

## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#), Beehives Own LLC dba Beehive Farmacy (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):

Mostly sensitive security information relative to location and layout - security risk.

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:

**Beehive Farmacy believes that the information provided poses a security risk for its staff and its operations due to specific employee contact information, sops, security plan, and layouts. All sensitive information that may put the Business and its staff at risk if in public domain.**

Signed: \_\_\_\_\_



On behalf of (company): \_\_\_\_\_

**Beehives Own LLC dba Beehive Farmacy**

Date: **2.1.26**



## Utah Department of Agriculture and Food

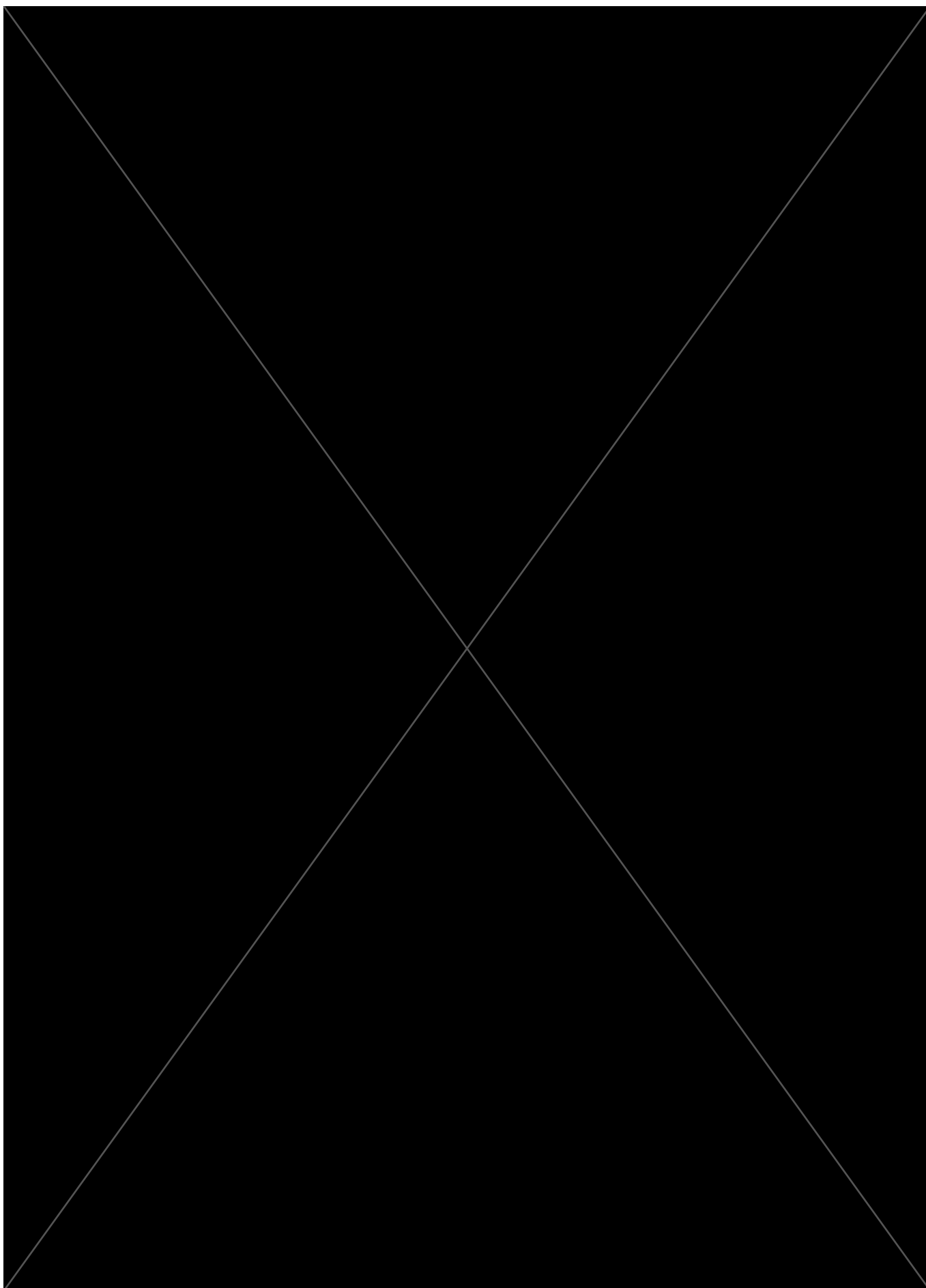
4315 S 2700 W  
Taylorsville,  
UT 84129

cannabis@utah.gov  
801-982-2375

### Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26-61a-304, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules. Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

#### Application type



19. Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.). 4-41a-1203, R66-5-9
<b>Employee Procedures</b>
20. Training Standards. R66-5-23, R66-5-26
21. Adequate staffing: PMP on duty, PIC assignments, reasonable ratio of agents to pharmacists, agent duties, supervision during deliveries, access while pharmacy closed. R66-5-5, R66-5-6
<b>Inventory Procedures</b>
22. Storage/ICS usage/product options. R66-5-8
23. Procedure to ensure correct labeling. 26B-4-201(23), 26B-4-201(39)(a)(ii), 4-41a-1101(8-9), 4-41a-1102(3)(a)(iv-vi), R66-5-5(3)(a), R66-5-7(7)(b)(ii)
24. Disposal Program>Returns process. 4-41a-1101(11), 4-41a-1205(3-4), R66-5-8(2), R66-5-9(2), R66-5-11
25. Procedure for product Recall. R66-5-12
<b>Sales Procedures</b>
26. Procedure to keep sales within the state or RMP dosage limit, standards for partial filling. 26B-4-231, R66-5-5
27. Procedure to prohibit sale of expired, misbranded, adulterated, opened product. R66-5-3(7), R66-5-10(4)
28. Procedure to enter LMP certifications. R66-5-22
29. How do you plan to meet requirements related to the patient information insert. What options are planned to be provided for patients. 26B-4-201(41), 4-41a-1101(12)(i)
<b>Change Requests (Renewal Only)</b>
30. Attach all approved change requests to the application R66-5-18
<b>Home Delivery (If Applicable)</b>
31. List and description of vehicles meeting appropriate standards. R66-6-3(3)(f), R66-6-3(6)
32. Location and description of where the vehicles are housed when not in use. 4-41a-1202(13), R66-6-3(3)(f), R66-6-3(8)
33. Procedure to maintain records of employees. 4-41a-1204(9), R66-6-3(3)(e)
34. Employee Training Standards. R66-6-7
35. Security Plan. 4-41a-1202(13)(d)
36. Storage plan that keeps product safe and sanitary. 4-41a-1202(13)(e), 4-41a-1205(3)(a)(i)
37. Procedure for creating/maintaining the manifest and trip log. 4-41a-404, R66-6-3(3)(g), R66-6-3(3)(i)
38. Procedure if items are missing. R66-6-3(9)
39. Return procedures. 4-41a-1205(3-4), R66-6-3(10)
<b>Delivery Procedures</b>
40. Payment has been made prior to delivery. 4-41a-1205 (2)(c)(iii)
41. Record keeping in ICS. R66-6-3(3)(b), R66-6-4(2)(a)
42. No person other than courier agent in vehicle. R66-6-3(3)(h), R66-6-4(2)(d)
43. Verify delivery is to the cardholder. R66-6-3(4)(a), R66-6-4(3)(a)
44. Only deliver during 6am-10pm. R66-6-3(4)(b), R66-6-4(3)(b)
45. Does not leave product unattended for more that 1 hour in vehicle. R66-6-3(4)(c), R66-6-4(3)(c)
46. Does not make changes to orders. R66-6-3(4)(d), R66-6-4(3)(d)
47. No product consumed. R66-6-3(4)(e), R66-6-4(3)(e)
48. Wear a name badge. R66-6-3(5)(a), R66-6-4(4)(a)
49. Provide PMP contact info and hours of availability. R66-6-3(5)(b), R66-6-4(4)(b)

## Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant 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.

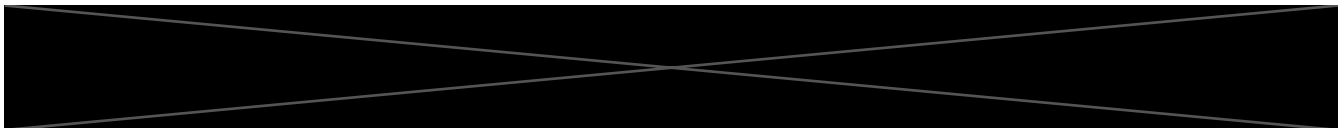
Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

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 agents 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.

