
	Packaging is opaque so that the product cannot be seen from outside the packaging	Opaque Container	§11 – 850 – 92 (2)
	Packaging must protect the product from contamination and does not impart any toxic or harmful substance to the marijuana or manufactured marijuana product	Worker Protection Standards, sanitation efforts	§11 – 850 – 92 (3)
	Contains no more than ten milligrams tetrahydrocannabinol for one dose, serving, or single wrapped item	Potency Profile Label	§11 – 850 – 92 (4)
	Package is labeled using only black lettering on a white background with no pictures or graphics and includes the net weight/volume and potency	Container Label	§11 – 850 – 92 (4.b.1.A&B)
	The dispensary licensee's license number and name of production center where contents were produced	POS Label	§11 – 850 – 92 (4.b.2)
	The batch number and date of packaging	Container Label	§11 – 850 – 92 (4.b.3)
	A computer tracking inventory identification number barcode generated by tracking software	Container Label	§11 – 850 – 92 (4.b.4)
	Date of harvest or manufacture and "Use by date"	Container Label	§11 – 850 – 92 (4.b.5)
	Instructions for use	Container Label	§11 – 850 – 92 (4.b.6)
	The phrases "For medical use only" and "Not for resale or transfer to another person"	Warning Label	§11 – 850 – 92 (4.b.7)
	The warning, "This product may be unlawful outside of the State of Hawaii and is unlawful to possess or use under federal law"	Warning Label	§11 – 850 – 92 (4.b.8.A)
	The warning, "This product has intoxicating effects and may be habit forming"	Warning Label	§11 – 850 – 92 (4.b.8.B)
	The warning, "Smoking is hazardous to your health"	Warning Label	§11 – 850 – 92 (4.b.8.C)
	The warning, "There may be health risks associated with consumption of this product"	Warning Label	§11 – 850 – 92 (4.b.8.D)
	The warning, "This product is not recommended for use by women who are pregnant or breast feeding"	Warning Label	§11 – 850 – 92 (4.b.8.E)
	The warning, "Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug" and "When eaten or swallowed, the effects of this drug may be delayed by two or more hours"	Warning Label	§11 – 850 – 92 (4.b.8.F&G)
	A disclosure of the type of extraction method, including any solvents, gases, or other chemicals or compounds used to produce the manufactured marijuana product	Disclosure Label	§11 – 850 – 92 (4.b.9)
	The name of the laboratory that performed the testing	Testing Label	§11 – 850 – 92 (4.b.10)
	That the product is not labeled organic unless permitted by the United States Department of Agriculture in accordance with the Organic Foods Production Act.	Testing/Testing Label	§11 – 850 – 92 (4.c)
<b>End of § 11 – 850 – 92</b>			

**FINAL Quality Control Check of MEDICAL Marijuana/Manufactured Marijuana Products:**

(Manager or Lead uses Checklist to verify all quality control points)

Date:



