

08-13-2025 Medical Cannabis Production Establishment Board Meeting Minutes

Deputy Commissioner Amber Brown Calls Meeting To Order - Utah Department of Agriculture and Food

Members in Attendance:

Commissioner Kelly Pehrson
Deputy Commissioner Amber Brown
Dr. Edward Walker
Miles Maynes
Susan Spiers
Brad Winter
Chief Jason Williams
Drew Gubler

- Miles Maynes moves to approve the 6-11-2025 Medical Cannabis Production Establishment Board Meeting Minutes
 - All Present - YES

Deputy Commissioner Amber Brown Reads Public Comment Guidelines: “All participants will be muted until asked to speak by the board. If you are a company representative please click Raise Hand when it is your time to speak and one of our admin will unmute you. During the public comment period please type in the chat box or click Raise Hand to be called on by the board, at which point you will be unmuted. Thank you to everyone for working with the department to ensure a professional and efficient meeting.”

2025 Establishment Licencing Board Dates

October 9th | Documentation Deadline: September 11th

December 4th | Documentation Deadline: November 6th

Academic Medical Cannabis Research License Approval: Utah State University

Cody James Introduces Utah State University: “I’ll just go into a quick summary of what’s going on. And then Dr. Bugbee can be the person to go into more of a description. So Dr. Bruce Bugbee from Utah State University submitted an application for an academic medical cannabis research license. Reviewing that plan looks like USU plans to research cannabis cultivation best practices. I think the department is always looking forward to any type of research that comes forward for that. But with that being said, I’ll turn it back to the Board and maybe Dr. Bugbee.”

Utah State University States: “Just a little background to this. In 2018, when low THC cannabis became federally legal, low THC, what most call Hemp. We got a state and USDA license to grow low THC cannabis here in the research greenhouse facility at Utah State University. And we’ve been doing that now for six, seven years. But the Center for Medical Cannabis Research, funded by the legislature, has asked us to work toward getting a federal DEA license to grow high THC cannabis. The federal license first required a state license, which is what this is about. And that, this started more than a year ago, and we spent almost a year working with the University on security. All the risk management people, and putting additional cameras and more prox carbox in this building. It took quite a while to get all that installed, but finally, the University, all the way to the President of the University, was satisfied with our security protocols. And then we submitted this about three or four months ago to the state. And then we’ve been waiting, they’ve never been through a summary deal with the people, and then we’ve been waiting for that time to get this meeting. So this isn’t a big change for us because we’re already continuously growing low THC cannabis in a secure facility, but this license would be to also do high THC genetics in the same facility with higher level of security and more tracking as detailed in our proposal that tracking we’re gonna do. That proposal, by the way, matches the UDAF outline for what they would like to see happen. So that’s a quick genesis of our proposal. The last page, which I filed a GRAMA confidentiality request on, shows a diagram of the building with all the trucks, carbox, and all the security cameras. Unlike commercial facilities, we have multiple small grow chambers here. We never grow cannabis in very big quantities. I mean, 100 grams would be a lot for us. And we never sell it. We just grow it, weigh it, analyze it, and destroy it. We haven’t to this point. A DEA license would allow us to provide cannabis to the University of Utah Medical School and that’s a huge reason that the state is interested, state legislature and our CMCR is interested in us getting the license so that we can do that. In the short term, our work here is to study safety of the cannabis, microbial counts, how do we keep microbial pens and counts low in their own very high quality. They’re called pharmaceutical grade cannabis farmers. And also environmental effects that determine cannabinoid content. That’s a very big deal because we want to know what the cannabinoid content is from all of our state roads. How do they optimize their grows? So our research is on genetic and environmental changes to optimize cannabis safety and quality. And this license will allow us to use additional genetics in our research.”

- Deputy Commissioner Amber Brown opened Medical Cannabis Production Establishment Board Questions;

Q. Miles Maynes: “How much interaction have you had with the current license cultivators in the state?”

A. Utah State University: "I would say some, mostly limited. In some ways, as an agricultural university that has an extension, our mission is to help all those cultivators, but my particular role at the university is just research and teaching. So I would say when they ask questions, we try to answer them. Maybe that's the best answer. We have gotten research funding through growers for our research, but interestingly enough it's been growers out of the state of Utah. One of the Utah growers did fund our research for a while, and that was Pineae Greenhouse, but they have since stopped cultivating cannabis, and they provided a small amount of funding a few years ago. But that's, we don't get funding, I guess I could say sort of unfortunately, we don't get funding through any of the Utah growers."

Q. Miles Maynes: "It sounds like you're open to collaboration."

A. Utah State University: "That's right. We haven't reached out to them aggressively. We've had conversations with some of them, mostly answering their questions on how to get higher quality and better safety, those kinds of things. But we haven't tried to reach out to them to help, and we believe more respond to their questions."

Q. Dr. Edward Walker: "I have one question I'd like to ask, and that is, well, maybe a preliminary comment, it's nice to have this research going on here in the state to facilitate a lot of things and it really helps increase our knowledge base. Most of our growers and producers here within the state are focused on growing cannabis inside in a controlled environment. We've heard comments occasionally that some of the hybrids are a little, wouldn't do too well out in the real world outside. Most of your research is going to focus, I presume, on inside growing without any outside growing area. Is that correct?"

A. Utah State University: "Sort of, it's partially correct, let me say that. We do grow a lot of stuff in this facility under electric lights, sole source lighting. We also grow cannabis in greenhouses here, the secure greenhouse sections. We got 20 sections and two of them are devoted to cannabis research. But we do not, so far we have not drawn an outside and this proposal is not for anything outside. That poses a lot more security concerns. But personally, I see long-term evolution to be, to keep the cost low and to make, to get rid of the black market, the cost of legal cannabis have to be low. So there's not an economic incentive to buy black market cannabis. And I think at some point in the future we're going to see more outside production. And we're working on breeding cannabis to be better suited for outside production. Even though we don't test it outside, but we work a lot with the University of Mississippi that has a, well not a lot, but some. Because they have a federal license to grow high THC cannabis. And they've been exclusively growing outside until recent years. The extra security meant that they were moving inside under electric lights. And they came to us and they said, can you help us grow inside under electric lights? So the quick answer to that is this is all a hybrid between indoors under electric lights, green houses, and eventually some ill production."

Q. Dr. Edward Walker: "You know, one of the things we're concerned about a lot of times in licensing is where the product is grown. It's nice to hear you've got some, you know, regular solar lighting, you know, sunlight, as well as indoor. But, you know, when we work with other companies that are commercial companies, we're very concerned about how many square feet, the number of plants, all those kinds of controls. And I just wanted to make sure that you're going to have some tight controls like that within your research area."

A. Utah State University: "Yes, I don't remember exactly how many pages our proposal was, but it's pretty long. I mean, it's pretty detailed on exactly the security procedures. And honestly, that was mostly the satisfied university legal counsel and university risk management. I mean, they were pretty anal on this. They worried about somebody suing us. So that we spent quite a bit of time back and forth with them until they were comfortable with all this."