Applicant 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 regard 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 they have read and understand 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.



Date Received:

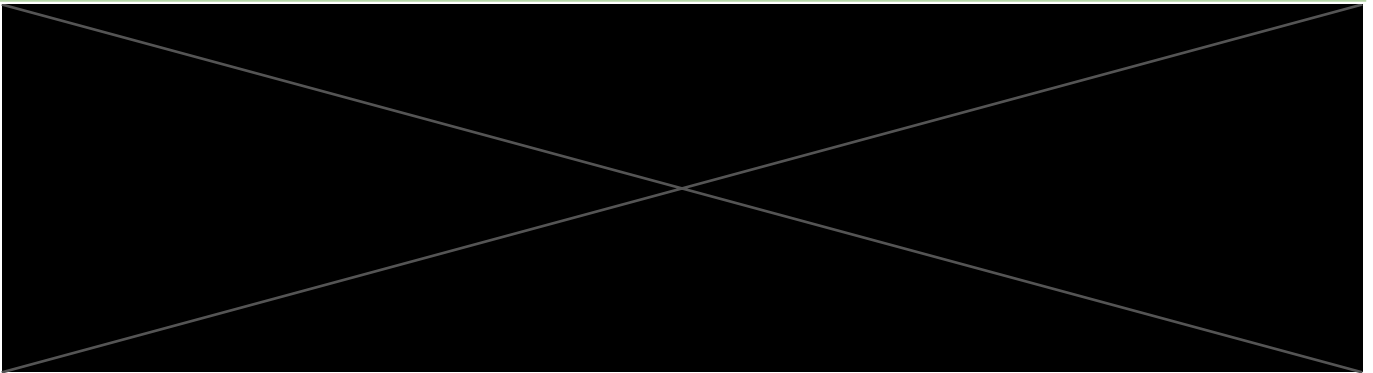
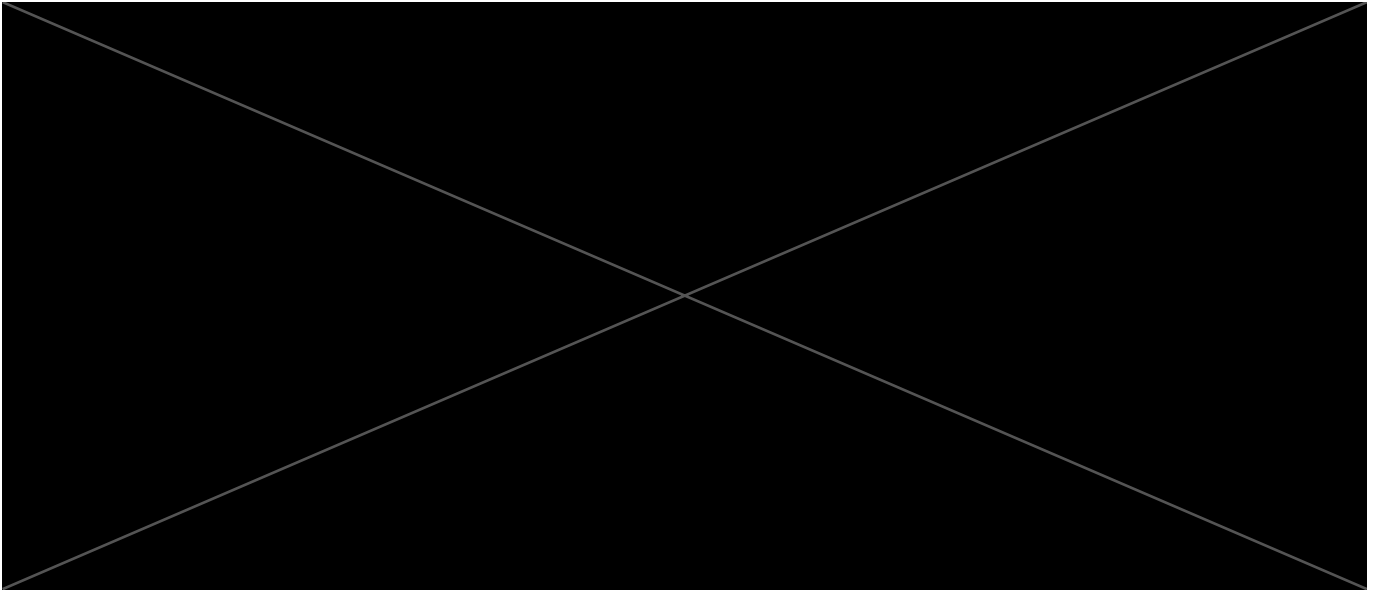
Date Approved:

Compliance Officer:



## Pharmacy Operation Change Request Form

Please limit change request form to one (1) request item and one (1) location. Please allow sufficient time for Department review and response. Additional information may be requested after submission. Ruling affiliated with changes made to Pharmacy can be found in: 4-41a-103, 4-41a-108, 4-41a-1001, 4-41a-1002, 4-41a-1004, 4-41a-1101, 4-41a-1104, R66-5-3, R66-5-4, R66-5-5, R66-5-7, R66-5-8, R66-5-9, R66-5-10, R66-5-11, R66-5-15 & R66-5-22



Submit a Change Request Application. Please attach **ALL** information from the checklist that will be affected.

- 1) Date changes should go into affect. Provide timeline or phases if applicable.
- 2) New/proposed address or facility contact information.
- 3) New building blueprint - Floor plan and cameras
- 4) SOPs/Protocols affected by the change in operating plan
- 5) Vehicle information as required in current ruling/codes
- 6) Credentials of new PIC
- 7) Submit new owner/Director background information - UDAF background authorization form, payment & fingerprints
- 8) Submit new business license from city
- 9) Updated bond
- 10) Educational material - Agent or patient targeted
- 11) Any supporting documents for the change request



