

GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#), True North of Utah, LLC (company name) asserts a claim of business confidentiality to protect the following information submitted as part of a Request for Proposals.

- non-public financial statements
- specific employee name and contact information
- specific customer information, client lists, or subscription lists
- other (specify):

Trade secrets, confidential information, and security protocols concerning True North's business, including, without limitation, policies and procedures, cultivation/harvesting methodology, compliance records, business plans, proprietary business information, personal information, and other confidential business records.

This claim is asserted because this information requires protection as it includes:

trade secrets as defined in Utah Code Section [13-24-2](#) ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and] (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

Following is a concise statement of reasons supporting the claim of business confidentiality:

The information marked for redaction in the attached "Exhibit A" is submitted in connection with the Utah Department of Food and Agriculture's ("UDAF") request for information related to True North's 2024 Medical Cannabis Cultivation License Renewal Application (the "Application"). The redacted information qualifies for GRAMA protection for the following reasons:

- 1) The Application contains highly-sensitive trade secrets and confidential information related to True North's business, including proprietary cultivation methodology, production/harvest information, compliance records, business plans, security protocol, and other confidential business records.
- 2) The redacted information in the Application derives independent economic value, is not readily available to the public, and is subject to True North's continuing efforts to maintain its secrecy (including as required under UDAF regulations).
- 3) UDAF (and the State) has a strong public policy interest in maintaining the confidentiality of these records, which are required to maintain the competitive nature of Utah's Medical Cannabis Program while protecting against competitive injury, ensure the safety of operations, and to prevent the unlawful diversion of medical cannabis.
- 4) The disclosure of the redacted information would discourage license holders from providing such information to UDAF in the future out of concerns for competitive harm, the safety of staff, and other issues related to the misuse of such information. True North will supplement any additional information related to its GRAMA request as the State may require.

Signed: _____

On behalf of (company): True North of Utah, LLC

Date: 11/29/2023



Greta Brandt
President

November 7, 2023

Sent Via Email Only (cannabis@utah.gov)

Attn: Mr. Cody James
Manager, Industrial Hemp and Medical Cannabis Program
Utah Department of Agriculture and Food
4315 S 2700 West
TOSB South Bldg., Floor 2
Taylorsville, Utah 84129

Re: 2024 Cultivation License Renewal Application
True North of Utah LLC d/b/a True North Organics

Dear Mr. James:

True North of Utah LLC d/b/a True North Organics, License No. 7001-20178 ("True North"), submits the following Cultivation License Renewal Application in compliance with all department requirements and guidelines, including page limits (excluding cover sheet, checklist, index, and exhibit sheets). We will also submit the required \$100,000 annual licensing fee by December 31, 2023, in compliance with R68-21-15(2).

Please see below for an index of True North's renewal application:

- **Renewal Application Checklist** (Responses 1–11);
- **Renewal Narratives** (Responses 12–35).

Please let me know if the department has any questions or require any additional information, and we are happy to supplement the same.

Thank you for your time and consideration of True North's renewal application.

Respectfully,

A handwritten signature in blue ink that reads "Greta Brandt".

Greta Brandt, Esq.

| | | |
|--|--|---|
| Utah Department of Agriculture & Food 4315 South 2700 West TSOB South Bldg, Floor 2 Taylorsville, UT 84129-2128 | MEDICAL CANNABIS CULTIVATION 2024 RENEWAL APPLICATION CHECKLIST | Website: www.ag.utah.gov Phone: 801-982-2200 Email: cannabis@utah.gov |
|--|--|---|

The 2023 renewal document must be submitted to the Utah Department of Agriculture and Food by 7 November 2023. The document submitted to the Department will be considered the notice of intent to renew specified in R68-27-15. A UDAF Establishment Approval Board Meeting will be held in mid-December to officially approve or request changes to the business plans submitted.

To renew a cultivation license, an approved Medical Cannabis Cultivation Facility must submit the \$100,000 annual licensing fee by 31 December 2023.

If the licensing fee and intent to renew are not submitted by 31 December 2023 the licensee shall not continue to operate.

The Renewal Application submitted by a Cannabis Cultivation Facility and approved by the Establishment Board will be considered the business's operating plan starting January 1, 2023. UDAF Inspectors will use the approved operating plan for regulatory purposes. Ensure all information is complete, current, and accurate.

The information provided by the applicant for a Medical Cannabis Cultivation Establishment must fit within the following Guidelines:

- A. Maximum 50 pages
- B. Information provided must be clear and concise; do not repeat information
- C. Ensure each section speaks to the requested information; and are in the same order listed in the application
- D. All approved Operational Change Requests from 2022 must be reflected in submitted Operating Plan
- E. Everything in the application is contained in a single PDF document

| | |
|---|---|
| MEDICAL CANNABIS CULTIVATION ESTABLISHMENT APPLICATION | Medical Cannabis Program Application Date : _____ <small>(office use only)</small> |
|---|---|

A cannabis cultivation license allows the licensee to propagate, cultivate, harvest, trim, dry, cure, and package cannabis for wholesale or transfer to a cannabis production facility. The licensed facility may produce and sell cannabis plants, seeds, and plant tissue culture to other licensed Utah cannabis cultivation facilities.

Prior to approving an application, the department may contact any applicant and request additional supporting documentation or information. The department may conduct face-to-face interviews with an applicant if needed.

The department shall inspect the premises to determine if the applicant complies with state laws, administrative rules, and best practice standards.

Contact Information

- Ownership Entity: True North of Utah, LLC
 Entity Type: Individual Partnership Corporation Limited Liability Company
- DBA: (assumed name of business) True North Organics

3. Cultivation Facility Address: _____
STREET CITY STATE ZIP

4. 2nd Cultivation Facility Address: _____
STREET CITY STATE ZIP

5. Mailing Address (IF DIFFERENT FROM ABOVE):

STREET CITY STATE ZIP

6. Business Phone: _____ Fax: _____ Other/office: _____

7. Contact Person: Greta Brandt Phone number: _____ Email: _____

8. Contact Person for Inspections: Greta Brandt Phone number: (480) 865-4407
Email: _____

9. Contact Person for Sampling / Results: Greta Brandt Phone number: _____
Email: _____

10. Manager: Brandon Alonzo Phone number: _____ Email: _____

11. Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals: Pharmacy Nos. 003-270; 002-270; Processing No. 7002-20407

12. Ownership Information

4-41a-201(2)(b)(ii)

The name and address of any individual who has:
(A) for a publicly traded company, a financial or voting interest of 2% or greater in the proposed cannabis production establishment;
(B) for a privately held company, a financial or voting interest in the proposed cannabis production establishment; or
(C) the power to direct or cause the management or control of a proposed cannabis production establishment;

List all Owners and their positions in the Company:

| Legal Name | Address | Role in the Company's Finances and Decisions | Listed on initial Application (Yes / No) |
|--------------|---------|--|--|
| See attached | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Cultivation Facility Information

13. Monthly production estimations for the next year. This should include an outline of grow cycles and monthly biomass estimates after drying and curing.