- **Deputy Commissioner Amber Brown opened Public Comments; Public Comments were closed**

- **Miles Maynes moves to approve the Academic Medical Cannabis Research License for Utah State University**
 - **Motion Seconded - Dr. Edward Walker**
 - **All Present - YES**

Medical Cannabis Change Request Approval: Pure Plan

Cody James Introduces Pure Plan: "So Pure Plan is a Tier 1 Processor who has recently submitted a change request to update their hash standard operating plan. They're wanting to include, or to add, I should say, a new piece of equipment, which is the plasma trichrome separator or the SIFSCREEN sifter. The additional equipment changes the formulation SOP that they have, which is why it's being brought to the board for review. I think the licensee would probably be the best person to go into detail on what's going to go on within their SOPs. But I will say that if the board does approve this change request, then there will be a need for some additional inspections from us in both regulatory services for some GMP aspects."

- **Deputy Commissioner Amber Brown opened Medical Cannabis Production Establishment Board Questions;**

Q. Dr. Edward Walker: "By moving to cyclone, you'll probably increase your yield. Do you anticipate a higher production level is coming here with that?"

A. Pure Plan: “You know it's more of a, you'll actually reduce the yield because we're removing impurities. So basically this machine has two positively charged plates, one negative, one positive, and as material falls through the trichome heads, the part of the plant we want is going to stick to one side and then the other part, which is the waste or the green material, is going to stick to the other side. And so really it's actually improving the quality and improving the overall benefit of the plant there. We're getting rid of, you know, so called waste. So it'll cut our yields in half, but what we'll have is an actual better product.”

Q. Dr. Edward Walker: “So the content you want would greatly improve. So, like, your total cannabinoids will go up, but the total mass will go down.”

A. Pure Plan: “Yes, and it's actually a great product for the medical patients because it truly is a solventless product. So there is no anything being used in it, no butane, no ethanol, no water. It's pure solventless.”

Q. Brad Winter: “So have you done testing with this machine before, or can you not do that until we've approved it?”

A. Pure Plan: “Yeah, we can't test much until it's approved, but dry sift has been around for many, many years. And so the old standard is really to take screens and rub your cannabis flower or shake over those screens, and then you isolate those trichomes. This is just a production machine to eliminate sitting there with humans scrubbing it over screens to capture those trichome heads.”

Dr. Edward Walker States: “Madam Chairman, I just wanted to mention, based on comments given here, I was going to say, Cody, as we look toward the future toward quotas and things where a production facility tells us how much they can produce in a year, we may want to look not only in production, but quality in a case like this where you might say a real high-quality product might get a little more attention or some measurement tool that could compare them to others for production.”

- **Deputy Commissioner Amber Brown opened Public Comments; Public Comments were closed**

- **Dr. Edward Walker moves to approve the Medical Cannabis Change Request for Pure Plan**
 - **Motion Seconded - Miles Maynes**
 - **All Present - YES**

Medical Cannabis Change Request Approval: Tryke Processing

Cody James Introduces Tryke Processing: “Tryke is one of our Tier 1 Processors here in the state. They've submitted, actually, two change requests that we'll talk about right here. One is to add extraction and post-processing methods to their license. The change request includes an additional extraction method, a Vitalis CO2 extraction unit, and a change request to also add, as I mentioned, the post-processing distillation process to their facility. Again, this is a situation where the board does approve the equipment and will need to be inspected for good manufacturing practices regulations.”

Tryke Processing States: “Alan Roth, Director of Compliance and National Initiatives for Curaleaf and Tryke. Yeah, the Tryke facility in Tooele has been approved for processing when we acquired it. We closed down processing there because we had very good facilities in North Salt Lake. There's an initiative now to consider either consolidation of the two facilities or continuation of both facilities separately. So we're looking to add in a CO2 machine called Vitalis into the already approved processing room. The post-processing equipment would be running under the same SOPs and likely the same equipment as is already approved for the North Salt Lake facility. We are already approved, by the way, from the last board meeting to begin infrastructure build out for the Vitalis and for all the post-processing. So this is the follow-up to once we finish that to begin using such.”

- **Deputy Commissioner Amber Brown opened Medical Cannabis Production Establishment Board Questions;**

Q. Miles Maynes: “Is all your processing in North Salt Lake right now?”

A. Tryke Processing: “Yes, for manufactured product. Obviously, there's some packaging that continues at Tooele for flower. We have approval for hash rosin at Tooele, but it was really mostly for R&D. So we'll be rebuilding out the whole room.”

Q. Miles Maynes: “Is that the intention moving forward, if you were to consolidate?”

A. Tryke Processing: “They haven't fully made the decision yet whether they want to run both facilities simultaneously or just consolidate the two together to one. So the manner in which this and the other ops plan change requests that were submitted allows the freedom to handle the distinct phases. As they get more clarity on how they want to handle things.”

Q. Dr. Edward Walker: “I know that you use supercritical fluid, CO2, for extraction in North Salt Lake, correct? We were fortunate enough as a board to be able to tour that facility a while back. When you say a CO2 machine in Tooele, is that for supercritical fluid?”

A. Tryke Processing: “Yes, it's just a lingo for the same technology. I remember the tour well. The equipment that you saw in North Salt Lake is made by a company called Waters. This is by a company called Vitalis. It's quite an upgrade in yield, output. It's a much larger machinery from, yeah. So it's definitely a step up.”

Q. Dr. Edward Walker: “So will this processing take place out there in Tooele?”

A. Tryke Processing: “It will take place in Tooele. Again, at the moment they're going to continue with the Water's equipment at North Salt Lake. And then just figure out how they want to do things moving forward.”

- **Deputy Commissioner Amber Brown opened Public Comments; Public Comments were closed**

- **Miles Maynes moves to approve the Medical Cannabis Change Request for Tryke Processing**
 - **Motion Seconded - Dr. Edward Walker**
 - **All Present - YES**

Medical Cannabis Change Request Approval: Tryke Processing

Cody James Introduces Tryke Processing: “Yep. We will definitely stick with Tryke. And these are for the next three or the five change requests that Alan mentioned. So these are for product formulations. Tryke is requesting to add the following products to their Tier 1 licensed production line. Gummies, vape cartridges, and concentrated liquid. The product formulations have been submitted to the department and seem to check out.”

Tryke Processing States: “Okay, again, Alan Roth, Director of Compliance, Curaleaf and Tryke. So these three ops plan change requests are for SOPs and products that are currently being manufactured at the North Salt Lake facility, are approved for such, there is no change in SOPs. Same processes. The reason this is happening is that after discussing with the UDAF team as to how to handle this potential step forward, is determined that if Curaleaf chose to do a transfer, change of location, of the Curaleaf North Salt Lake license to Tooele, it would just be a change of location. But it would offer no phase possibilities. Everything would need to happen at once. It's very limited in its options. So by actually transferring each and every process currently approved at the North Salt Lake facility to the Tooele facility, it allows the ability to handle these changes in phases. And secondarily, it was more complicated for compliance because we have to submit for every single process, even if they are already approved at North Salt Lake. So that's where we stand with these. So the gummies, the vapes, and the concentrated liquid squeeze product, again, have been made, they've been approved for quite a while. SOPs are working, and it's just an approval for doing it in a different facility. Same equipment.”

- **Deputy Commissioner Amber Brown opened Medical Cannabis Production Establishment Board Questions;**

Q. Brad Winter: “So to reiterate that, you're seeking the approval now, but you may not actually start producing these products until the decision's made, is that correct?”

A. Tryke Processing: “Likely, it's more likely that we will be moving forward with Tooele, the question will be, will we continue to do it at North Salt Lake?”

Q. Dr. Edward Walker: “Just have a quick question for Cody. And that is, we have inspection resources or inspection resources to be able to understand the processes of both locations.”