State of Utah

SPENCER J. COX  
*Governor*

DEIDRE M. HENDERSON  
*Lieutenant Governor*

## Department of Health & Human Services

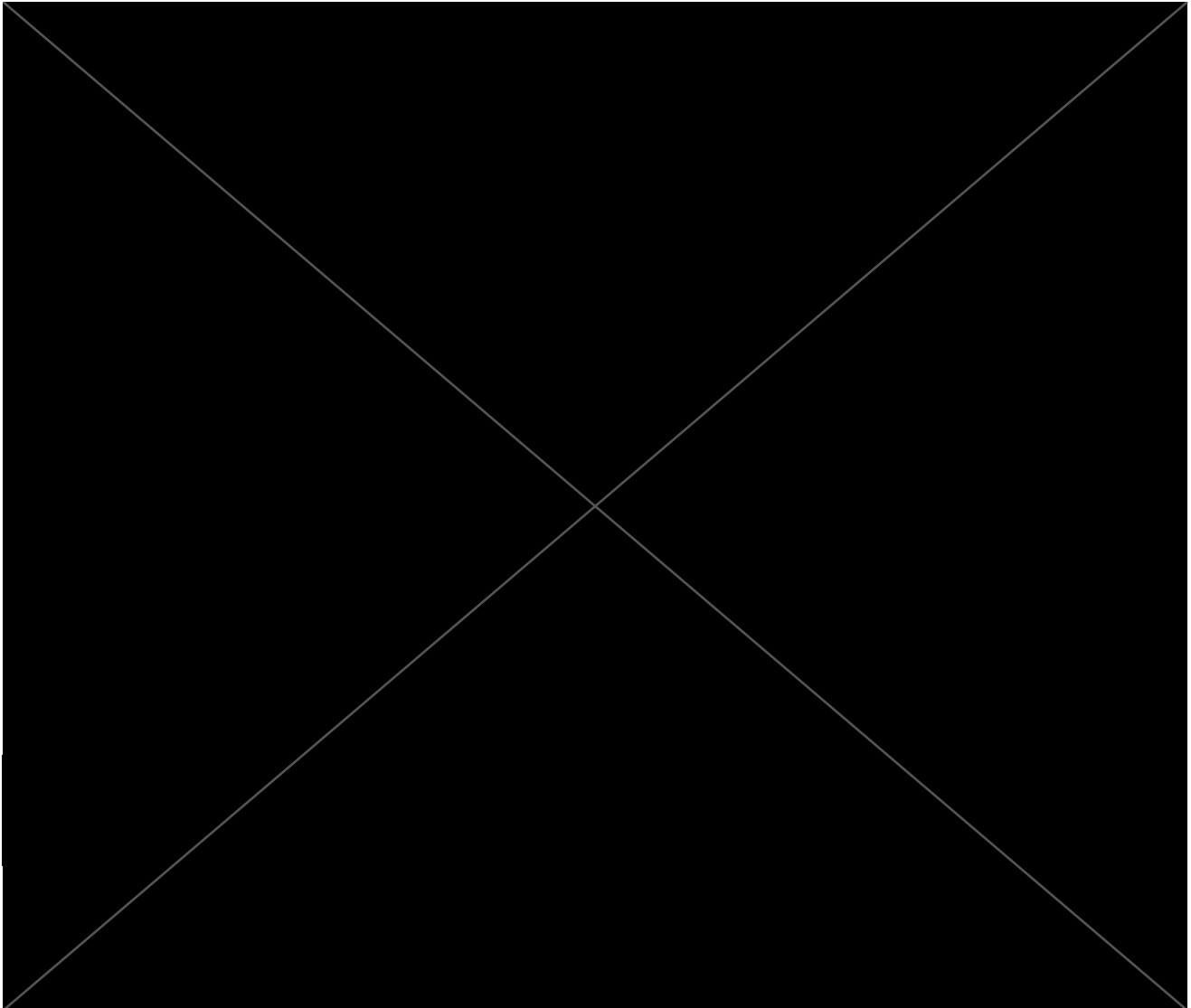