14. List total indoor square footage; grow square footage and outdoor acreage for each cultivation location.

15. If the cannabis grow is still at a temporary facility please include the following:
- Temporary Grow Address.
 - Timeline to have a permanent facility procured, equipped, and operational.

Cultivation Establishment Property Information

16. Days open for business (projected): _____ Days / hours of operation: _____
17. Type of Grow: Indoor Outdoor Both
18. Submit for Company's Current Indoor Cannabis Cultivation Facility:
A Blueprint with:
- the square footage of the areas where cannabis is to be grown;
 - the total number of grow lights per room;
 - the square footage of the areas where cannabis is to be harvested;
 - the areas where cannabis is to be dried, trimmed, and cured;
 - the square footage of the areas where cannabis is to be packaged for wholesale;
 - the total square footage of the cultivation facility;
 - the square footage and location of areas to be used as storerooms;
 - the location of the toilet facilities and hand washing facilities;
 - the location of a break room and location of personal belonging lockers;
 - the location of the areas to be used for loading and unloading of cannabis products for transportation; and
 - the location of all cameras and external lights.
19. Submit for outdoor cannabis cultivation a detailed aerial photograph image with:
- area of separate grow area;
 - note the area where cannabis is to be propagated;
 - the area where cannabis is to be grown;
 - the area where cannabis will be dried, trimmed, and cured (if applicable);
 - the placement of outdoor cameras; and
 - the placement of all external lights.

Operating Plan (Confidential)

- List of all FERTILIZER(S) used by the cultivation facility and an overview of application rates for each state of the grow cycle.
- List all Pesticide(s) used by the cultivation facility and an overview of application rates.
- Outline the timeline and procedure for the facility to *Harvest, Dry, Trim, and Cure* each Harvest Lot.
- Outline procedure for identifying individual plants and inventory control measures for when the plant is moved throughout the facility
- Outline procedure for harvesting/drying/curing process
- Provide all written emergency procedures for Fire, Chemical Spills, and other Emergencies. *This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees.*
- Submit the cannabis cultivation facility's most up-to-date security plan. Security plans shall include:
 - description of security alarm system;
 - person(s) notified of potential security breaches and alerts;
 - Storage Device location / local or cloud device;*
 - Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested

27. Provide the proposed medical cannabis cultivation facility's storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis in accordance to R68-27-12, Minimum Requirements for Storage and Handling of Cannabis.

28. Provide the medical cannabis cultivation facility's written plan and procedures to handle potential recalls and destruction of cannabis because of contamination in accordance to R68-27-11 Recall Protocol.

29. Detail the procedures the cannabis cultivation facility has employed to meet the transport and transfer requirements of Utah Code 4-41a-404 "Cannabis, cannabis product, or medical cannabis device transportation" and Utah Administrative Rule R68-27-10 Transportation.

30. Submit the procedures documenting how the cannabis cultivation facility will dispose of excess and medical cannabis waste in compliance with federal and state laws laid out in Utah Code 4-41a-405 and Rule R68-27-13 Cannabis Waste Disposal.

Compliance

31. Submit proof of a \$100,000 performance bond issued by a surety business.

32. Submit proof all scales used in the facility are certified, as outlined in Utah Administrative Rule 68-27-4 (8). Visit <https://ag.utah.gov/businesses/regulatory-services/weights-measures/> for more information.

33. Submit a current local business license or permit from the city / municipality.

34. Submit the names of all agents currently working at the company's cultivation facility. All agents listed must:

a) be in the process of applying for an agent card in the EVS; or

b) have an agent card and have an account in the EVS.

35. Attach all approved Change Requests to the application.

Licensee understands the current statute and rules are subject to change. Licensees agree as a condition of licensing that they have read and will abide by the provisions of Utah Code 4-41a and all rules promulgated there under all directives of the Utah Department of Agriculture and Food. The licensee also understands that failure to adhere to or maintain the qualifications of their license may result in suspension or revocation of the license and / or forfeiture of the performance bond, or any other remedies allowed by law.

Licensee agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in equipment, remodeling, expansion, reduction or physical non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application in accordance with Utah Administrative Rule 68-27-13.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agent's immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

Disclaimer

The Licensee acknowledges and understands that cultivating, possessing, using, distributing and / or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary.

Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regards to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that he/she has read and understands the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

The undersigned hereby makes application to the Utah Department of Agriculture and Food and certifies that the information contained herein and attached here is true and correct.

Greta Brandt

President

Applicant/Owner of business

Title/Position



11/7/2023

Applicant Signature

Date

MEDICAL CANNABIS CULTIVATION 2024 RENEWAL APPLICATION

(cont.)

OWNERSHIP INFORMATION

12. List all Owners and their positions in the Company.

| Legal Name | Role in the Company's Finances and Decisions | Listed on initial Application | Agent Card (Yes/No) |
|-------------------|--|-------------------------------|---------------------|
| Mike Standlee | Chief Executive Officer | Yes | Yes |
| Greta Brandt | President | Yes | Yes |
| Scott Plew | Chief Financial Officer | Yes | Yes |
| Cody Phillips | Chief Cultivation Officer | No | Yes |
| Dusty Standlee | Investor | Yes | No |
| Billy Salts | Investor | Yes | No |
| Bobby Delgado | Investor | Yes | No |
| Kami Delgado | Investor | Yes | No |
| Timothy Obenchain | Investor | Yes | No |
| Arthur Henry | Investor | Yes | No |
| Kurt Mason | Investor | No | No |
| John Fitzgerald | Investor | No | No |
| Richard Wilson | Investor | No | No |

CULTIVATION FACILITY INFORMATION

13. Monthly production estimates for 2024. This should include an outline of grow cycles and monthly biomass estimates after drying and curing.

RESPONSE:

Monthly Production Estimates

The following projection is primarily based on current production levels at its Brigham City Cultivation Facility¹ (the "Brigham Facility"):

| | |
|-----------------------------|--|
| Harvests per Month | |
| Plants Harvested per Month | |
| Approximate Yield per Month | |

Grow Cycles

Brigham Facility. The greenhouse is

¹

(7) to ten (10) days) to ensure more frequent and proportional biomass harvests that will consistently supply patient demand.