A. Cody James: “Yes. Correct.”

A. Tryke Processing: “And they are exactly the same processes. Same SOPs just in two places, yeah.”

- **Deputy Commissioner Amber Brown opened Public Comments; Public Comments were closed**

- **Miles Maynes moves to approve the Medical Cannabis Change Request for Tryke Processing**
 - **Motion Seconded - Brad Winter**
 - **All Present - YES**

Medical Cannabis Change Request Approval: Beehive Gardens

Cody James Introduces Beehive Gardens: “Beehive Gardens is one of our eight licensed cultivators here in the state. Currently they're located in Weber County. Right now Beehive has sent in a request for a second location out in Tooele County. Statutory language says to fund that a cannabis cultivation facility may operate at two addresses under a single license. That's under 2014C. And then in 2042F1, the department may authorize a cannabis cultivation facility to operate at no more than two separate locations. And if the department does authorize multiple locations under this section, the two cannabis cultivation facility locations combined may not exceed the cultivation limitations. They're either four acres outdoors, the 100,000 square feet or the combination of the two. As far as the amount of biomass that this could change for Beehive or for this year and for maybe next year and what those current square footages are as well as, or as current one is now and what the future may hold. I think that the

licensee should discuss that with the board there, but those are the things that also the board should take into consideration when allowing or when taking this under advisement. So again, it's just. the amount that's going to be produced this year, next year, and then the current square footage."

Beehive Gardens States: "This is Bijan Sakaki with Beehive Farmacy. I apologize, I normally love coming to these in person, but circumstances, I couldn't attend this one in person. Thank you, Board and Cody, for the opportunity to speak. This is a change request for us to expand our footprint. We'd like to cultivate additional biomass for not only wholesale, freshly frozen material for additional processors to help aid some issues in the marketplace with processors having viable product to make products with. And then also so that we could have a different price point of products as well. Since we will be producing the product rather than purchasing it from a third party. It will allow a cheaper price point for production. Right now we've identified a location which we've submitted this change request for. I have to go through the local jurisdictions and use a conditional use and land zoning permitting. If that for some reason doesn't work we've already identified a secondary location with very comparable footprints and if that we do cross that bridge I would obviously contact you to submit a change request there but the intent here is just to expand. Technically since this will be a greenhouse it would fall under the indoor footprint because it would have use of supplemental lighting LED lighting in the greenhouse and the proposed usage is 13,000 square feet of greenhouse. We intend to phase into that as demand beats it so each greenhouse is 3,250 square feet which would produce just shy of a thousand pounds of material per month. So as we stagger and grow with the market we would obviously turn on additional greenhouses as the structure is already there so it would allow for a relatively quick time to market for our processors to be able to purchase additional material. And I'm happy to answer any questions on process or location if you guys have. Thank you."

- **Deputy Commissioner Amber Brown opened Medical Cannabis Production Establishment Board Questions;**

Q. Deputy Commissioner Amber Brown: "How long until you anticipate getting to the 13,000 square feet?"

A. Beehive Gardens: "That would be, to be honest with you, driven by the demand. I do not want to overproduce. Our initial approach would be to turn on the first greenhouse, get that going, turn on the second greenhouse, get that going, and with those two it'll allow us to stagger production. So unless there are drastic increases in processors or patient demand, we would just grow with the rate of the market but we would want the approval for the whole {unintelligible}. So it would be market driven to be honest but I feel comfortable with operating the two greenhouses internally."

Q. Deputy Commissioner Amber Brown: "And can you clarify for the board what you're currently cultivating and how many things are in the space?"

A. Beehive Gardens: "Absolutely. We're producing about 600 pounds of finished flower out of Beaver County facility on average of about 50 per month. There's additional biomass with that trim, waste, etc. A majority of that flower goes to just finished flower. So this is a different use of material. It's not going to finish flower. It's going to go strictly to freshly frozen extraction, utilizing genetics that are intended to be extracted. What we're currently operating in Weber County is a different process and a different end product. So we hope to bridge that gap with the greenhouses."

Q. Miles Maynes: "So just looking at some projected numbers, I'm estimating that you have just one greenhouse come online within the next 12 months. You're estimating 1,000 pounds of biomass for processing into cartridges, pens, and edibles, non-edible medication. Is that correct?"

A. Beehive Gardens: "That is correct, and that'll all be dictated based on the processors that purchased it. I don't know if it's all going to go to a vape pen or it's going to go into various finished forms. That'll all be processor determined. Because I don't have a processing license, so we would just be, our processing license is a Tier 2, so we can only have flower. So we would be selling this to Pure Plan, Pure Utah, Wasatch, Boojum, the independent processors."

- **Deputy Commissioner Amber Brown opened Public Comments; Public Comments were closed**

- **Miles Maynes moves to approve the Medical Cannabis Change Request for Beehive Gardens**

- **Motion Seconded - Dr. Edward Walker**
- **All Present - YES**

Medical Cannabis Change Request Approval: Beehive Farmacy

Cody James Introduces Beehive Farmacy: "Beehive Farmacy has requested to relocate their Brigham City Pharmacy to Draper City here in Salt Lake County. There's probably a lot of things to be talked about and questions here, but let me just do a rundown of the things that need to be met as far as statutory language that is in the statute right now under 441A201.18 they have to be able to show that the, you know, how this move is beneficial in regards to the medical cannabis availability, quality, and variety, as well as whether the geographic dispersal amongst all the licensees of the pharmacy is sufficient to reasonably maximize access to the largest number of medical cannabis car holders and then see the extent to which the pharmacy can increase efficiency and reduce the cost to patients of medical cannabis. It also goes in to say that the factors listed in 441A104.7

need to be met, and those are that the person asking for the change, gauging, should submit a strategic plan for opening the cannabis pharmacy, including gauging appropriate timing based on the supply of medical cannabis and medical cannabis products and consultation with the Department of Agriculture, as well as the quantity and condition of population of medical cannabis card holders in consultation with the Department of Health and Human Services. I'll go out and say that the Department of Agriculture feels that there was not a consultation with us as far as the supply of cannabis and products, and we did check with the Department of Health and Human Services today, and they don't have a record of any discussions about the quantity and condition of the population of medical cannabis card holders. There was no consultation there. As far as the other three I mentioned which is medical cannabis availability, quality and variety, the geographic dispersal, and the extent to how this will increase efficiency and reduce cost to patients I would say that the licensee needs to clarify why this move is possibly better than the current location."

Beehive Farmacy States: "Thank you you guys and as much as I would prefer to do this in person I appreciate the ability to do this online. I have always been transparent with all people in the program operators, legislators, regulators. I do feel like there are more patients in Draper. However, we love Brigham City, the intent here is to not leave Brigham City patients abandoned, or without a pharmacy. To be frank, a lot of this came from our recognizing there have been other pharmacies moving into the area, from additional areas. And we looked into the legislation, there was nothing prohibiting pharmacies from doing such. I had several pharmacies reach out to me during this independent pharmacy process. And while Brigham City is not a medically underserved region, as defined by the HRSA, or a governor's exception, if this pharmacy move were approved, Brigham City would be an underserved area from the medical cannabis program perspective. So this is not a hard line in the sand where we're wanting to move from Brigham City to Draper City. Obviously, the location we found already has an existing business that would need to relocate. So there would be, you know, at least a nine month implementation program, implementation timeline, if something were to get approved. But what we're looking for is the ability to move there. If there are additional licenses that could potentially backfill the Brigham City, knowing that we can move to Brigham City, and then moving there, you know, the intent is there. But you know, we as a company also have to do what's best for Beehive. But we also have to do what's best for the patients. And if there is, you know, if there is legislative concern, or there is, you know, patient concern, then I would obviously go through this process again and rescind that. So this isn't necessarily a hard line in the sand saying, you know, Beehive Brigham City is moving. We love that. We love the pharmacy, we love our staff, we love our community, the intent is to see if this allows additional market place for more pay additions in that area and if somebody were able to fill the Brigham City location, amazing. So kind of a long-winded clarifying statement but if anybody has any additional follow-up please feel free."