TRACY S. GRUBER  
*Executive Director*

STACEY BANK, MD  
*Executive Medical Director*

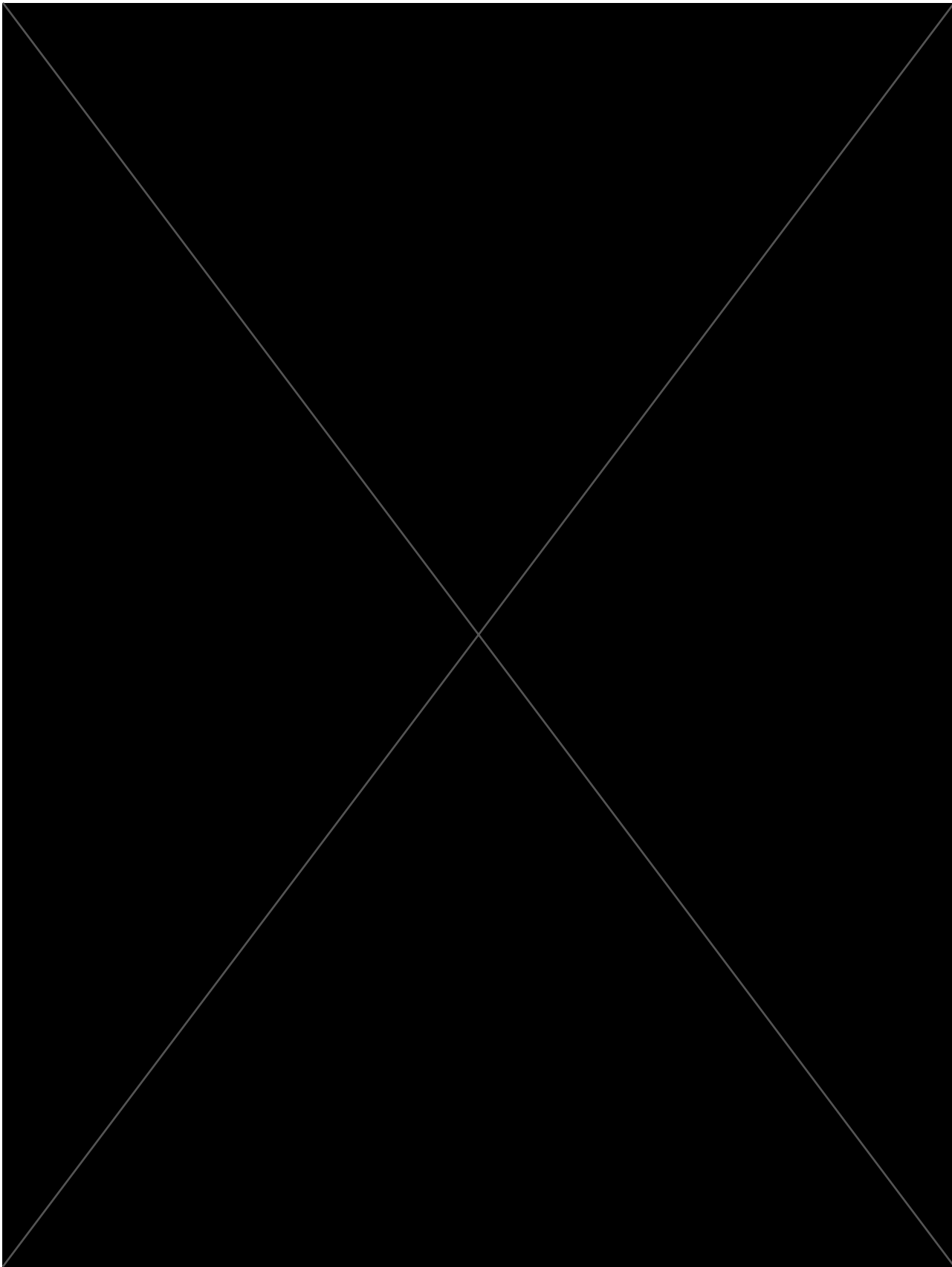
TONYA HALES  