14. List total indoor square footage; grow square footage and outdoor acreage for each cultivation location.

RESPONSE:

| | Indoor Sq. Ft. | Indoor Grow Sq. Ft. | Outdoor Acreage |
|---|----------------|---------------------|-----------------|
| Greenhouse | [REDACTED] | [REDACTED] | [REDACTED] |
| Dry/Cure – Processing Building ² | [REDACTED] | [REDACTED] | [REDACTED] |
| Dry/Cure Rooms 1.0-6.0 | [REDACTED] | [REDACTED] | [REDACTED] |
| Mother Room | [REDACTED] | [REDACTED] | [REDACTED] |
| Clone Room | [REDACTED] | [REDACTED] | [REDACTED] |
| Pipp (Veg) Room | [REDACTED] | [REDACTED] | [REDACTED] |
| Conex #1 (finished goods) | [REDACTED] | [REDACTED] | [REDACTED] |

15. If the cannabis grow is still at a temporary facility, please include the following:

All cultivation operations are located at the Brigham Facility, which is True North’s permanent facility. Accordingly, this question is not applicable.

16. Days open for business (projected) and the days/hours of operation.

RESPONSE:

Brigham Facility: 7 days a week, operating from 6:00 a.m. to 6.00 p.m.

17. Whether the type of grow is indoor, outdoor, or both.

RESPONSE:

Brigham Facility: Indoor.

18. Submit for Company’s current indoor cannabis cultivation facility: A blueprint with: (1) the square footage of the areas where cannabis is grown; (2) the total number of grow lights per room; (3) the square footage of the areas where cannabis is to be harvested; (4) the areas where cannabis is to be dried, trimmed and cured; (5) the square footage of the areas where cannabis is to be packaged for wholesale; (6) the total square footage of the cultivation facility; (7) the square footage and location of areas to be used as storage; (8) the location of the toilet facilities and hand washing facilities; (9) the location of the break room and location



of personal belonging lockers; (10) the location of areas to be used for loading and unloading cannabis products for transportation; and (11) the location of all cameras and external lights.

RESPONSE:

Brigham Facility:

[REDACTED]

EXHIBIT A

EXHIBIT B

EXHIBIT B-1 AND B-2

19. Submit outdoor cannabis cultivation a detailed aerial photograph image with: (1) area of separate grow area; (2) note the area where cannabis is to be propagated; (3) the area where cannabis is to be grown; (4) there area where cannabis will be dried, trimmed and cured (if applicable); (5) the placement of outdoor cameras; and (6) the placement of all external lights.

RESPONSE:

The Brigham Facility currently is an indoor grow facility, only. Accordingly, this question is not applicable.

OPERATING PLAN

20. List of all FERTILIZER(S) used by the cultivation facility and an overview of the application rates for each state of the grow cycle.

RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

21. List all Pesticide(s) used by the Cultivation facility and an overview of application rates.

RESPONSE:

Patient safety is a number priority for True North, and we remain committed to provide patients with products that are not only of the highest quality, but also free from potentially harmful contaminants. Pursuant to this commitment, True North only utilizes natural and biological methods for treating insects and pathogens during the cultivation process. Please see below for an outline of the bioinsecticides and biofungicides that we utilize during grow cycles, including a description of the application rates.

[REDACTED]

[REDACTED]

OxiPhos. This biological treatment consists of a combination of phosphorous acid and

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

22. Outline the timeline for the facility to *Harvest, Dry, Trim, and Cure* each Harvest Lot.

RESPONSE:

True North implements a tightly monitored harvest, dry, trim, and cure schedule to avoid delays in the production cycle and to ensure that patients have a steady supply of high-quality medicine.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

23. Outline procedure for identifying individual plants and inventory control measures for when the plant is moved throughout the facility.

True North takes compliance just as seriously as plant care. We want to ensure that patients receive the best/safest product possible. Anytime a product is physically moved to a new location within the facility, a new solo tag/label is printed to match its new physical location and location in MJ Freeway [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24. Outline procedure for harvesting/drying/curing process.

[REDACTED]

is given a new solo tag/label containing the name of the strain and the name of the room it is being

[REDACTED]

[REDACTED]

[REDACTED]

25. Provide all written emergency procedures for Fire, Chemical Spills, and other Emergencies. *This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees.*

RESPONSE:

A copy of True North's current written emergency procedures for Fire, Chemical Spills, and other Emergencies is attached immediately hereafter (collectively, the "Emergency Protocols"). True North takes employee safety very seriously and all staff is trained on the company's Emergency Protocols as a part of the initial training process. We also confirm that all Emergency Protocols, including the Material Safety Data Sheet, are readily accessible to employees at both the Plymouth Facility and the Brigham Facility.

EMERGENCY PROTOCOLS



TRUE NORTH OF UTAH, LLC

Emergency Response Plan and Procedures

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]



TRUE NORTH OF UTAH, LLC

[REDACTED]

[REDACTED]

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TRUE NORTH OF UTAH, LLC

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TRUE NORTH OF UTAH, LLC

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[REDACTED]

[REDACTED]

[REDACTED]



TRUE NORTH OF UTAH, LLC

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

24. Submit the cannabis cultivation facility's most up-to-date security plan. Security Plans shall include (a) description of the security alarm system; (b) person(s) notified of potential security breaches and alerts; (c) Storage Device location/local or cloud device; and (d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested.

RESPONSE:

A copy of True North's most up-to-date security plan is attached immediately hereafter as Exhibit C. For the Department's ease of reference, we also outlined a high-level summary of the specific information requested by UDAF under this question below.

Security Alarm System.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

Storage Device Location.

[Redacted]

[Redacted]

Procedures for Access.

[Redacted]

26. Submit the cannabis cultivation facility's most up-to-date security plan. Security Plans shall include (a) description of the security alarm system; (b) person(s) notified of potential security breaches and alerts; (c) Storage Device location/local or cloud device; and (d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested.

RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

Storage Device Location.

[Redacted]

[Redacted]

Procedures for Access.