§11 – 850 – 92 - Packaging and Labeling for Retail Sale

Verified ✓	Department Requirement	How the Requirement is Met	Department Regulation # (Legal Citation)
	Medical Marijuana must be in a package that is child-resistant in accordance with Title 16 C.F.R. 1700 of the Poison Prevention Packaging Act	Packaging is child-resistant	§11 – 850 – 92 (1)
	Packaging is opaque so that the product cannot be seen from outside the packaging	Opaque Container	§11 – 850 – 92 (2)
	Packaging must protect the product from contamination and does not impart any toxic or harmful substance to the marijuana or manufactured marijuana product	Worker Protection Standards, sanitation efforts	§11 – 850 – 92 (3)
	Contains no more than ten milligrams tetrahydrocannabinol for one dose, serving, or single wrapped item	Potency Profile Label	§11 – 850 – 92 (4)
	Package is labeled using only black lettering on a white background with no pictures or graphics and includes the net weight/volume and potency	Container Label	§11 – 850 – 92 (4.b.1.A&B)
	The dispensary licensee's license number and name of production center where contents were produced	POS Label	§11 – 850 – 92 (4.b.2)
	The batch number and date of packaging	Container Label	§11 – 850 – 92 (4.b.3)
	A computer tracking inventory identification number barcode generated by tracking software	Container Label	§11 – 850 – 92 (4.b.4)
	Date of harvest or manufacture and "Use by date"	Container Label	§11 – 850 – 92 (4.b.5)
	Instructions for use	Container Label	§11 – 850 – 92 (4.b.6)
	The phrases "For medical use only" and "Not for resale or transfer to another person".	Warning Label	§11 – 850 – 92 (4.b.7)
	The warning, "This product may be unlawful outside of the State of Hawaii and is unlawful to possess or use under federal law"	Warning Label	§11 – 850 – 92 (4.b.8.A)
	The warning, "This product has intoxicating effects and may be habit forming"	Warning Label	§11 – 850 – 92 (4.b.8.B)
	The warning, "Smoking is hazardous to your health"	Warning Label	§11 – 850 – 92 (4.b.8.C)
	The warning, "There may be health risks associated with consumption of this product"	Warning Label	§11 – 850 – 92 (4.b.8.D)
	The warning, "This product is not recommended for use by women who are pregnant or breast feeding"	Warning Label	§11 – 850 – 92 (4.b.8.E)
	The warning, "Marijuana can impair concentration, coordination, and judgment. Do not operate a vehicle or machinery under the influence of this drug" and "When eaten or swallowed, the effects of this drug may be delayed by two or more hours"	Warning Label	§11 – 850 – 92 (4.b.8.F&G)
	A disclosure of the type of extraction method, including any solvents, gases, or other chemicals or compounds used to produce the manufactured marijuana product	Disclosure Label	§11 – 850 – 92 (4.b.9)
	The name of the laboratory that performed the testing	Testing Label	§11 – 850 – 92 (4.b.10)
	That the product is not labeled organic unless permitted by the United States Department of Agriculture in accordance with the Organic Foods Production Act.	Testing/Testing Label	§11 – 850 – 92 (4.c)
<b>End of § 11 – 850 – 92</b>			



<b>FINAL Quality Control Check of MEDICAL Marijuana/Manufactured Marijuana Products:</b> (Manager or Lead uses Checklist to verify all quality control points)	
Date:	
Location/Facility:	
Batch # Verified:	
Product Name:	

Signature:	
Manager Printed Name:	Badge #:

File all completed Checklists in the Manager's office for future reference or auditing.

## Disposal or Destruction

With five years of experience in the marijuana industry, the Company has developed marijuana and manufactured marijuana products disposal policies that meet or exceed Hawaii's regulatory and compliance standards. The following plan will outline all policies and procedures that the Company has developed for our dispensary facilities through working with various regulatory agencies regarding the disposal of marijuana and manufactured marijuana product waste.

All Company facilities will maintain an exemplary level of cleanliness and organization. Additionally, all areas of the facility will be kept free of any debris. The facility manager or assistant manager will be responsible for maintaining the minimum number of agents required to sustain an efficient workflow and meet the needs of qualifying patients at any given time. The facility manager or assistant manager will be responsible for keeping and maintaining all business records at the facility, and will be able to provide records upon request by law enforcement or regulatory agencies. While we take pride in the many ways we strive to reduce waste, we are also proud of the strategies we use in proper waste management and disposal.

