

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, harvesting/cultivation 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 ORAMA 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 ORAMA request as the State may require.

Signed: Alyssa Sofferin

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

Date: December 1, 2025