[Redacted]

EXHIBIT C



TRUE NORTH OF UTAH, LLC

Security Policies and Procedures Cannabis Cultivation Facility

[REDACTED]

- [REDACTED]
- [REDACTED]

[REDACTED]

- [REDACTED]

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EXHIBIT A



TRUE NORTH OF UTAH, LLC

Emergency Response Plan and Procedures

[Redacted text block]

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TRUE NORTH OF UTAH, LLC

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TRUE NORTH OF UTAH, LLC

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TRUE NORTH OF UTAH, LLC

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[REDACTED]

[REDACTED]

EXHIBIT B-1

EXHIBIT B-2

EXHIBIT B-3

EXHIBIT B-4

27. Provide the proposed medical cannabis cultivation facility's storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis in accordance to R68-27-12, Minimum Requirements for Storage and Handling of Cannabis.

RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

28. Provide the medical cannabis cultivation facility's written plan and procedures to handle potential recalls and destruction of cannabis because of contamination in accordance to R68-21-11 Recall Protocol.

RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT D

EXHIBIT E

29. Detail the procedures the cannabis cultivation facility has employed to meet the transport and transfer requirements of Utah Code 4-41a-404 “Cannabis, cannabis product, or medical cannabis device transportation” and Utah Administrative Rule R68-27-10 Transportation.

RESPONSE:

A written description of True North’s transportation policies and procedures in compliance with 4-41a-404 and R68-27-10 may be found in Section 3(D)(iii) in True North’s Security Policies and Procedures, attached immediately hereafter.

TRANSPORTATION POLICIES AND PROCEDURES

30. Submit the procedures documenting how the cannabis cultivation facility will dispose of excess and medical cannabis waste in compliance with federal and state laws laid out in Utah Code 4-41a-405 and Rule R68-27-13 Cannabis Waste Disposal.

RESPONSE:

True North implements medical cannabis waste disposal protocols that effectively renders said waste unusable while remaining compliant with 4-41a-405, R68-27-13, and all other applicable laws.

[REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

COMPLIANCE

31. Submit proof of a \$100,000 performance bond issued by a surety business.

RESPONSE:

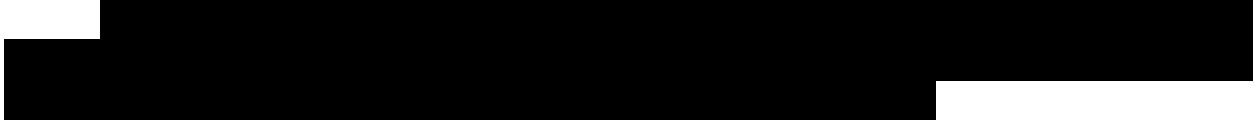


EXHIBIT F

EXHIBIT G

EXHIBIT H



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

February 7, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in blue ink, appearing to read "Cody James".

Cody James
Manager, Cannabis and Industrial Hemp



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

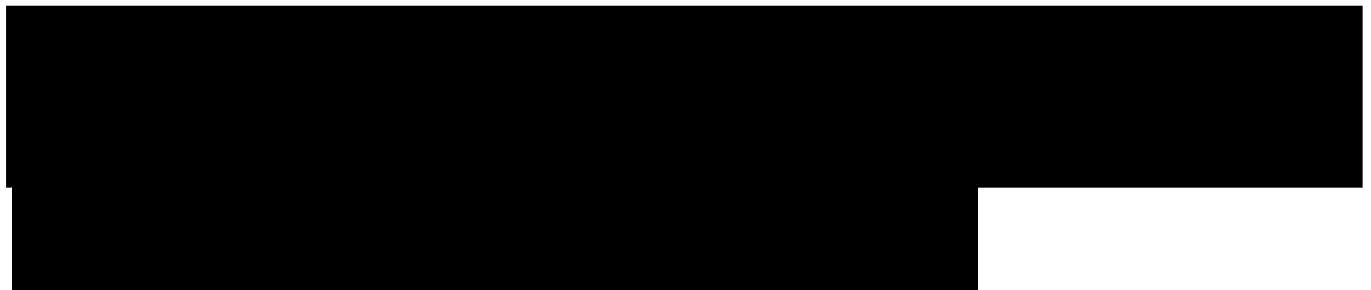
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

May 11, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in blue ink, appearing to read "AI", is written below the "Sincerely," text.

Aimee Isom
Program Manager, Medical Cannabis



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

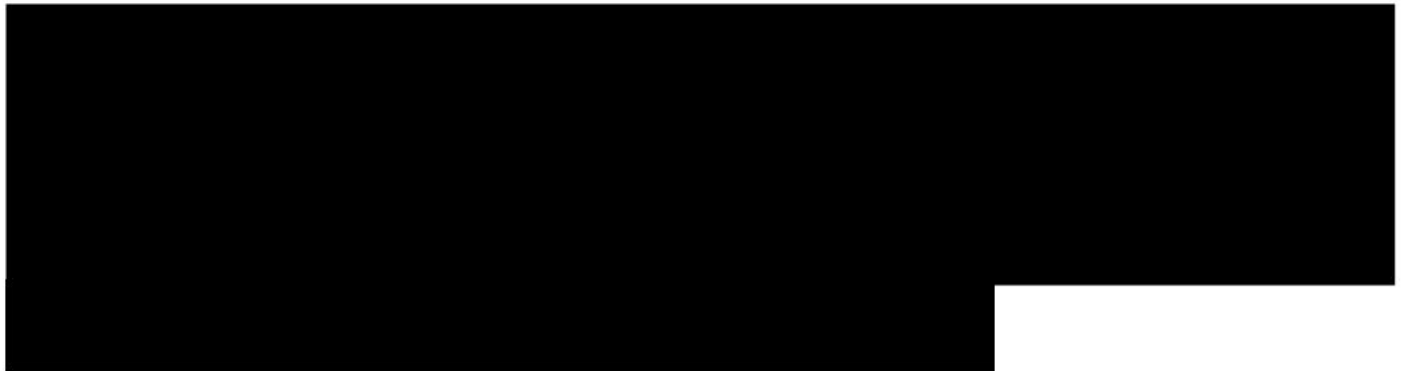
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

May 5, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in black ink, appearing to be "AI", written in a cursive style.