All marijuana waste generated in our dispensaries will be disposed of compliantly by stringently adhering to the regulations set forth by the Department of Health regarding marijuana and manufactured marijuana product waste disposal in the State of Hawaii. Marijuana and manufactured marijuana product waste is defined as unused, unsold, contaminated, or expired marijuana or marijuana manufactured products, and our Company strictly abides by these stipulations. Company policy requires all dispensaries to store all marijuana and manufactured marijuana product waste in designated labeled waste bins, which are kept within the vault located in the secure room for full compliance and surveillance. The dispensary vault is divided into

multiple areas, including a quarantine hold area. The quarantine hold area will serve as central holding location for all marijuana and manufactured marijuana product waste that is collected at a specific dispensary facility. All marijuana and manufactured marijuana product waste will be sorted, weighed, logged and entered into the Company's Waste Disposal Log. Dispensary managers will be responsible for ensuring that all marijuana and manufactured marijuana product waste is accurately logged and entered into the Company's proprietary point-of-sale software and BioTrack THC. If dispensary waste is transferred to a production facility, the Company will use BioTrack THC to produce a manifest that will detail the weight, batch and lot number of all the marijuana and manufactured marijuana product waste that is disposed of.

The Company holds marijuana and manufactured marijuana product waste for seven days, and waste disposal only occurs once a week, decreasing the likelihood of waste theft and unintended diversion of marijuana and manufactured marijuana products.

After marijuana and manufactured marijuana product waste has been quarantined for seven days, the dispensary manager will supervise the rendering of any marijuana and manufactured marijuana product waste into an unusable state, employing methods approved by the State of Hawaii. This process results in waste that is 50 percent non-marijuana waste by volume. Rendering marijuana and manufactured marijuana product waste unusable requires combining it with other forms of waste, including livestock feeds, food waste, yard waste, vegetable-based grease, biodegradable products, and plant matter.

Once the waste has been rendered unusable, the dispensary manager will ensure the non-consumable marijuana and manufactured marijuana product waste is locked in a secured waste enclosure that will not be accessible by the general public. All disposal of unusable marijuana and manufactured marijuana product waste must be performed in front of the Company's surveillance



system to verify disposal is compliant with policy and regulatory standards. Agents will only have access to waste when accompanied by a manager at the time of disposal. Once the unusable marijuana and manufactured marijuana products waste has been disposed of, the manager will contact a designated local waste management company for pick-up. All marijuana and manufactured marijuana product waste will be transported to a landfill or any other waste dispensing location designated by the State of Hawaii.

In our standard production practices, nearly all parts of the marijuana plant are utilized upon harvest. As part of our commitment to compliance, we have procedures in place that ensure all marijuana and manufactured marijuana waste is collected and disposed of properly per regulations. In all crop production areas, we have marijuana waste receptacles placed in plain view of security cameras. Waste put into these receptacles is then taken to the main waste disposal area, where it is weighed in view of security cameras and recorded under the corresponding batch, tag and license numbers. The waste is then put into a large locked receptacle where it remains until it can be ground and blended with compostable material. Compost material can be acquired from in-house paper waste, or collected from neighborhood sources, aiding in local waste resource management. Once blended, we plan to deposit the material into an onsite compost mound. A tall fence topped with razor wire and located within the facility parameter will secure compost mounds. There will be an industrial grinder located at the access point that will be used to grind plant material along with any other compostable waste. In addition to providing an onsite means to dispose of marijuana waste, the compost pile will also act as a sink for all biodegradable production waste, resulting in significantly less material going to the landfill.

Production waste that is not compostable will be recycled. Items that fall into this category will be stored in a locked dumpster and picked up weekly by a waste management services

provider. Due to our practice of sanitizing and reusing hydroton, very little grow media waste is produced. The small amounts of media waste that is produced will be properly disposed of according to regulations. All pesticide containers will be triple rinsed, with rinse-waste disposed of per regulations and taken to a container collection site. All broken bulbs or other electronics waste will be disposed of properly through local landfills or contractor services. All other facility waste will be compacted prior to pick up with an onsite trash compactor. We utilize these units at our facilities and are able to reduce trash prior to pick up. The final waste component, which is nutrient-enriched wastewater, will be directed to an onsite remediation pond. This pond will be stocked with phytoremediation of plants such as cattails, duckweed, and water fern which absorb aqueous nutrients and stop them from entering the water supply. These plants will be periodically harvested into the compost pile. All of these practices acting in concert will greatly reduce our impact on the local environment and strengthen our commitment to sustainability by releasing nutrients at agronomic rates.