*Deputy Director*

DAVID LITVACK  
*Deputy Director*

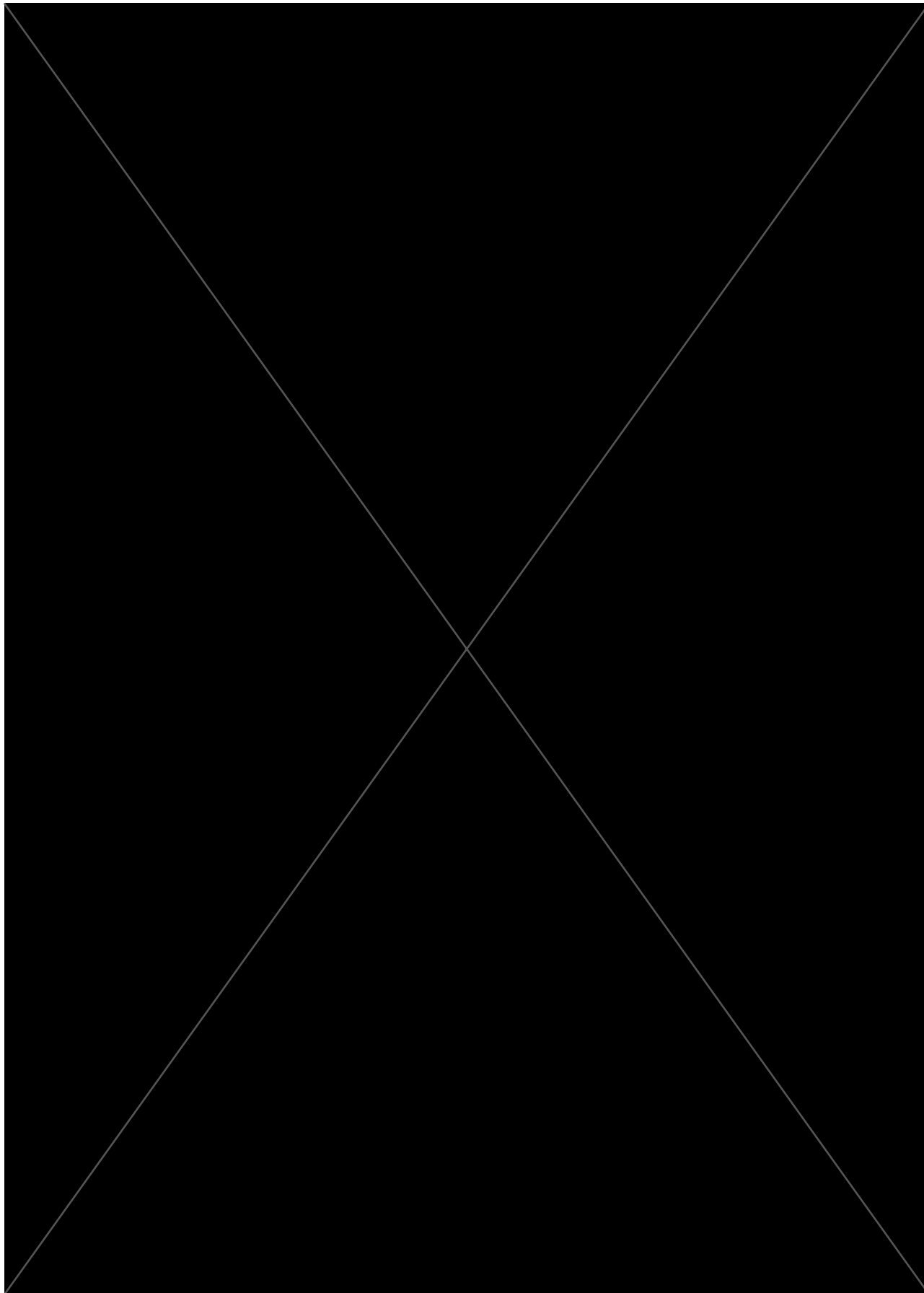
NATE WINTERS  
*Deputy Director*