Aimee Isom
Program Manager, Medical Cannabis



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

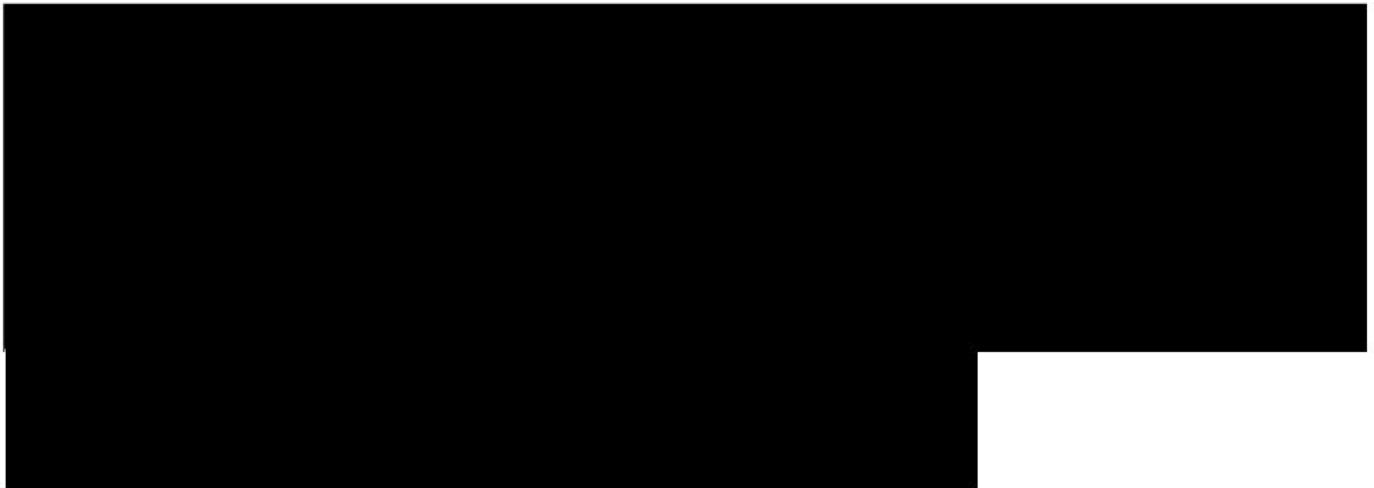
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

August 16, 2023

Dear True North Cultivation



Sincerely,

A handwritten signature in black ink, appearing to be "AI" or "Aimee".

Aimee Isom
Program Manager, Medical Cannabis



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and
Food

CRAIG W. BUTTARS
Commissioner

KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD
Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

October 12, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in black ink, appearing to be "AI" or "Aimee Isom".

Aimee Isom
Program Manager, Medical Cannabis



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

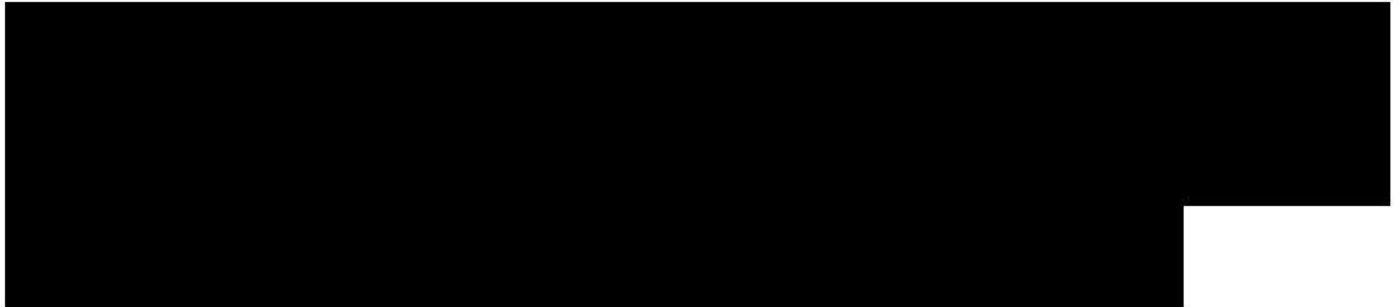
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

March 21, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in blue ink, appearing to read "Cody James".

Cody James
Manager, Cannabis and Industrial Hemp



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

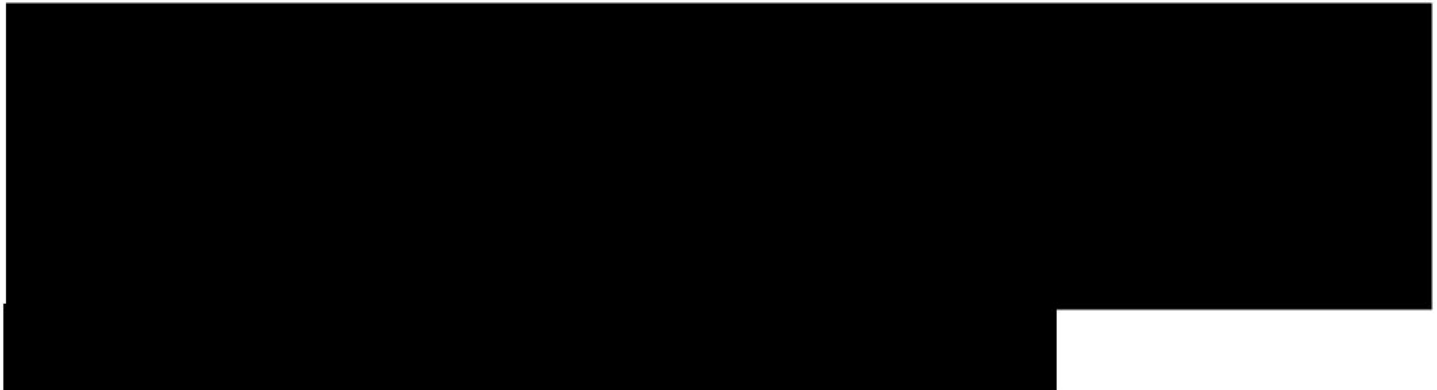
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

February 7, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in blue ink, appearing to read "Cody James".