- **Commissioner Kelly Pehrson opened Medical Cannabis Production Establishment Board Questions;**

Q. Brad Winter: "Is there another pharmacy up in the Brigham City area like about north of Ogden?"

A. Cody James: "No, you've got one in Ogden and then you've got this one in Brigham City then you've got one in Logan."

Q. Commissioner Kelly Pehrson: "It is probably an underserved area of Brigham City. The next pharmacy license- it doesn't- there's no guarantee that it would go to Brigham, correct?"

A. Cody James: "Right, right, yeah. I'm not sure I can go into the locations that we're putting the application there, but yeah, because there's multiple ones and we haven't got to that point within the board, there's, yeah, there's no guarantee that, you know."

Dr. Brandon Forsythe States: "I'd like to remind the board that we do need to assess this application for movement from the current state of the market as it is now, not with the projections of the new pharmacy opening up at some point. I think it's important to realize, though, that that argument really doesn't hold a lot of weight. These two new pharmacies are intended to be in rural areas of Utah to improve patient access. Doing this would effectively move a new pharmacy into Salt Lake Valley rather than providing you access circumventing the intent of those two additional pharmacy licenses stated by the legislature. I also have a prepared statement to share with the board on this matter. The location of each medical cannabis pharmacy is of great importance to the department because it ensures a robust medical cannabis program here in the state. Access to quality medical cannabis is of utmost importance to Utah's patients. So when considering the initial location or relocation of any pharmacy, we have to consider the following factors which are laid out in Utah Code Section 441A 201.1. Those factors are medical cannabis availability, the availability, quality, and variety of medical cannabis for cardholders, geographic dispersal, the sufficiency of geographic dispersal among licensees to maximize access for the largest number of medical cannabis patients or medical cannabis card holders and cost and efficiency, the extent to which the pharmacy can increase the efficiency and reduce cost to patients and licensing qualifications, the ability of a pharmacy to meet the qualifications outlined in the code. In analyzing the proposed move of the Beehive Farmacy in Brigham City to Draper, the department finds that this relocation would negatively impact the geographic dispersal of licenses. Of the 15 currently licensed pharmacies in the state, nearly one third are already located in Salt Lake Valley. Approving this move would increase that number to five and three additional pharmacies in Southern Davis County and Northern Utah County, leading to a concentration of two-thirds of the total number of pharmacies within these three counties. Such a shift would not only skew the geographical balance but also create a cluster of pharmacies in a region that is already well served. This poses significant drawbacks to the program including potential challenges in managing supply chain logistics and equitable access across the state. While Salt Lake Valley does have the largest number of patients, they already have four pharmacies in the valley and others within manageable driving distance. The continued placement of the pharmacy in Brigham City allows for 77% of the patient population to have a pharmacy within reasonable travel distance from their home. Allowing this move would significantly disrupt this access with little gain for the vast number of patients in Salt Lake and it would significantly decrease access for patients in northern counties. It would also set a precedent that could lead to other pharmacies in rural

regions attempting to move to more lucrative areas well for the group urban areas and we've already heard indications that other pharmacies are listening in on this and considering similar moves if this is approved. And these relocations would significantly disproportionately benefit patients residing in densely populated areas at the expense of patients in rural areas. The department is also known that the variety and availability of medical cannabis products are heavily influenced by the presence and distribution of licenses, and concentrating these pharmacies in a limited area would lead to reduced competition, potentially affecting the quality and pricing of other situations."

Miles Maynes States: "So I'll just state my opinion before we get started, but I don't feel like this board was intended to make this decision based on the medical cannabis production and pharmacy licensing board letter that was written by the medical cannabis production and pharmacy licensing board work group that we received back in May. It says, and this is signed by several legislators, Walt Brooks, Jennifer Dailey-Provost, Luz Escamilla, Derrin Owens, Evan Vickers, and Raymond Ward. In an attempt to clean up statutory provisions that were outdated and no longer applicable, the geographic region authorization language was inadvertently stripped, removing UDAF's direction to divide the state and no less than four geographic regions of the purpose for medical cannabis pharmacy licensing. It was not the intent of the sponsors of House Bill 54 to move the direction to UDAF to divide the state to no less than four geographic regions for the purpose of medical cannabis pharmacy licensing."

Q. Miles Maynes: "Okay, so that's my first state in my opinion, but I want to know, as we look at the map and the statistics that I pulled from the July 2025 Health and Human Services data report, 40% of all patients reside in Salt Lake. And then if you take Utah, Davis, and Weber and add that to the mix, that makes up a total of 80% of all patients in the state of Utah within those four counties. And beyond that, the 80% of all the product categories that are consumed by these patients fall into the category of cartridges, pens, and flower. My first question is, in your Box Elder location, what are the main product types sold?"

A. Beehive Farmacy: "So the majority of our products in Brigham City, the majority of them are going to be vape carts and gelatinous cubes edibles. We've noticed that that region sells less finished flower, vapeable flower, than in normal Salt Lake. So our Salt Lake location sells more flower. Brigham City particularly has more gelatinous cubes, topicals, tinctures, and vape carts. Where it's a little bit more inversely skewed, I think the demographics are a little bit older, and so you have more of a particular demographic that, you know, ingests their cannabis rather than vaporizing."

Beehive Farmacy States: "May I just open with, I don't disagree with any of Dr. Forsythe's comments or your comments, I do just want to remind everybody that all of the same statute was in place, a move from a pharmacy from Springville to Salt Lake City was approved. So if we're just looking to be treating all operators equally or treating the program without discrimination, I just want to remind everybody that same board approved the move from Springville to Salt Lake City."

Melissa Ure States: "To clarify there were significant changes to the statute made after that move that you referred to, which did put in the language, I believe that we are referring to, Utah Code 4-4-8-2-1.1-8, to talk specifically about the geographical dispersals which was not present at the time when that move was approved."

Q. Commissioner Kelly Pehrson: "Did that first move even come to the board?"

A. Melissa Ure: "It did not come to the board. It was not. That was not put in place. Which is why this new language that was there the first previous week wasn't taken to the board, because the board did not have the authority to do that. Hence this language was added with this specific language about the geographical disbursement and additional language there was also put in. So this language that we are discussing today that has to meet these qualifications was not put in place at that time."

Q. Dr. Edward Walker: "You mentioned, as did Melissa, that dispersal is a key word in that legislation. During the past year in our meetings here, we've heard a lot about various suppliers and pharmacies that will deliver throughout the state. I'm wondering does dispersal by definition mean that a pharmacy has to be located within a certain geographical area or the service for that delivery has to be covered in that area? It seems like there could be, you know, maybe no physical pharmacy but still have access via delivery."