Operating and control of waste disposal leads to innovative procedures resulting in less waste and a more sustainable dispensary facility. Our Company's operating strategy behind waste disposal is to create less waste, while also strictly adhering to Hawaii policies and procedures for the disposal of marijuana and manufactured marijuana product waste, which is defined as unused, unsold, contaminated, or expired marijuana or marijuana manufactured products. Through our experience and expertise, we will build a strong foundation in all of our dispensary and production facilities and streamlined processes to ensure the adequate disposal of marijuana and manufactured marijuana product waste.

## Product Safety Plan

Our Company is a patient-centered marijuana-based health care organization. Our purpose is to provide high quality, safe and natural relief to qualifying patients in Hawaii in search of alternative medicines. It is our mission to provide that relief through dispensing the safest and most effective medical marijuana and manufactured marijuana products. This will be achieved through adhering to the Worker Protection Standard, formulating effective health and safety training, designed to reduce the introduction of microbial contaminants to medical marijuana and manufactured marijuana product, and performing necessary contaminant/potency testing. Training manuals and cultivation and manufacturing SOPs are included in the appendices for more information on quality assurance training and product safety initiatives.

During the initial production efforts and throughout the life cycle or manufacturing cycle, each facility will maintain an exemplary level of cleanliness and organization. All production areas will be designated to certain departments (production, processing, distribution), reducing the potential for cross-contamination between production zones. All agents are also required to adhere to company best practices in regard to sanitation, which requires entire work stations, production areas and equipment to be thoroughly sanitized with 91 percent isopropyl alcohol. Isopropyl alcohol is an effective sterilizer and significantly decreases the likelihood of cross-contamination, viruses and disease. Appropriate sanitation methods preserve operational compliance and encourage adherence to the Worker Protection Standard (WPS), which prohibits the excessive use of additives, chemicals and pesticides that could affect product safety.

The Worker Protection Standard or WPS is a regulation of the United States Environmental Protection Agency (EPA) designed to safeguard pesticide Workers and Handlers from the effects of exposure to agricultural pesticides. In place since 1992, the EPA updates the standard whenever

necessary to improve protections for employees. All WPS requirements are outlined in the Pesticide Safety manual and other relevant OSHA topics are covered in the Respiratory Protection Program manual and Compressed Gas Training Program to ensure all operations are compliant with federal regulations and Department rules.

Compliance with the WPS is serious, and the success of the business is dependent upon all agents receiving proper training, as outlined below. WPS training for workers includes the following information:

- Where and in what form pesticides may be encountered during work activities
- Hazards of pesticides resulting from toxicity and exposure, including acute effects, chronic effects, delayed effects, and sensitization
- Routes through which pesticides can enter the body
- Signs and symptoms of common types of pesticide poisoning
- Emergency first aid for pesticide injuries or poisonings
- How to obtain emergency medical care
- Routine and emergency decontamination procedures, including emergency eye flushing techniques
- Hazards from chemigation and drift
- Hazards from pesticide residues on clothing
- Warnings about taking pesticides or pesticide containers home
- An explanation of the WPS requirements designed to protect workers, including application and entry restrictions, design of the warning sign, posting of warning signs, oral warnings, availability of specific information about applications, and protection against retaliatory acts.