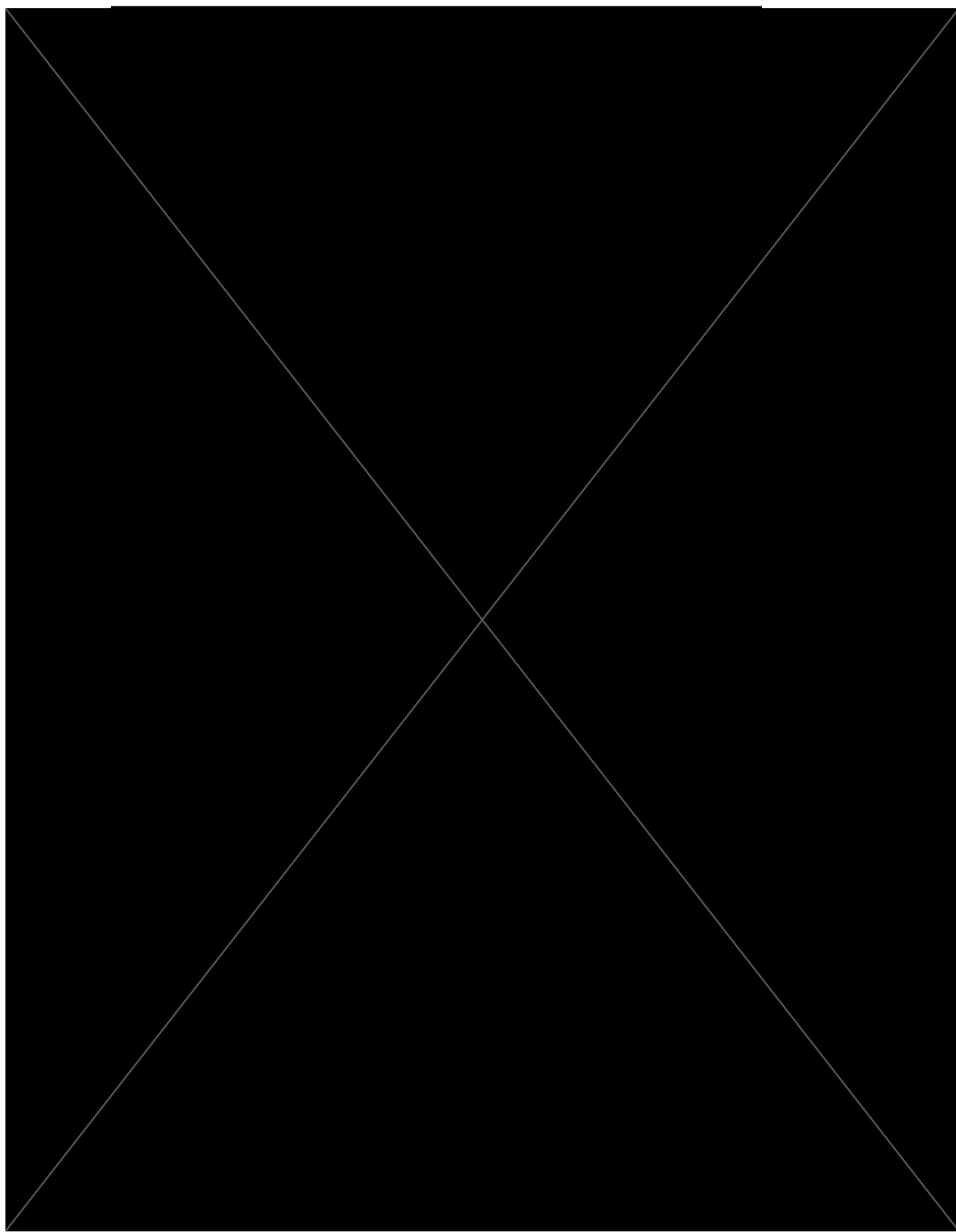


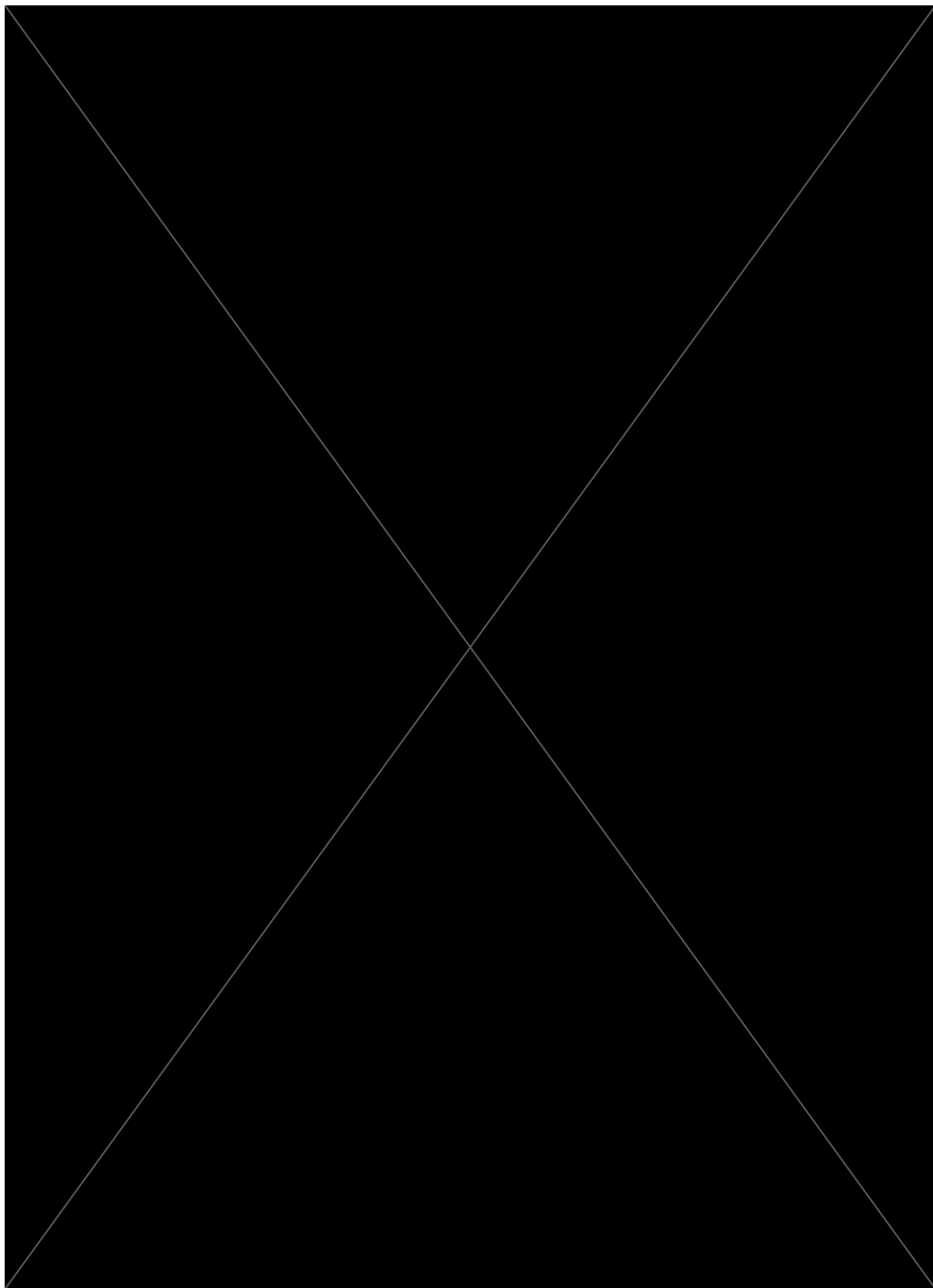
CREDENTIALS

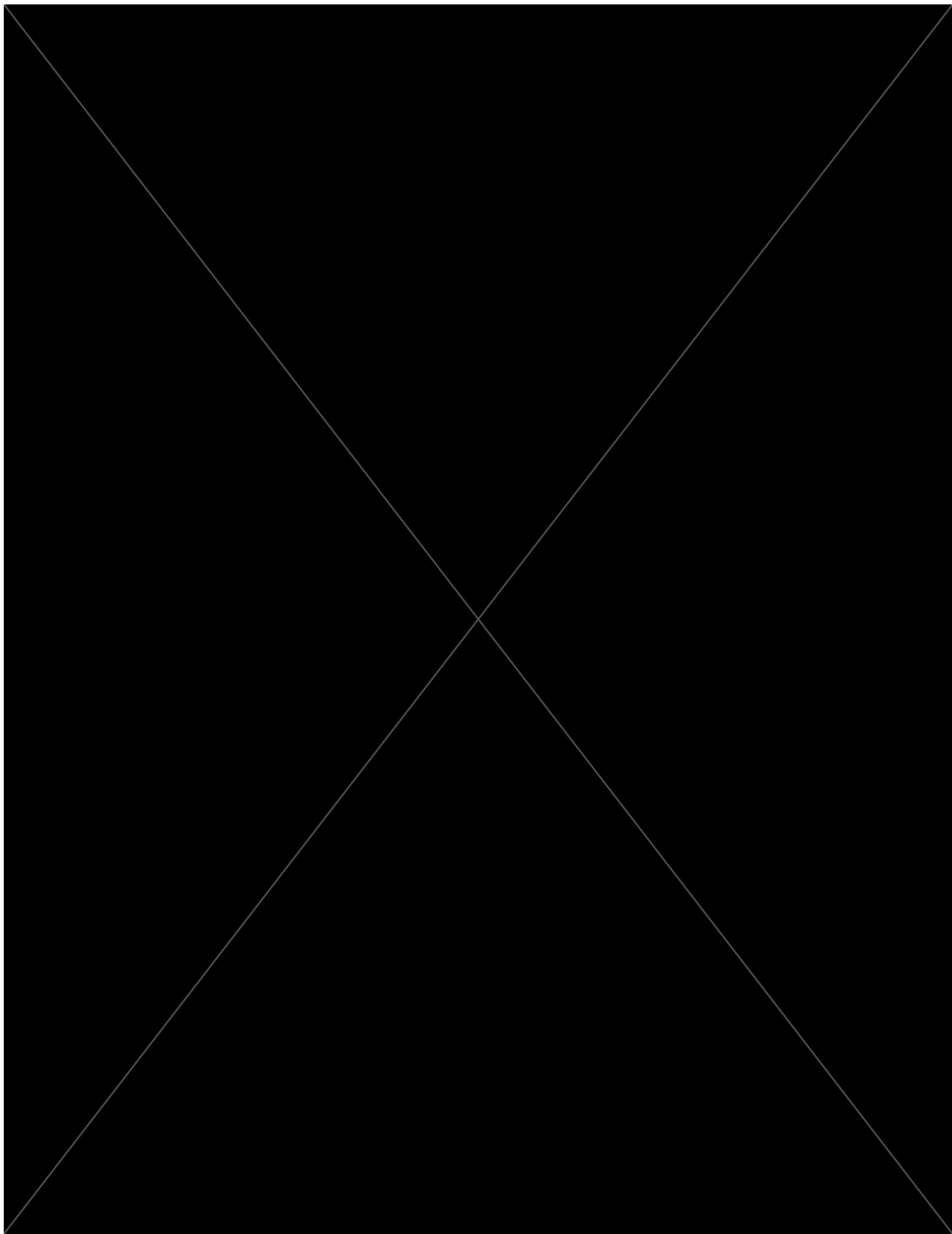


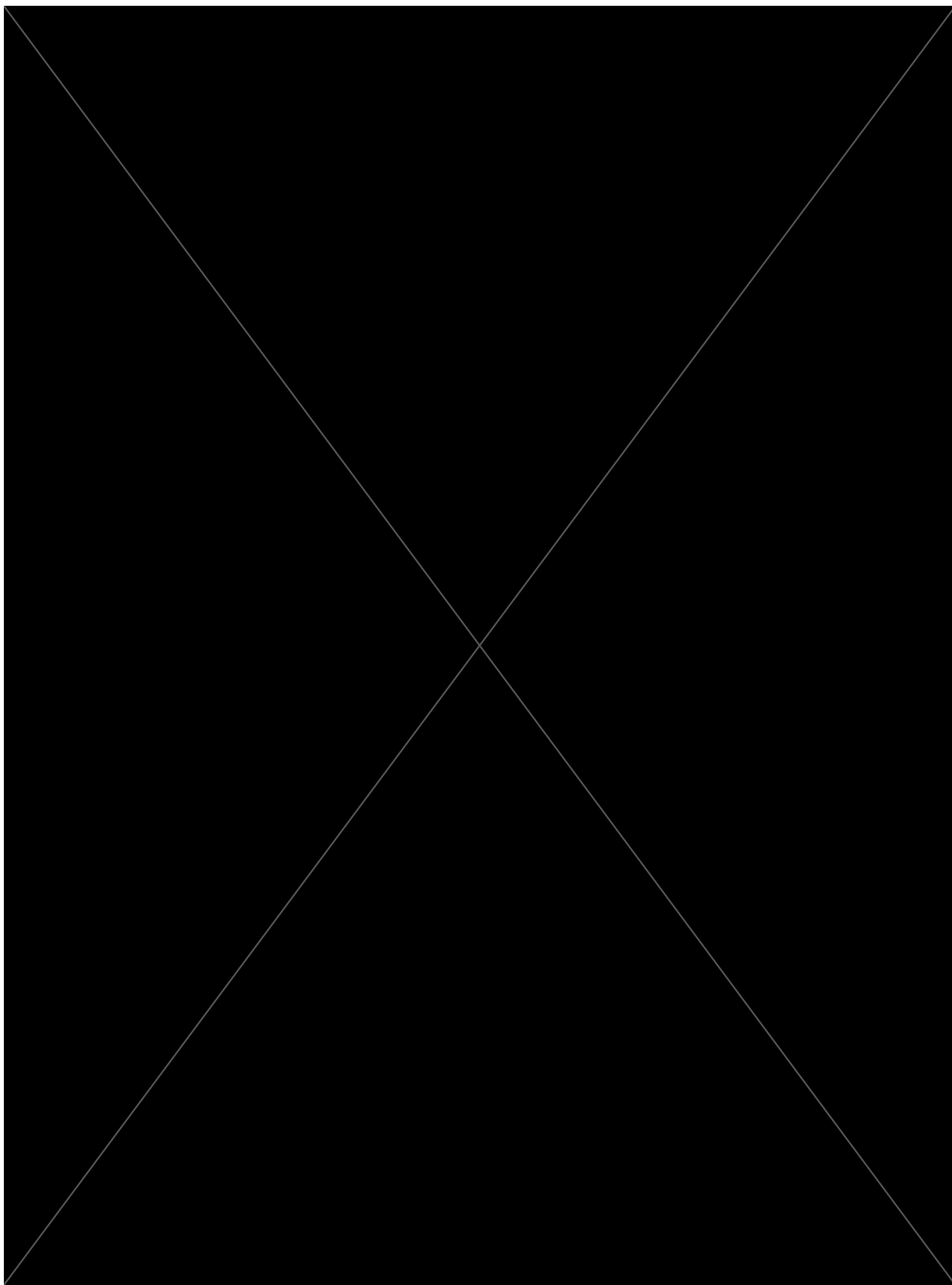