A. Dr. Brandon Forsythe: "That's a possibility. You haven't interpreted the statute that way just because not everyone is comfortable with the delivery and the location of those pharmacies were made a specific point in {unintelligible}."

A. Beehive Farmacy: "Just to make a personal statement as a pharmacist, we're seeing some rural areas all over the country, including our state, where mail order and delivery mechanisms do provide access. But in my personal opinion, and certainly many, sometimes that does limit service, when you don't have access to a physical location for many patients that may have lower health or technological literacy rates."

A. Cody James: "To kind of add on to Dr. Forsythe's mention about the the statute. So reading the statute exactly whether it says geographic dispersal among the licensees. I think the department has read that as where those licensees are located; of those 15. And there's other wording for that 15th license a couple years ago that put them in certain areas there and, as well as, these two that we're going to be working on this year and next year for rural aspects of that. So I do think that the statute does kind of mention to that point of dispersing it and where, the thought is that the patients will be able to get there. Yeah, there's also as was mentioned in the letter that Miles read, from the legislative working group, that there is still mention in the statute about regions although that rulemaking authority for us went away and kind of has become the question there, but there is still that sense, to just answer your question, that there is a thought process that it is based on some geographic areas, you know, if you encompass the whole all of the language."

Q. Miles Maynes: "I noticed in your proposal you're basically asking to switch your current Salt Lake location to what would be a Draper location and then hold your Brigham City until more information comes about potentially a new licensee being awarded to an underserved or rural area and then potentially making that move in the future. Is my understanding correct?"

A. Beehive Farmacy: "No, the understanding would be to get the temporary approval to move Brigham City to Draper and by the time an additional independent, I know Dr. Forsythe I mentioned you can't use this in your prospecting of this, but if an additional pharmacy issue were licensed that would be approved and issued by after October 1, we would already be well, you know, this would be handled after that and if not then, you know, we would remain. And my intent here, I don't disagree with any of your comments, I think that unfortunately we have a legislative situation, that legislatively doesn't prevent anybody from from moving and if push comes to shove and we end up staying in Brigham City and we tighten up the the language then that's totally fine. We're happy to be participants in the program. So, Miles, here your initial question of it's Brigham going to Draper, Salt Lake remaining pharmacy license and going to Brigham and Brigham will backfill there and move to Draper."

Q. Miles Maynes: "The last thing I just wanted to do, this question reading over the code 441 a 1005 Section 2 it gives a series of criteria for the licensing board to evaluate locations for pharmacies, and a few that stick out to me is: positive connections to the local community. How do you feel like that would affect Box Elder County if this move was approved?"

A. Beehive Farmacy: "To be honest with you, again if I'm doing what I'm proposing, then, you know, we would make sure that there was a pharmacy in Brigham City before we left the patients underserved. So, I don't think it would be good for- I don't want to put on a politician's answer for you and say 'it's gonna be great'. It will hurt the patients of Box Elder County. You know, right now the only operator is an operator that has a store north and south of us. So, it's a very similar situation to Utah County where one operator would be the primary offering of that area. So, if, hypothetically, we're gonna move from Brigham City to Draper, we would have to ensure that we could still service those patients via delivery if there is no physical location there that we would still provide services for."

Q. Miles Maynes: "To what extent can the applicant increase efficiency and reduce the cost of medical cannabis for patients if this move was approved?"

A. Beehive Farmacy: "So right now there's, you know, it's no secret that everybody is competing for similar sales and similar patients. So, if this license were to move, there would be additional sales generated from the higher density of patients population, which would alleviate the amount of pressure required as business owners to pay back capital, events, and truck, and there is more free cash flow then that would become more efficient. You could have cheaper offerings."

Q. Dr. Edward Walker: "So, Cody, could you explain to us now this exact application? From what I understand and what Miles has read, there's an application for Beehive to move into Draper with a new pharmacy. I need clarification, for me personally, to vote on this. Is it their intent to keep their pharmacy going until such time as other services are available and have two pharmacies in operation at the same time? Or is this an application to shut down Brigham City and open up Draper?"

A. Cody James: "Yeah, so the change request is to move. And it needs to be said, for your question, that Beehive Farmacy has two locations already. They have one in Salt Lake County, and then they have this one in Brigham City. The change request is to move their Brigham City location to Draper. They wouldn't be able to keep that going at the same time. There was a secondary piece of paperwork that came to you guys, and it should be in your folder, about where they mentioned their Salt Lake thing, but to be clear, that this change request is for their Brigham City pharmacy to move to there. So, to answer your question shortly, is that they are saying to shut down operations in Brigham City at some point and then open up operations in Draper?"

Q. Brad Winter: "And in their application, there's the contractual obligation to wait for another pharmacy."

A. Cody James: "Correct."

Q. Dr. Edward Walker: "So our options as a board today are either to approve the move of Brigham City to Draper, or not."

A. Cody James: "Yes. Part of the list that I read out before is there's a strategic plan for opening that, that's supposed to have been done with consultation with both us, the Department of Agriculture and DHHS or Department of Health and Human Services. And that's the paper that I'm talking about that they had submitted as part of their information about some options. But yeah, to your point, really the thought that what you guys what the board is looking at is the movement of a pharmacy from one location to another."

Q. Miles Maynes: "If we don't feel like it was intended for us to make the decision can we abstain from the vote as a board member?"

Q. Dr. Edward Walker: "In this case, if we're going to abstain it would be a no vote because no action can be taken."

Q. Dr. Edward Walker: "Perhaps I could offer one more question. And that is, we have been, in the last legislative session, given permission to approve things for a certain period of time or to put people on a probationary period. Could that possibly be extended, in this case, to say we're not necessarily opposed to a new Draper facility, but not at the expense of Brigham City? And in a negative vote, I would hate to say, no, we don't ever want you to come back again and ask for Draper. But the intent could be, at this point in time, we feel it's not right, but later you can come to us and apply rather than waiting the whole year or two to apply."

A. Melissa Ure: "There is no reason that they could not reapply if the board says no at this time."

Q. Commissioner Kelly Pehrson: “Can you clarify, Miles, why you feel like this board can't make that decision?”

A. Miles Maynes: “My reference is to this legislative intent. It was not the intent of the sponsors of House Bill 54, Rep. Dailey-Provost and Senator Vickers, to remove the direction to the UDAF to apply no less than 4 geographic regions for the purpose of medical cannabis pharmacy licensing.”

Q. Deputy Commissioner Amber Brown: “So, Miles, so you're saying because the legislature has expressed that it was not their intent to remove the region, then you're saying from that that the board should not be voting on this?”

A. Miles Maynes: “Yeah.”

A. Deputy Commissioner Amber Brown: “Because I think the legislature has expressed their intent, we have some legislators that can comment, but the board's authority to vote on an application to move locations has not changed. There's just an inconsistency in the statute as to whether the board can require someone to stay in the region or not.”

A. Melissa Ure: “No, I would go so far as to say actually the statute does say the board has the ability to vote on the relocation very explicitly. So yeah, what the legislature is saying is that they're not their intent.”

A. Brad Winter: “That was my interpretation that what they're clarifying they do indeed want a regional consideration in our decision and that we have the power to do it.”

