

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 and processing 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 Processing 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: Alyssa Sofferin

On behalf of (company): Date: June 4, 2024



CONFIDENTIAL – NOT FOR REDISTRIBUTION

May 15, 2024

Sent Via E-Mail Only, annaferrin@utah.gov

Attn: Mr. Cody James
Manager, Industrial Hemp and Medical Cannabis Program
Utah Department of Agriculture and Food
350 N. Redwood Rd.,
Salt Lake City, UT 84116

**Re: Establishment Board Hearing – Processing License Renewal
True North of Utah, LLC, d/b/a The Flower Shop (“True North”)
Cannabis Processing License No. 7002-20407**

Dear Mr. James:

True North submits the enclosed Medical Cannabis Processing Renewal Application to the Cannabis Production Establishment Board (the “Board”), pursuant to the request of your department, in advance of its June 12, 2024, hearing to request renewal of the above-referenced processing license.

If any additional information is needed, feel free to contact me.

Sincerely,

Alyssa A. Sofferin
Director of Compliance.

1. Ownership and Contact Information:

Ownership Entity: True North of Utah, LLC

Business Contact:

Name: [REDACTED] **Business Phone:** [REDACTED]
Fax: N/A **Other Office:** N/A
Email: [REDACTED]

Facility Manager Contact:

Name: [REDACTED] **Business Phone:** [REDACTED]
Email: [REDACTED]

Contact Person for Inspection:

Name: [REDACTED] **Business Phone:** [REDACTED]
Email: [REDACTED]

Contact Person for [REDACTED]

[REDACTED] **Business Phone:** [REDACTED]
Email: [REDACTED]

DBA: Assumed Name of Business:

The Flower Shop

Facility Address: [REDACTED]
[REDACTED]

Mailing Address: Same as Facility Address

List all Owners and their positions in the Company.

[illegible]**Property Information:****Days & Hours of Operation:**

Proximity:

[REDACTED]

Response: True North of Utah confirms this requirement.

Processing Establishment Property Information:

[REDACTED]

EXHIBIT A

EXHIBIT B



TRUE NORTH OF UTAH, LLC

Security Policies and Procedures

Cannabis Processing Facility

Updated: 03/23/2023