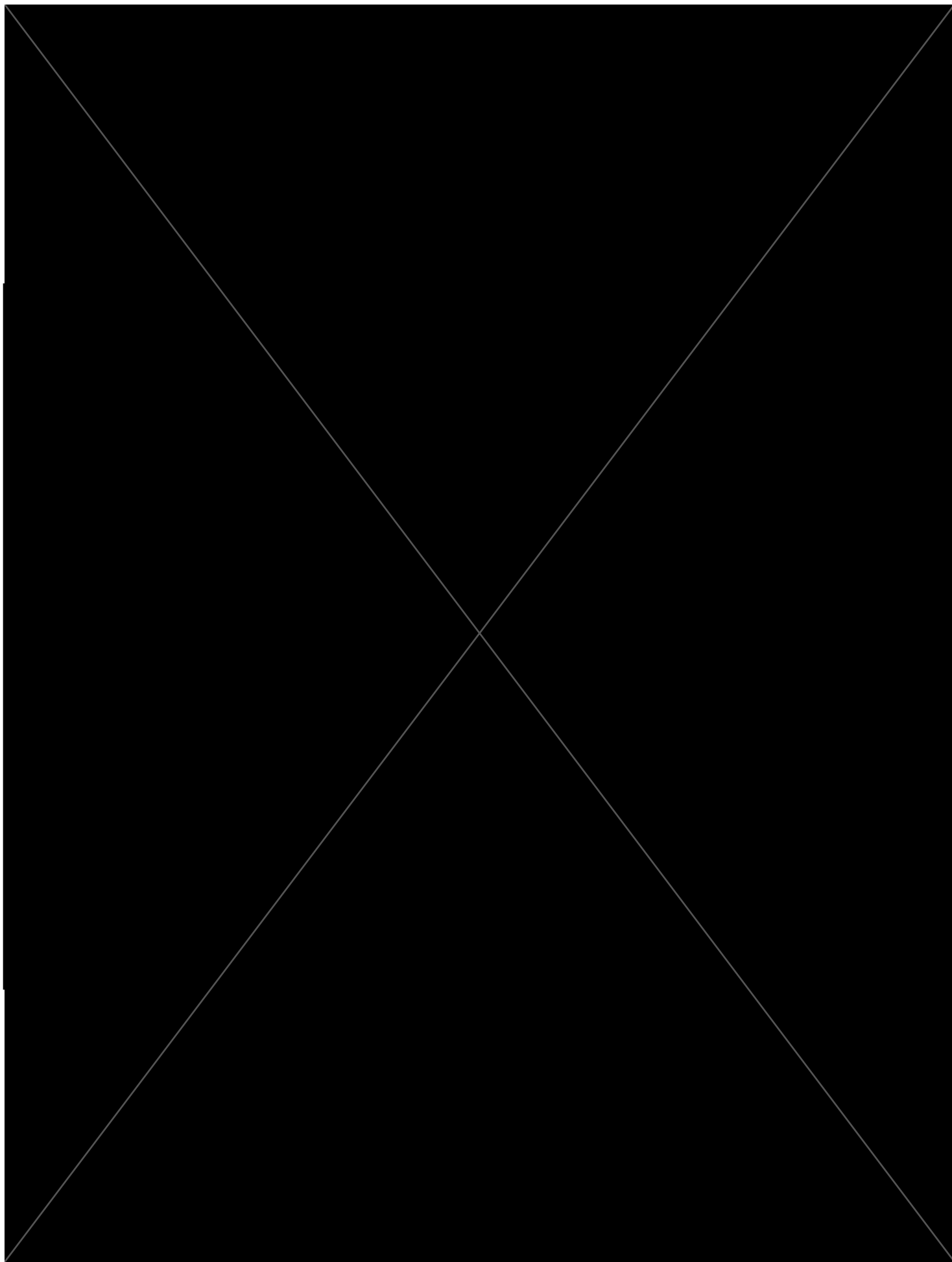


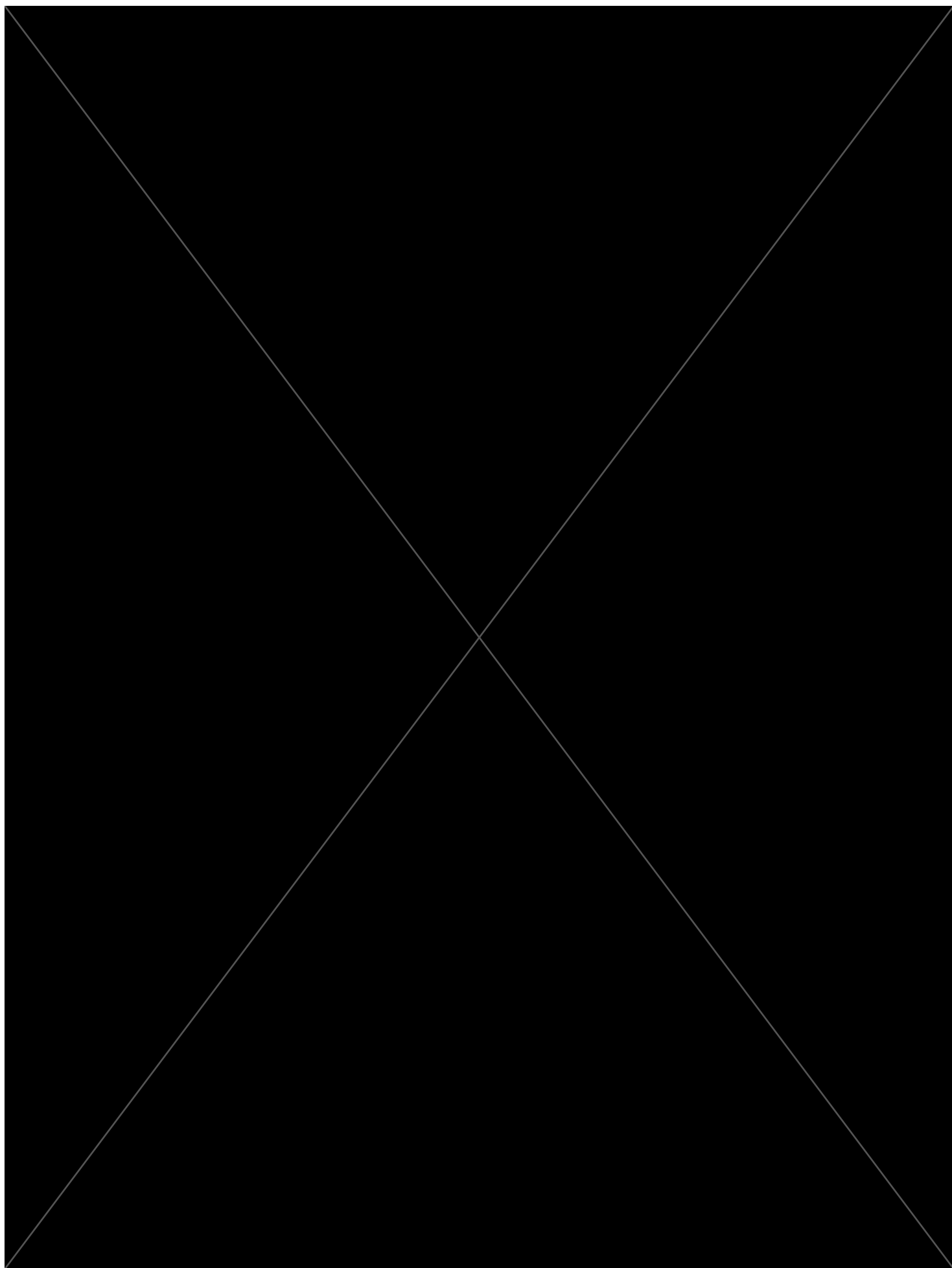


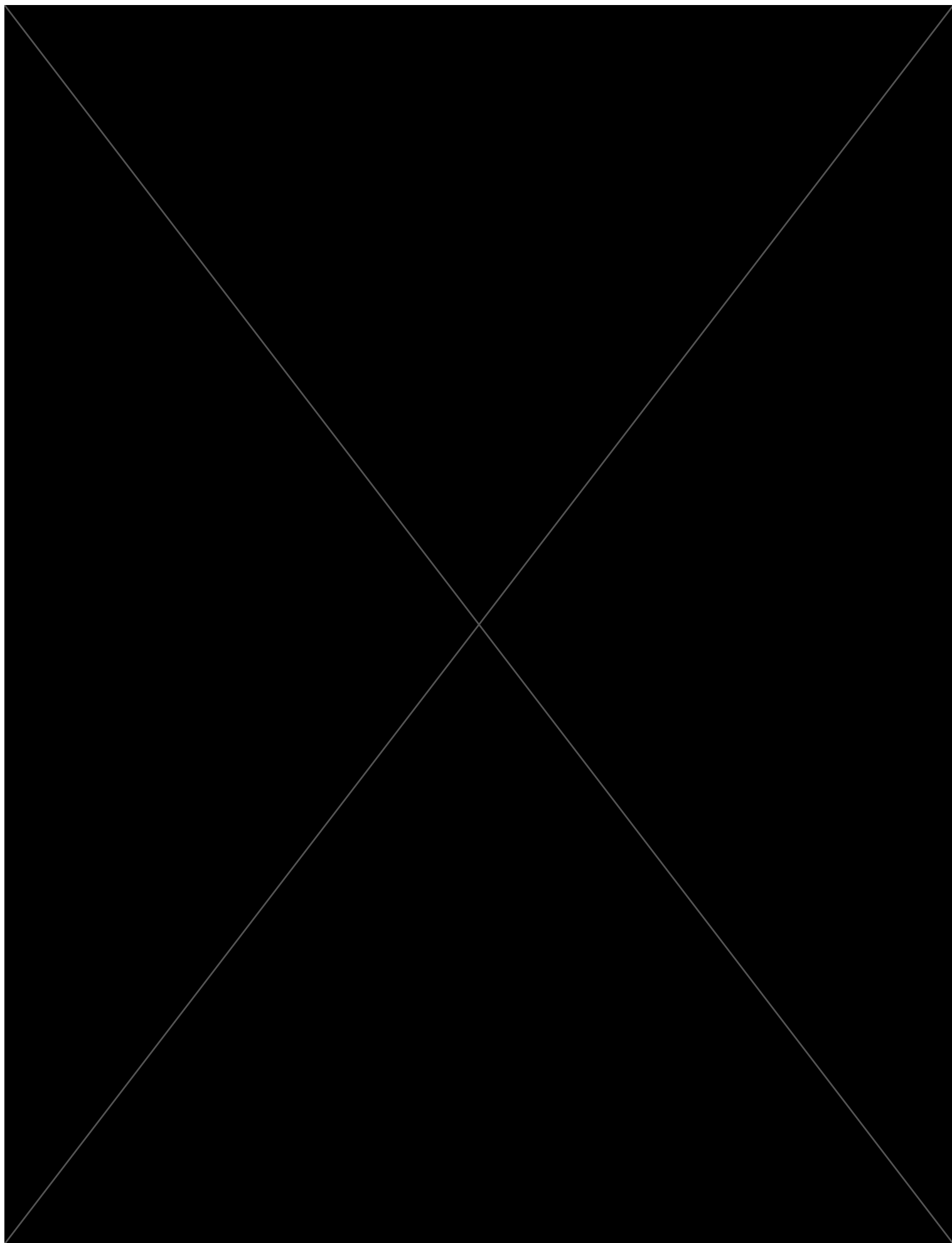