Q. Miles Maynes: “So, basically we had this thing that happened last fall. We had a license that moved and then rules were written that will keep, basically, that from happening again. And now we're dealing with that consequence. And what's the rule? So, I thought that the rule that was written was in order to basically just keep that from being available or on the table for everyone. But now I'm being told that the board was always intended to make that decision. Or did it push that decision?”

A. Melissa Ure: “The board is the deciding maker on whether or not the pharmacies can move. That is clear by statute. What you are able to take into consideration on the movement of the pharmacies and what you have to consider. Whether it needs to be in those geographic regions is what the legislature is talking about. But additionally, there is no question about this. This is statutory. There's no question. Geographical dispersal, is in the statute and is something you have to consider when you consider a movement of the pharmacies. Section 4-41A-201.18 is your authority to consider it. There is no question about that.”

Q. Dr. Edward Walker: “Procedurally for us as a board, one of the issues with this seems to be tiny. Evidently there is interest in establishing more pharmacies in the Brigham City area. Is our timing off on this? Is it within our purview to table a decision until the next meeting and then revisit it again when, potentially, UDAF may evaluate other applications for this area, if some are approved, it could certainly change the tenor of our decision.”

A. Cody James: “My answer being, and you know, council could correct me if I'm wrong, but I think that the intention for the application process for these two new pharmacies and especially the one that we're working on right now is to keep the two aspects separate, right? As the board decides who to possibly give the license to, for this independent rural pharmacy, is based on the best location within the state and the best operator and a lot of things, they're not just because someone has moved. So, in my mind, I understand what you're saying Dr. Walker about the timing, but overall I think that the hope is that we keep the two completely separate.”

A. Dr. Brandon Forsythe: “Brigham City is not a medically underserved area and would not be considered a valid place for the independent rural pharmacy license.”

Q. Brad Winter: “If we were to table this application review at next possible time, could we as a board request information regarding a more descriptive analysis of the current state of pharmacies, applications, population and distribution? Because I think that might help my evaluation of this situation better.”

Q. Dr. Edward Walker: “One of the things in our last meeting was asking for a map of the area and with those locations and we could review that.”

A. Cody James: “Yes.”

- **Commissioner Kelly Pehrson opened Public Comments;**

Evan Vickers Comments: “It's really interesting to listen to the discussion and first I want to say thank you to the board for being willing to participate in this program. It's not been easy. I've been involved in this from the very start and it seems like there's always a challenge and, also, I want to apologize, because it really is kind of us that mess this up. We have myself and Representative Dailey-Provost online here, and we were the sponsors of the bill and I guess it just shows nobody's perfect including legislators and legislative attorneys. We inadvertently did take some language out that's kind of messed up the region's concept and, you know, we've tried from the very first to provide access to patients across all of the state, they're not just in a centralized area along the Wasatch Front. And so the opportunity for Beehive to even make the application, I have no qualms with the fact that they probably would like to move to an area that they could possibly be more profitable in. So they're looking for that opportunity. From a management perspective, we try to use the region so that we can have patient access across the state. And delivery just doesn't cut it. Miles mentioned that, as far as in traditional pharmacy, where it does help supplement, but it doesn't really completely satisfy the need for the patient. So just to kind of bring you up to date a little bit, when we realized fairly quickly, you mentioned a matter that was not in the

working group, we recognized pretty quickly that there had been an error in the drafting. And so we sent that letter out to try to indicate that the legislative intent was to keep it the way it was and try to preserve the region concept. Since then, we've had requests to the governor's office and to our legislative leadership in the House and the Senate. There will be a special session on the afternoon of September 15th. Right now, we're actually discussing items to go on that agenda. This is one that we've been trying to get on the agenda. In fact, I've been talking yesterday and today with both the House, Senate and the governor's office, and trying to get that on the agenda. We probably won't know until after tomorrow. That's when the Senate leadership and the House leadership meet with the governor's office to try to discuss those things. If it was to go on the special session, then intent would be to make a fairly easy fix and just put that language back in and to restore that language. So that's why I say I apologize. We've created this little bit of a fear with you, the discussion you've had to have about the agenda item. And like I said, a no ill will to the board, I get it. I mean, they see the opportunity and I don't blame them for trying to take that. But I did want to bring that up and let you know that at this time it's unknown whether that agenda item will be on the special session. If it's the option for us as legislators is to try to do it in the special session. And I suspect that would probably be the only special session there. But I think it would probably be the only one to correct it in the next year's general session. So anyway, hopefully that helps to kind of put a perspective where we're at and what our intent was and what we're trying to do to correct the area of error that we created for you. I know that Representative Dailey-Provost, who is the lead sponsor and the house sponsor of the bill, is online and ready to comment as well."

Jen Dailey-Provost Comments: "Hi, thanks so much for having us and I will echo Senator Vickers' apologies. It's always inevitable when we're trying to make changes in the statute that there are some unintended consequences. And I want to be clear, there's been some confusion about the removal of the regionality language. It is our understanding and our discussion with UDAF that the regionality still exists in rule and that inadvertently taking that out of the code in the effort to clean up code, this is what our legislative attorneys do when we have a piece of code open. They're really diligent about cleaning up old redundant language and this was language that was tied to the promulgation of the 15th license and it was taken out just because that license had been issued, and we didn't, you know, the intent was not to take that out and I want to point out the fact that if we have been really careful in working in the medical cannabis program when we're working on rulemaking authority to proactively state that we want certain rules to be changed or made differently or to be promulgated or to be taken out under there was no portion in this code in HB 54 that tasked UDAF with taking out the regionality and that language and so and there is another portion of code that still references the regions and we think that that's really important because as you know every license holder I've spoken to has said we're all in this to help patients and I fully understand that this is there are some market forces that are in play here everybody has a right to run a business and make a living and to make a profit but at the end of the day it is absolutely not our intent to move to continue to oversaturate the Wasatch Front further relative to all the areas outside the Wasatch Front with the intent of backfilling with one of two new licenses that have been promulgated. Those two new licenses that were created in HB 54 one that as Cody mentioned has applications have been received for already and will be issued by the end of this year and another one it was not those were not meant regionality notwithstanding because of I'm sorry not regionality but high needs area notwithstanding because as was stated Brigham City wouldn't even qualify for one of those new licenses because it's not Detroit it's not considered a designated high needs area those two new licenses were specifically created to add access to different areas in the state not to backfill areas that are currently available in the state. I do want to clarify the question that came up, this body, this licensing body absolutely has statutory authority, the only body that has statutory authority to make those decisions. And so I would caution against abstaining from that because you do actually have the authority and the responsibility to make this decision because there is no other entity in the state that has the statutory authority to do that. And so I just want to be mindful of the fact that any ambiguity comes with the mistake on the cleanup language in the code with regard to regionality not having nothing to do with who has authority to make those decisions. And so we hope that you know hopefully we can make sure that that is clear. And then the last thing that I just want to say is how much I appreciate you know and have the level of respect that I have for UDAP and their desire to you know to do their jobs with integrity and fidelity to the intent of our legislative work. I know that it is not always easy, it's not always straightforward, but everything from this process for issuing that new license to the rules that change, rulemaking authority that changes every session as we work on the very licensing process that you guys are conducting in this process and so I've been grateful that we've been able to have this conversation with our regulatory agencies between us as legislators and the regulatory body and I again apologize for the ambiguity and the confusion in removing that regionality, but the fact of the matter is there is a huge amount of our state that is not accessible in our medical program and we have an obligation and a commitment to making sure that our medical program is as strong as it possibly can be and I want everybody to keep that front of mind as these decisions are made because this really does come down to whether or not we have a medical program that's healthy enough to withstand a lot of adverse pressures in this space right now."