Cody James
Manager, Cannabis and Industrial Hemp



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

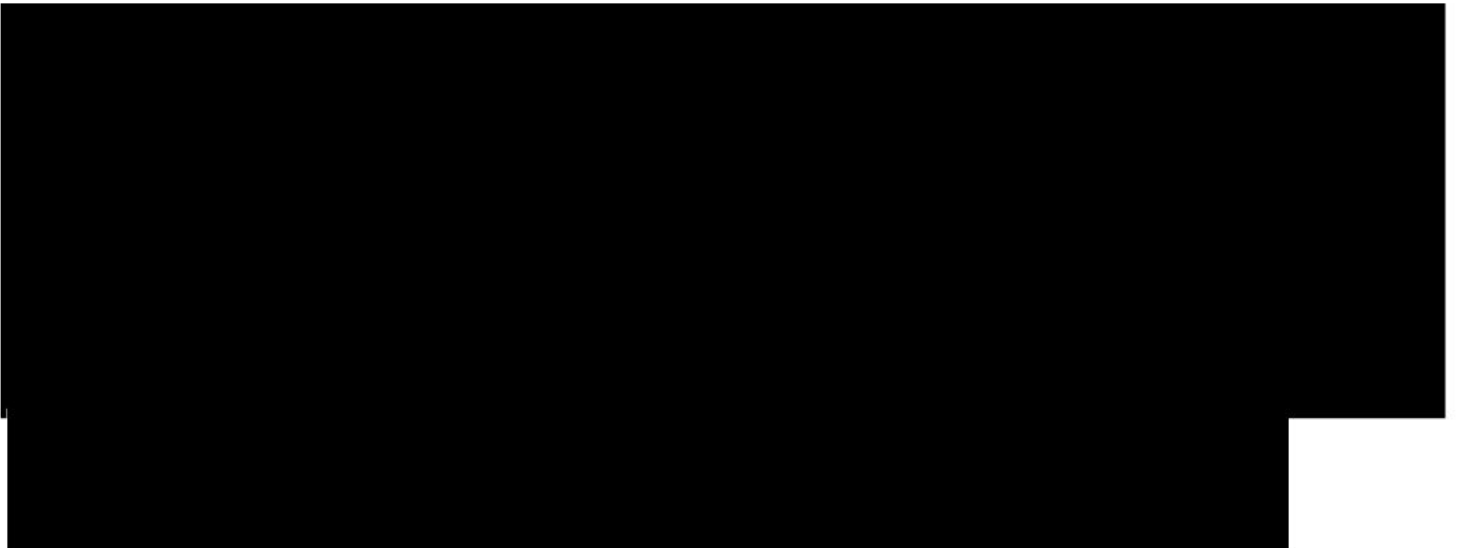
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD
Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

August 3, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in black ink, appearing to be "AI" or "Aimee".

Aimee Isom
Program Manager, Medical Cannabis



State of Utah

SPENCER J. COX
Governor

DEIDRE M. HENDERSON
Lieutenant Governor

Department of Agriculture and Food

CRAIG W. BUTTARS
Commissioner

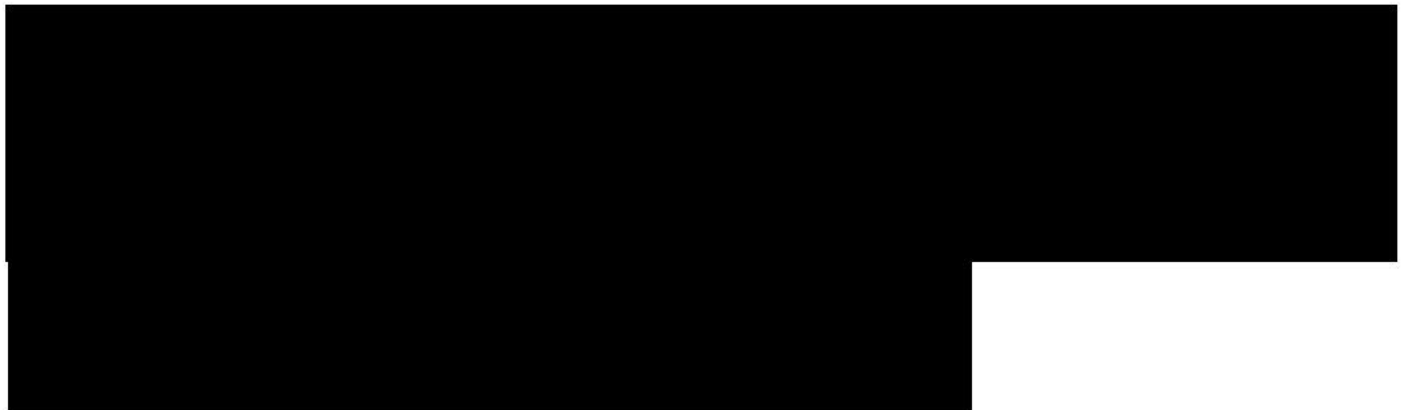
KELLY PEHRSON
Deputy Commissioner

DEPARTMENT OF AGRICULTURE AND FOOD Industrial Hemp and Medical Cannabis Program

Operation Change Request Response

April 14, 2023

Dear True North Cultivation,



Sincerely,

A handwritten signature in black ink, appearing to read "AI".

Aimee Isom
Program Manager, Medical Cannabis



PRODUCTION FACILITY CHANGE REQUEST
UTAH DEPARTMENT OF AGRICULTURE AND FOOD

| | |
|-------------------------|---------------------|
| Application Type | Cultivation Renewal |
|-------------------------|---------------------|

Summary of Proposed Change (This statement will be read at the public Licensing Board Meeting)
This change request is to add the scale registration and bond to the business license.

General Information

The Application submitted by a Cannabis Production Establishment and approved by the Establishment Board will be considered the business’s operation plan. UDAF Inspectors will use the operation plan for regulatory purposes. Ensure all information is complete, current, and accurate.

The information provided by the applicant for a Medical Cannabis Production Establishment must fit within the following Guidelines:

- A. Maximum 50 pages
- B. Information provided must be clear and concise; do not repeat information
- C. Ensure each section speaks to the requested information and appear in the same order as application
- D. Everything in the application is contained in a single PDF document.

| | |
|-------------------------|------------|
| Application Date | 11/07/2023 |
|-------------------------|------------|

| | |
|---------------------|---------------------------|
| Legal Status | Limited Liability Company |
|---------------------|---------------------------|

The 2023 renewal document must be submitted to the Utah Department of Agriculture and Food by . The document submitted to the Department will be considered the notice of intent to renew specified in R68-27-15. A UDAF Establishment Approval Board Meeting will be held in mid-December to officially approve or request changes to the business plans submitted. To renew an Establishment License Application, an approved Medical Cannabis Establishment must submit the \$100,000 annual licensing fee by December 31st. If the licensing fee and intent to renew are not submitted by December 31st, the licensee shall not continue to operate.

A cannabis cultivation license allows the licensee to propagate, cultivate, harvest, trim, dry, cure, and package cannabis for wholesale or transfer to a cannabis production facility. The licensed facility may produce and sell cannabis plants, seeds, and plant tissue culture to other licensed Utah cannabis cultivation facilities.

Prior to approving an application, the department may contact any applicant and request additional supporting documentation or information. The department may conduct face-to-face interviews with an applicant if needed.

The department shall inspect the premises to determine if the applicant complies with state laws, administrative rules, and best practice standards.

Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals:
Pharmacy Nos. 003-270; 002-270; Processing No. 7002-20407

Operating Plan

Submit the cannabis processing facility's most up-to-date security plan. Security plans shall include:

- a) Description of security alarm system,
- b) Person(s) notified of potential security breaches and alerts
- c) Video storage device location: local or cloud storage
- d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested.
- e) Any additional security measure in place that exceed the security requirements Attached

Describe the medical cannabis facility's inventory control system; Detail the procedures the cannabis facility will employ to meet the Inventory Control System requirements of Utah Code 4-41a-103 Inventory Control System and Utah Administrative Rule related to Inventory Control. Including a description of how the facility will be compliance with section 26-61a-103 and use the state electronic verification system to track facility agents.

Attached

Provide the proposed cannabis facility storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis

Attached

Provide all written emergency procedures to be followed in case of fire, chemical spill and other emergencies at the cannabis facility. This information plus the Material Safety Data Sheet (MSDS) must be easily accessed by all employees.

Attached

Submit the proposed cannabis facility's waste disposal plan. Explain how the facility will operate in a way meets all requirements of Utah Code 4-41a-405 Excess and disposal and applicable Utah Administrative Cannabis waste disposal.

Attached

Detail the procedures the cannabis facility will employ to meet the transport and transfer requirements of Utah Code 4-41a-404 Medical cannabis transportation. Include the cannabis facility's sample transport and transfer plan in accordance with all applicable Utah Administrative Rules regarding the transportation of medical cannabis.

Attached

Monthly production estimations for the next year. This should include an outline of grow cycles and monthly biomass estimates after drying and curing. (Table Format)

Attached

List of all FERTILIZER(S) used by the cultivation facility and an overview of application rates for each state of the grow cycle.

Attached

List all PESTICIDE(S) used by the cultivation facility and an overview of application rates.

Attached

Outline the timeline and procedure for the facility to Harvest, Dry, Trim, and Cure each Harvest Lot.

Attached

Provide the medical cannabis cultivation facility's written plan and procedures to handle potential recalls and destruction of cannabis because of contamination in accordance to R68-27-11 Recall Protocol.

Attached

Compliance

Upload either a copy of current local business license or a letter from the city/municipality stating their intent to issue a business license once the facility is licensed as a Medical Cannabis Establishment.

Attached

Submit the names of all agents currently working at the company's processing facility. All agents listed must: a) be in the process of applying for an agent card in the EVS; or b) have an agent card and have an account in the EVS. The Facility is responsible for ensuring all employees have background checks and are registered in the EVS. The company is also responsible for collecting agent cards and notifying the Department when an agent leaves their facility. Failure to comply will result in a citation and a fine to the company.

Attached

The facility understands all scales must be certified, as outlined in Utah Administrative Rule 68-28-4 (8). Visit <https://ag.utah.gov/businesses/regulatory-services/weights-measures/> for more information.

Licensee understands the current statute and rules are subject to change. Licensees agree as a condition of licensing that they have read and will abide by the provisions of Utah Code 4-41a and all rules promulgated there under all directives of the Utah Department of Agriculture and Food. The licensee also understands that failure to adhere to or maintain the qualifications of their license may result in suspension or revocation of the license and / or forfeiture of the performance bond, or any other remedies allowed by law.

Licensee agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in equipment, remodeling, expansion, reduction or physical non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application in accordance with Utah Administrative Rule 68-27-13.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agent's immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

The Licensee acknowledges and understands that cultivating, possessing, using, distributing and / or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary.

Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regards to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that he/she has read and understands the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

Status of Change Request

Draft

Applicant/Owner of Business:

Greta Brandt

Title/Position:

President

Applicant Signature



Date

COMPLIANCE

31. Submit proof of a \$100,000 performance bond issued by a surety business.

RESPONSE:

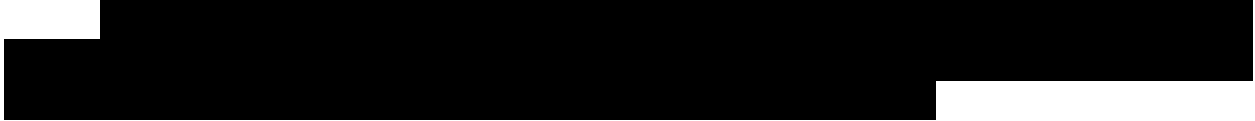


EXHIBIT F

32. Submit proof all scales used in the facility are certified, as outlined in Utah Administrative Rule 68-27-4(8).

RESPONSE:





PRODUCTION FACILITY CHANGE REQUEST
UTAH DEPARTMENT OF AGRICULTURE AND FOOD

| | |
|--|---------------------------|
| Application Type | Cultivation Renewal |
| Summary of Proposed Change (This statement will be read at the public Licensing Board Meeting) This change request is to update the inventory control attachment that was submitted with the original application. | |
| General Information | |
| <p>The Application submitted by a Cannabis Production Establishment and approved by the Establishment Board will be considered the business’s operation plan. UDAF Inspectors will use the operation plan for regulatory purposes. Ensure all information is complete, current, and accurate.</p> <p>The information provided by the applicant for a Medical Cannabis Production Establishment must fit within the following Guidelines:</p> <ul style="list-style-type: none">A. Maximum 50 pagesB. Information provided must be clear and concise; do not repeat informationC. Ensure each section speaks to the requested information and appear in the same order as applicationD. Everything in the application is contained in a single PDF document. | |
| Application Date | 11/07/2023 |
| Legal Status | Limited Liability Company |
| <p>The 2023 renewal document must be submitted to the Utah Department of Agriculture and Food by . The document submitted to the Department will be considered the notice of intent to renew specified in R68-27-15. A UDAF Establishment Approval Board Meeting will be held in mid-December to officially approve or request changes to the business plans submitted. To renew an Establishment License Application, an approved Medical Cannabis Establishment must submit the \$100,000 annual licensing fee by December 31st. If the licensing fee and intent to renew are not submitted by December 31st, the licensee shall not continue to operate.</p> <p><i>A cannabis cultivation license allows the licensee to propagate, cultivate, harvest, trim, dry, cure, and package cannabis for wholesale or transfer to a cannabis production facility. The licensed facility may produce and sell cannabis plants, seeds, and plant tissue culture to other licensed Utah cannabis cultivation facilities.</i></p> <p><i>Prior to approving an application, the department may contact any applicant and request additional supporting documentation or information. The department may conduct face-to-face interviews with an applicant if needed.</i></p> <p><i>The department shall inspect the premises to determine if the applicant complies with state laws, administrative rules, and best practice standards.</i></p> | |
| Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals: Pharmacy Nos. 003-270; 002-270; Processing No. 7002-20407 | |

Operating Plan

Submit the cannabis processing facility's most up-to-date security plan. Security plans shall include:

- a) Description of security alarm system,
- b) Person(s) notified of potential security breaches and alerts
- c) Video storage device location: local or cloud storage
- d) Procedures to provide UDAF inspectors immediate access to current and archived video footage when requested.
- e) Any additional security measure in place that exceed the security requirements Attached

Describe the medical cannabis facility's inventory control system; Detail the procedures the cannabis facility will employ to meet the Inventory Control System requirements of Utah Code 4-41a-103 Inventory Control System and Utah Administrative Rule related to Inventory Control. Including a description of how the facility will be compliance with section 26-61a-103 and use the state electronic verification system to track facility agents.