Worker Protection Compliance helps guarantee that residual chemicals never make their way into inappropriate channels and cross-contaminate medical marijuana and manufactured marijuana products. Our company has developed a rigorous validation process for marijuana and manufactured marijuana products to establish the safety of the production process. The validation process ensures best practices for operating procedures, manufacturing practices and training plans before producing medical marijuana and manufactured marijuana products. This process will require that any person involved with producing medical marijuana and manufactured marijuana products must be appropriately trained in accordance with their job description to safely operate and maintain the system used for cultivation as well as manufacturing. Agents will provide accurate reporting of finished product counts, waste, inventory levels and other pertinent information related to cultivation or manufacturing. In order to ensure the highest quality products, all managers follow specific instructions to record data on forms, checklists or labels and in any other format. Accurate recordkeeping is vital to consistent operations and guaranteeing product safety, quality and potency. WPS integrates seamlessly with current company training modules, creating supportive health and safety training that is designed to prevent adverse events that could lead to cross-contamination and ultimately, unsafe marijuana or marijuana products.

The recent legalization and fluctuating legal environment means there is little known about the sources, growing and curing conditions, or pesticide use for medicine available for purchase. While growers employed by our company take care to provide a safe, effective product, there are numerous reports of the presence of pesticides and molds in purchased medicine. The current legal landscape subject's patients to the ethics and whims of people they largely do not know and may never be able to contact. The only solution at present to ensure the safety and efficacy of medical marijuana is through reliable testing. It can be argued that testing by laboratories owned or closely

affiliated with specific growers or dispensaries might not have the interest of the patients as their top priority. For this reason, independently owned and operated laboratories are the best solution.

Testing is a necessary step, and allows us to take pride in our products by being scientifically positive that they are high-quality and free of contaminants. This, of course, is due to the quality control mechanisms executed and adhered to by our trained agents. Without systems in place to control the countless variables that come with changes in the raw product and the packaging, it is almost impossible to provide these products over and over again to qualified patients with consistent potency and purity. Testing at a certified state laboratory helps identify specific cannabinoid percentages in the product, and also determines whether or not harmful microbial bacteria is present. Consumption of microbiological contaminants is harmful, and potentially deadly for patients with compromised immune systems. Qualifying patient health and safety is paramount for our company, which is why it is a company best practice to identify the potency of marijuana and manufactured marijuana products.

Potency may not seem like a safety issue, however potency and cannabinoid testing provides patients with important information to aid in selecting the product that best suits their needs. If a qualifying patient is unaware of the potency of a flower or manufactured marijuana product, the resulting experience could be incredibly uncomfortable, which would defeat the medicinal purpose. Every qualifying patient harbors a different endocannabinoid system in their body, which means that everyone's reaction will be unique. For this reason, potency and cannabinoid profile testing is extremely helpful when determining which product is best suited for a particular qualifying patient's needs.

Cannabinoids are compounds found in varying amounts in different strains of marijuana that can have differing medicinal benefits. Tetrahydrocannabinol (THC), cannabidiol (CBD),

cannabinol (CBN), THC acid (THCA), cannabidiolic acid (CBDA), tetrahydrocannabivarin (THCV), and cannabigerol (CBG) are just a few of the many cannabinoids. Studies have found that differing levels of these compounds will determine how effective a particular marijuana strain is for treating a patient's specific symptoms. However, many dispensaries are marketing untested marijuana extracts and tinctures which were recommended by doctors for many different complaints including pain, cough and asthma, and as a sedative agent, which in some cases may result in erratic and unpredictable individual responses. This is exactly the kind of adverse event our company is trying to eradicate through laboratory testing. By knowing not only that the product is safe, but also the cannabinoid profiles, agents and patients will be able to make informed decisions together and guarantee that the marijuana and manufactured marijuana product is effective, safe and provides a representative experience for the qualifying patient.

To further guarantee product and qualifying patient safety, our company provides labeling and packaging that is child-resistant and opaque, so that the medical marijuana or manufactured marijuana product cannot be viewed while it is inside the package. In addition, labeling uses only black lettering on a white background void of pictures or graphics, is clearly labeled "For Medical Use Only" and "Not for resale or transfer to another person". The label also includes a "Use by date", potency information, a tracking barcode, the weight of the contents, the production center the contents came from, the batch number and the date that the contents were packaged. Strict compliance with Medical Marijuana Dispensary System, specifically 329-D11 in regard to advertising and packaging, ensures that qualifying patients do not experience undesired consequences resulting from the purchase and storage of medical marijuana or manufactured marijuana products.