Q. Miles Maynes: "You mentioned a special session was on the table and potentially reintroducing this language back in. When was that supposed to happen?"

A. Evan Vickers: "So the special session will be the afternoon of September 15th. The reason that we're trying to get the call set up, it'll be a governor call special session and so we're trying to get the items identified is because the special session will actually be on the Monday of interim week and so it'll be before our committee meetings so typically any bill that goes on a special session we try to take it through the committee and since the special session will be before the September interim any bills that are going to be on that that special session call they're going to have to be heard in committee meeting during August interim week which is next week and so that's why the staff that are working with both the house and the senate, and the governor's office are trying to identify the items that will be on that special session this week. I'd like to say they're meeting tomorrow. I just got off the phone with, prior to this meeting, with our senate staff and they're meeting tomorrow with the governor and governor staff and the house staff to kind of get final count on what bills are going to be on there. This one may or may not. I'd like to say we've been making a hard push to get it on there but it hasn't been decided yet."

A. Jen Dailey-Provost: "And either way, this will be fixed in statute eventually. And so I think it's important to be present to the fact that if a decision were made that falls outside of the statutory guidance on regionality and then the law were to be changed, there's the possibility that the movement would still be in the process of being made when the statute changed, which complicates things even further."

Q. Brad Winter: "I might just say, just to our legislators, just to reiterate in my words to make sure I'm understanding right. It sounds like the intent of the legislature that voted on this law and thus the law is to maintain a regional presence to ensure access to physical pharmacies as best we can throughout our state."

A. Jen Dailey-Provost: "That's correct."

Q. Deputy Commissioner Amber Brown: "Can I get clarification from the legislators? Is it the legislature's intent to not allow a pharmacy to move outside of the region that is set by the Department of Rule?"

A. Jen Dailey-Provost: "Unless my intent in discussions with my colleagues was that if there was any move, that it would still have to qualify to fall within the regions that were set in code before the inadvertent change. So it would still have to meet off the threshold for accessibility and moving to an area that was high needs or underserved."

A. Evan Vickers: "And I would agree with that."

Desiree Hennessy Comments: "It's Desiree Hennessy with the Utah Patients Coalition, and I would just like to thank everybody for this discussion. I think it's been really good. I think that a lot of my concerns have already been talked about. I just have more of a specific concern when it comes to patients. I think you can realize that in the regions, the issue with the region is what's kind of gone wrong. And I think it's just good to remember that when we, like, Representative Jenny Provost mentioned, that when we take these pharmacies, we put them in a very intentional place and so patients would have access to intentional places throughout the state. And even though, if this pharmacy moves, they will serve patients no matter where they go, maybe even more, which is probably the reason, right? That leaves us just over 2,000 patients in the Brigham City area that now have to travel 40 minutes either way to get medication. Or they can go online if that is something that they do, but I do talk to a lot of patients that don't want to go online. So we're leaving these patients without access, which is why that {unintelligible}. And I have talked to Bijan. He's sympathetic. He loves the patients in Brigham City. This is a hard position for him as well, but I think that we have to stay focused on the patients that we're serving. These patients can't be left behind just because of a mistake or anything that was omitted on accident. I'm just asking what you guys oppose this move."

Jake Garn Comments: "My name is Jake Garn. Are we limiting the opening of all pharmacies in the state, or just pharmacies providing safe and effective plants? Because can there be a pharmacy that distributes amphetamines and opiates in both Draper and Brigham City?"

- **Brad Winter moves to deny the Medical Cannabis Change Request for Beehive Farmacy**
 - **Motion Seconded - Miles Maynes**
 - **All Present - YES**

Medical Cannabis Tier 1 Processing Application Renewal Approval: Life Elevated

Cody James Introduces Life Elevated: "So you should consider as the board for each cannabis processing facility seeking renewal, the information that they supply that includes methods and procedures for extraction, their standard operating procedures, and a complete listing of their medical dosage forms that they produce. Going on to Life Elevated, they are a Tier 1 Processor located in Utah County. I will let Justin talk to the board about the methods and procedures for extraction, his standard operating procedures, and a complete listing of the dosage forms that Life Elevated produces. But I do want to just let the board know that there were some incorrect aspects to their renewal application. First and foremost, it would be that in their application for renewal that they have a Hemp License. Life Elevated does not have a Hemp License at this time and have not since 12/31/2023. That being said, some clarification, that doesn't mean they have to have one to be a Medical Cannabis Processor, but that does need to be clarified. Secondly, through the department's review, there was a portion in their operating plan requirements under 44-41A203E that asked for processing techniques to be explained, which is the methods and procedures used to transform raw materials into finished products. We reached out a couple of times, so there are some things that we reached out for about that aspect, but overall I think that Justin can talk about the methods and procedures and again his SOPs as well as his dosage forms."

Life Elevated States: "My name is Justin Arriola. I am one of the managing partners for Life Elevated Processing. I just wanted to say we appreciate all the work that you guys are doing. You guys are considering a multitude of issues. I'd also like to say that, personally, I'd just like to thank the staff here for working with us on the renewal process. We did have some challenges with the online portal and having pieces of our application being uploaded and then going back in to modify things, having to come up and so on. That being said, let's talk directly about our processing techniques. Life Elevated Processing focuses mostly on CO2 extraction. So we actually run a fairly large scale Vitalis machine. One of the machines that Curaleaf is currently looking at putting in. We've been running that machine since 2018. We first started on the hemp side and then moved into the Tier 1 Processing side. Some of you have been to our facility and seen that machine run. I know Miles has been there. We've been there and obviously our staff has been there several times. It's a big machine. There is a lot of technical knowledge involved with it. But we truly do feel like it produces the

highest quality medicine, a very clean way to extract. We also focus on solventless processing. We do a water extraction technique, and those techniques are the student ISOPs. Specifically, we just try to focus on, we have a lot of variety of formulations. We do vape carts, gelatinous cubes. We do the disposable syringes, which are edible and also vapeable. We've done hash products. We also do tinctures and topicals. We do focus primarily on some of the lower volume items that are needed in the market. We focus very strongly on topicals, tinctures, syringe doses, and we incorporate CBD into our products that's also extracted in the same way that we extract our cannabis. To address the Hemp License piece, we originally intended to renew our license, and we are just working through that process. And so, that's why we marked that we were, you know, that we were planning on doing that because we like to focus on extraction for all the products that go to, or all of the biomass that goes into our products. So, we're going to take the time to do that with cannabis. It's provided by some of our growers. We're going to do the same with any products that we bring, our CBD-rich products. And typically, right now, there aren't too many growers that provide higher quality CBD-dominant cultivars in the market, and so we do feel like that's appropriate and important for us to provide because we do provide a lot of product formulations that incorporate the CBD and the THC along with CBG. So, those two cannabinoids primarily will come from the hemp market, and we don't use isolated products. A lot of producers that are in the market right now will buy isolated cannabinoids from the producer out of state and just have it shipped in, and so we just feel like we get a better quality product with that extraction. So, our intent is to, you know, on the Hemp License side, and we'll work with the department to get that corrected and rectified, but for right now, we should have marked that box, and we did try to do that, so."