Attached

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Attached

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Attached

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Attached

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Attached

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Attached

List of all FERTILIZER(S) used by the cultivation facility and an overview of application rates for each state of the grow cycle.

Attached

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Attached

Provide the medical cannabis cultivation facility's written plan and procedures to handle potential recalls and destruction of cannabis because of contamination in accordance to R68-27-11 Recall Protocol.

Attached

Compliance

Upload either a copy of current local business license or a letter from the city/municipality stating their intent to issue a business license once the facility is licensed as a Medical Cannabis Establishment.

Attached

Submit the names of all agents currently working at the company's processing facility. All agents listed must: a) be in the process of applying for an agent card in the EVS; or b) have an agent card and have an account in the EVS. The Facility is responsible for ensuring all employees have background checks and are registered in the EVS. The company is also responsible for collecting agent cards and notifying the Department when an agent leaves their facility. Failure to comply will result in a citation and a fine to the company.

Attached

The facility understands all scales must be certified, as outlined in Utah Administrative Rule 68-28-4 (8). Visit <https://ag.utah.gov/businesses/regulatory-services/weights-measures/> for more information.

Licensee understands the current statute and rules are subject to change. Licensees agree as a condition of licensing that they have read and will abide by the provisions of Utah Code 4-41a and all rules promulgated there under all directives of the Utah Department of Agriculture and Food. The licensee also understands that failure to adhere to or maintain the qualifications of their license may result in suspension or revocation of the license and / or forfeiture of the performance bond, or any other remedies allowed by law.

Licensee agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in equipment, remodeling, expansion, reduction or physical non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application in accordance with Utah Administrative Rule 68-27-13.

The undersigned acknowledges that representatives of the Utah Department of Agriculture and Food may inspect the records and facility of a cannabis production establishment at any time during business hours to determine and ensure the cannabis production establishment is in compliance with the law. Failure to provide the department or the department's authorized agent's immediate access to records and facilities during business hours in accordance with this section may result in a civil monetary penalty; license or registration suspension or revocation; or an immediate cessation of operations under a cease and desist order issued by the department.

The Licensee acknowledges and understands that cultivating, possessing, using, distributing and / or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary.

Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regards to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

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Status of Change Request

Draft

Applicant/Owner of Business:

Greta Brandt

Title/Position:

President



Date



PRODUCTION FACILITY CHANGE REQUEST

UTAH DEPARTMENT OF AGRICULTURE AND FOOD

| | |
|---|---------------------------|
| Application Type | Cultivation Renewal |
| Summary of Proposed Change (This statement will be read at the public Licensing Board Meeting) This change request is to remove the waste information that was erroneously uploaded into the transportation section and add the required transportation information to the cultivation renewal application. | |
| General Information | |
| The Application submitted by a Cannabis Production Establishment and approved by the Establishment Board will be considered the business's operation plan. UDAF Inspectors will use the operation plan for regulatory purposes. Ensure all information is complete, current, and accurate. | |
| The information provided by the applicant for a Medical Cannabis Production Establishment must fit within the following Guidelines: A. Maximum 50 pages B. Information provided must be clear and concise; do not repeat information C. Ensure each section speaks to the requested information and appear in the same order as application D. Everything in the application is contained in a single PDF document. | |
| Application Date | 11/07/2023 |
| Legal Status | Limited Liability Company |
| The 2023 renewal document must be submitted to the Utah Department of Agriculture and Food by . The document submitted to the Department will be considered the notice of intent to renew specified in R68-27-15. A UDAF Establishment Approval Board Meeting will be held in mid-December to officially approve or request changes to the business plans submitted. To renew an Establishment License Application, an approved Medical Cannabis Establishment must submit the \$100,000 annual licensing fee by December 31st. If the licensing fee and intent to renew are not submitted by December 31st, the licensee shall not continue to operate. | |
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| Other industrial hemp and/or medical cannabis licenses currently or previously held by applicant/entity/principals: Pharmacy Nos. 003-270; 002-270; Processing No. 7002-20407 | |

Operating Plan

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Attached

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Attached

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Attached

Submit the names of all agents currently working at the company's processing facility. All agents listed must: a) be in the process of applying for an agent card in the EVS; or b) have an agent card and have an account in the EVS. The Facility is responsible for ensuring all employees have background checks and are registered in the EVS. The company is also responsible for collecting agent cards and notifying the Department when an agent leaves their facility. Failure to comply will result in a citation and a fine to the company.

Attached

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Licensee understands the current statute and rules are subject to change. Licensees agree as a condition of licensing that they have read and will abide by the provisions of Utah Code 4-41a and all rules promulgated there under all directives of the Utah Department of Agriculture and Food. The licensee also understands that failure to adhere to or maintain the qualifications of their license may result in suspension or revocation of the license and / or forfeiture of the performance bond, or any other remedies allowed by law.

Licensee agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, change in equipment, remodeling, expansion, reduction or physical non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application in accordance with Utah Administrative Rule 68-27-13.

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The Licensee acknowledges and understands that cultivating, possessing, using, distributing and / or selling marijuana is prohibited by federal law, notwithstanding Utah law or any authorizations in the Agent or this Registration to the contrary.

Nothing in this Application is intended to provide any guidance or assistance in violating or complying with existing federal laws regulating marijuana cultivation, distribution, or use. Similarly, compliance with state law or the terms of this registration, or possession of the registration card does not confer immunity from enforcement of federal law or federal enforcement practices. Further, nothing in this application or the registration card shall be construed as advice with regards to compliance with applicable federal, state, or local tax laws or any regulatory consequences of engaging in any business in this industry.

The undersigned acknowledges that he/she has read and understands the statements herein and the execution thereof is done voluntarily and by the authorization of the applicant entity.

Status of Change Request

Draft

Applicant/Owner of Business:

Greta Brandt

President



Date

TRANSPORTATION POLICIES AND PROCEDURES