No License Revocation

As an experienced business owner, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] helps guarantee a high level of professionalism, experience and knowledge in the industry. Our medical marijuana experience comes from the culmination of medical marijuana dispensary and operations experience. Pioneers in the medical marijuana industry, our Company is improving and perfecting every process and procedure of medical marijuana production. This expertise will undoubtedly benefit the qualifying patients of Hawaii in a variety of ways. With the singular focus of ensuring the safety of qualifying patients and the community, this company was built on core values and principles that ensure the production of high-quality, consistent products in compliant, safe, and secure facilities, which has allowed us to successfully operate without license revocation.

Adherence to high moral and ethical standards coupled with relentless hard work and smart decisions has propelled the Company to unprecedented growth. From our humble beginnings in 2009, the Company grew from one dispensary and one cultivation facility to three cultivation facilities, a technology-driven manufacturing facility, and 13 dispensaries and upwards of 500 employees in 2015. It is no secret, our success is due to hard work, adaptability and a relentless dedication to compliance. To ensure consistency of products, service and compliance, all available resources were reinvested to build proprietary software systems, employee portals and a carefully orchestrated chain-of-command, effectively guaranteeing that all procedures are completed without any chance of risking the license to operate.



Although our Company leads the vertically integrated medical marijuana business, our business, first and foremost, is compliance. To that end, creating up-to-date Standard Operating Procedures (SOPs) that are always accessible via our agent portal and through LMS training will ensure that each and every member of our team is well versed in all policy and procedures. Due to our dedication to compliance and safety, our company has also helped shape regulations in other states. We will continue this focus and look forward to assisting the Department whenever necessary.

Additionally, our Company has the capability to leverage custom software solutions for any aspect of operations to prevent any opportunities for error that could lead to license revocation. Our devoted IT department has created a proprietary point of sale system as well as a seed-to-sale tracking system to efficiently and accurately maintain and archive all aspects of electronic manifesting and inventory control.

In the event of an adverse event resulting in a compliance violation, we pride ourselves on the ability to perform internal investigations that are both accurate and efficient. We have a dedicated security team equipped with a special investigations unit to perform all investigatory functioning and auditing within the Company. In the instance that a discrepancy is observed in a shipment, our special investigations unit will quickly and efficiently perform an audit that provides a preliminary report that outlines the discrepancy and the investigation conducted as a result of the event. These issues are addressed within 24 hours of an incident. Our Company's policy requires investigating agents and any other personnel involved to report an occurrence to regulatory and law enforcement agencies as soon as possible, including the Department. The preliminary discrepancy report will be submitted by our special investigations unit to the Department within 7 days of the discrepancy being observed. Our company is constantly trying to provide full

transparency of operations to state regulatory agencies, and any anomalies will be reported in a timely manner. We abide by a zero-tolerance policy when it comes to discrepancies, and every single discrepancy or anomaly is reported by our special investigations unit, with no exceptions. Maintaining constant compliance at all times is a primary goal of our Company, and our security team is trained extensively in compliance through our robust array of training programs.

Through establishing effective means of production and strategically understanding the medical marijuana compliance regulations while ensuring adherence during all phases of operation, our company has been able to successfully operate without chance of license revocation. Our dedication has allowed us to set industry standards for quality and consistency. Qualifying patients and regulatory agencies attest to our outstanding product quality and knowledge, which is why we have been chosen as the model for a successful, compliant medical marijuana business to a variety of government officials. We have hosted our State Governor and members of his cabinet and all high ranking officials from the State Regulatory Agencies at our facilities. These visits in 2013-2014 were humbling and proved that our Company is at the forefront of medical marijuana innovation and compliancy. We are proud to have created a manufacturing process that is safe, respected, streamlined and professional.