- **Commissioner Kelly Pehrson opened Medical Cannabis Production Establishment Board Questions;**

Q. Miles Maynes : "Is it the same facility that is doing both licenses?"

A. Life Elevated: "Yes. It will be, but right now, we're currently not extracting any CBD. But we had CBD that we brought into the Tier 1 program through the hemp waste transfer, and then once we changed the hemp waste transfer program, we basically had to identify and provide those numbers to the department, saying, hey, this is the CBD that we have, and we're moving it into the hemp space, and so, right now, what we've got to form in it with will sustain our product and production, but we do intend to renew our hemp extraction and go after some additional CBD and CBD, or CBT-rich bio in the future."

Q. Miles Maynes: "And a lot of this compliance and improvement, do you give credit to your new leadership or no?"

A. Life Elevated: "Honestly, we've had some challenges over the last year, just because of staff and some of the market variables, and so, our production's been a little bit lower, but our team is very focused on making sure that we're very compliant, that our communication with the department got better, and, you know, there's always challenges with some of those variables, but we haven't had a lot of interactions with the state in a negative fashion and so I think we're learning how to, you know, better comply, better communicate with the department in order to make sure that we're operating the way that you guys used to."

- **Commissioner Kelly Pehrson opened Public Comments; Public Comments were closed**

- **Miles Maynes moves to approve the Medical Cannabis Tier 1 Processing Application Renewal for Life Elevated**

- **Motion Seconded - Chief Jason Williams**
- **All Present - YES**

Medical Cannabis Tier 2 Processing Application Renewal Approval: Beehive Brands

Cody James Introduces Beehive Brands: "As was just mentioned Beehive Brands is our only Tier 2 Processor in the state right now. They're located in Weber County, and as was mentioned in an earlier conversation, because they're Tier 2 Processor they do not complete any extraction processes there. It's just pretty much packaging and labeling of flower at that portion there. And again that would be the one thing that they do produce, is that package flower but Bijan can go into that. Because there's no extraction, things that the board should probably focus on: their standard operating procedures, and the dosage forms. Which again, will be limited. Beehive Brands being in Weber County up for renewal and turn it back to the board."

Beehive Brands States: "This is Bijan with Beehive again. As Cody mentioned, right now this allows us to co-locate package our flower on site. No major changes to our process or to our dosage or form factors. If we do decide to expand we would go through a change request, but right now it's just business is normal for us. So appreciate the opportunity."

- **Commissioner Kelly Pehrson opened Medical Cannabis Production Establishment Board Questions;**

Q. Miles Maynes: "Is this all in house processing?"

A. Beehive Brands: "Yes. We're not outsourcing flower from other people and repackaging it. This just allows us, from when we harvest and dry and cure, we can trim and then package and test it all in our facility. So it allows us to essentially have a finished good that we could sell to a retail store."

- **Commissioner Kelly Pehrson opened Public Comments; Public Comments were closed**
- **Miles Maynes moves to approve the Medical Cannabis Tier 2 Processing Application Renewal for Beehive Brands**
 - **Motion Seconded - Brad Winter**
 - **All Present - YES**

Medical Cannabis Pharmacy Application Renewal Approval: Curaleaf Lehi

Cody James Introduces Curaleaf Lehi: “A couple of things for the board to keep in mind as they're looking at renewals of pharmacies, is the pharmacy's willingness to have different products available, the quality of product they're selling to patients, and the variety that they have. Also the pharmacy's operating procedures and practices. Those are the main things, and we'll let Alan talk about those things there, but overall Curaleaf is an urban medical cannabis pharmacy so they're designated as urban, obviously with them being in Lehi. They offer not only in-store purchase, but also an online service as well as a delivery. So they are a licensed delivery pharmacy where they contract with MellyGo, one of our licensed couriers. Curaleaf is a vertically integrated licensee, so it's one of our licenses that actually grow, process, and have pharmacies to be able to sell at.”

Curaleaf Lehi States: “Alan Roth, Director of Compliance and National Initiatives for Curaleaf. We're very happy to be part of the program. I believe many of you were at the walk-through recently. I think quite a few were here. The Lehi pharmacy has been running well. Limited, I think, maybe in 2025, there was one letter of concern and that was just on a re-ruling of some marketing materials that had recently been accepted. Same with the next one for Provo. During the tour we could see that there's a wide variety of varied processor materials available at our store. We do carry a pretty wide array of other people's items and we look forward to continuing with the program.”

- **Commissioner Kelly Pehrson opened Medical Cannabis Production Establishment Board Questions;**

Q. Miles Maynes: “I noticed that you have four counties that you serve with MellyGo.”

A. Curaleaf Lehi: “Four?”

Q. Miles Maynes: “I have Salt Lake, Summit, Tooele, and Utah.”

A. Curaleaf Lehi: “Tooele?”

Q. Miles Maynes: “That's what I have as a courier.”

A. Curaleaf Lehi: “Yeah, that might be a MellyGo Ops Plan, but we are not, I don't believe currently, delivering to Tooele.”

Q. Miles Maynes: “Oh, okay, so a courier does not mean you are operating that service, you are just?”

A. Curaleaf Lehi: “Yes, we are not actually a licensed courier. We contract with the third party called MellyGo. They have the license, they supply their ops plan but we also supply an SOP showing how we prepare the orders for them. So currently, we are delivering from Provo, from Lehi. We're approved to deliver in Park City and we are awaiting approval for the Springville site which just opened this week, which will be closing down Pason, or closed down Pason.”

Q. Miles Maynes: “Okay, so that means four pharmacies?”

A. Curaleaf Lehi: “Four pharmacies, all approved for deliveries by MellyGo. Well, three now, it was four, now we're just waiting for MellyGo to finish her ops plan so that we can do deliveries from Springville. Four pharmacies, all approved for deliveries by MellyGo. Well, three now, it was four, now we're just waiting for MellyGo to finish her ops plan so that we can do deliveries from Springville.”

- **Commissioner Kelly Pehrson opened Public Comments; Public Comments were closed**
- **Dr. Edward Walker moves to approve the Medical Cannabis Pharmacy Application Renewal for Curaleaf Lehi**
 - **Motion Seconded - Brad Winter**
 - **All Present - YES**

Medical Cannabis Pharmacy Application Renewal Approval: Curaleaf Provo

Cody James Introduces Curaleaf Provo: “Not much more to add other than this pharmacy is in Provo, not Lehi. Again, it's still considered an urban pharmacy for us, and has been approved as a delivery pharmacy. And just to cut you off at the head there, Miles, it means that they're a contractor for MellyGo.”

Curaleaf Provo States: “Yeah, Alan Roth, Director of Compliance, Curaleaf. Pretty much the same situation in Provo. It's a well-run pharmacy, popular, and again, kind of the same wide array of products as all of our pharmacies do.”

- **Commissioner Kelly Pehrson opened Medical Cannabis Production Establishment Board Questions; Commissioner Kelly Pehrson closed Medical Cannabis Production Establishment Board Questions**

- **Commissioner Kelly Pehrson opened Public Comments; Public Comments were closed**

- **Chief Jason Williams moves to approve the Medical Cannabis Pharmacy Application Renewal for Curaleaf Provo**
 - **Motion Seconded - Dr. Edward Walker**
 - **All Present - YES**

- **Miles Maynes moves to adjourn the 08-13-2025 Medical Cannabis Production Establishment Board Meeting**
 - **All Present - YES**