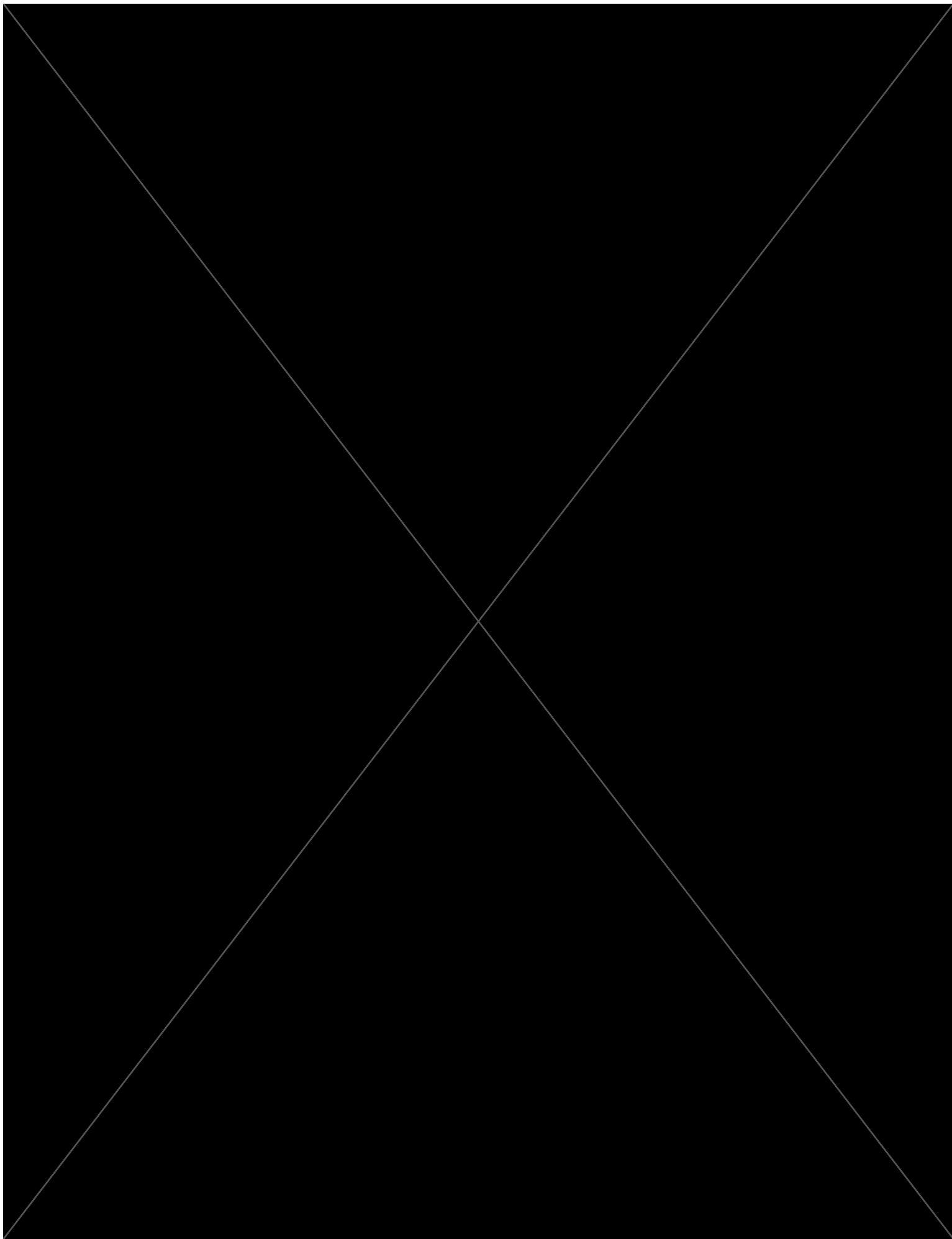


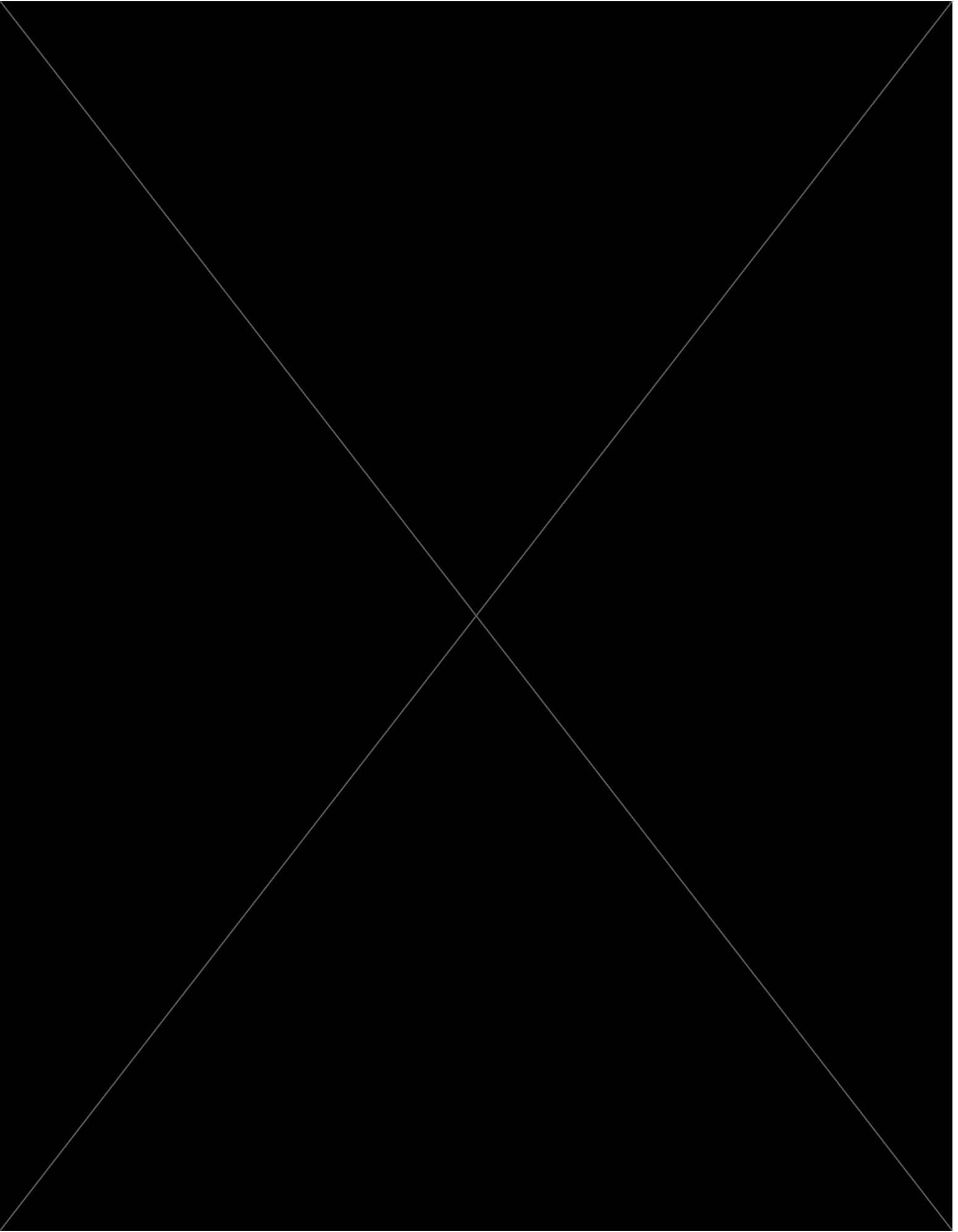


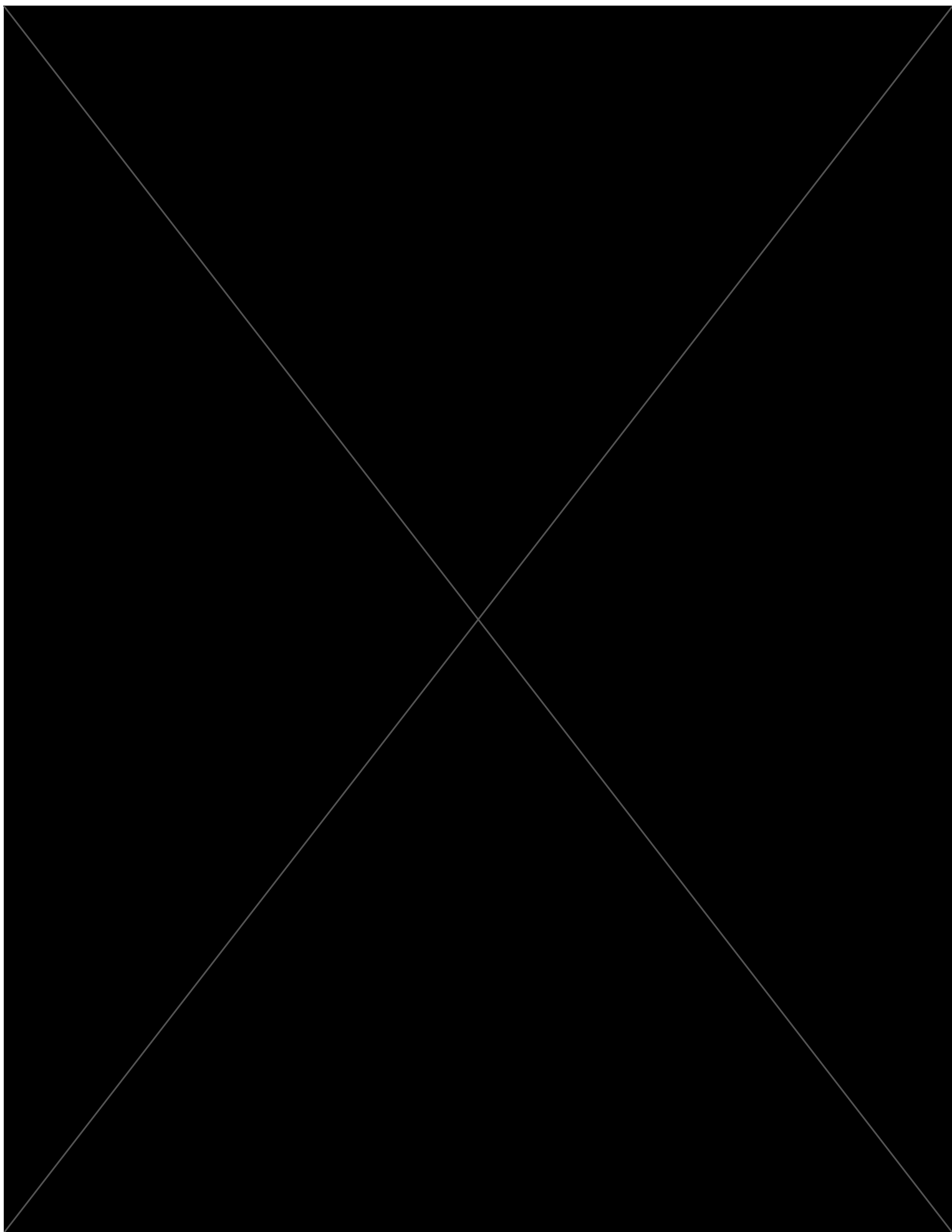


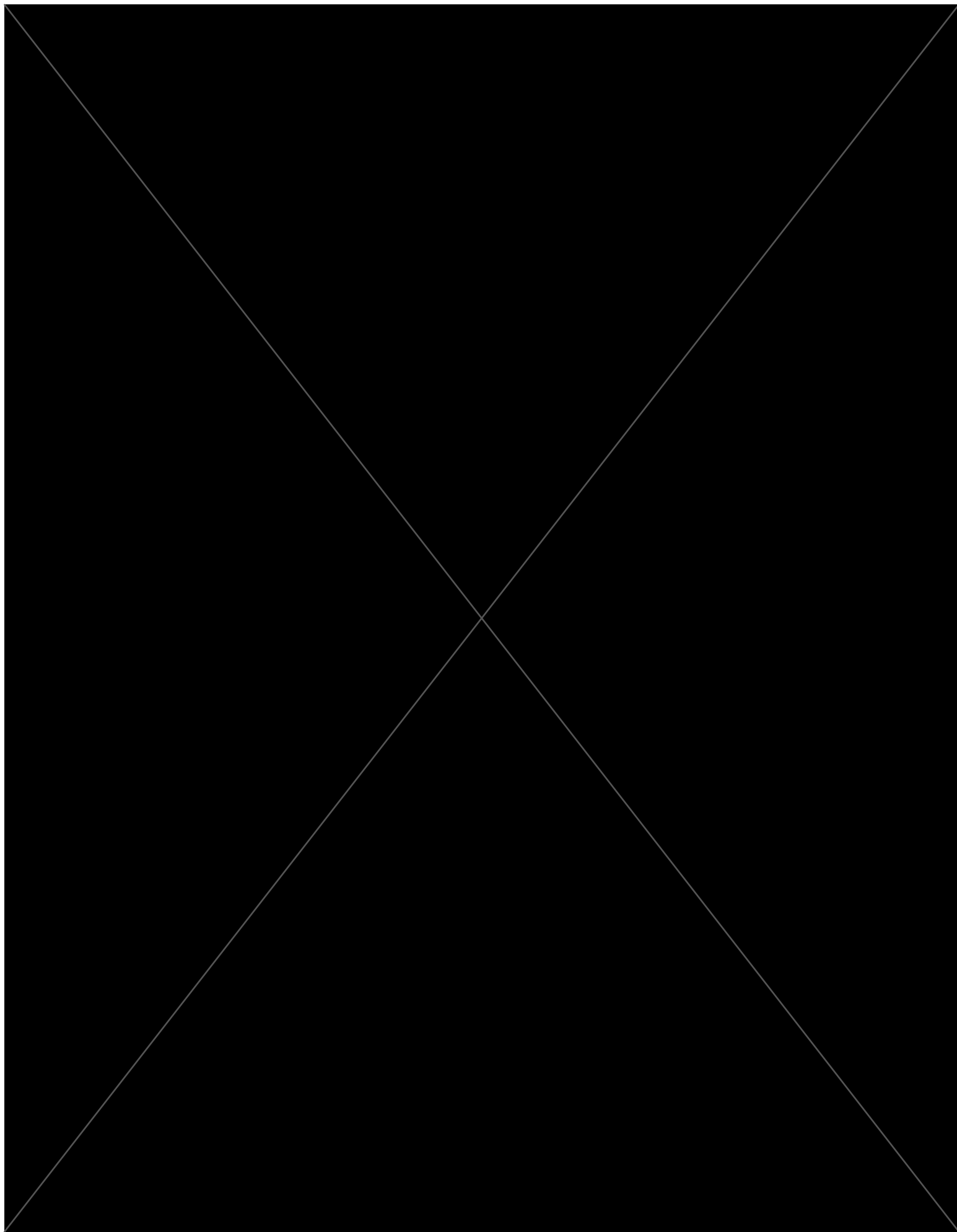


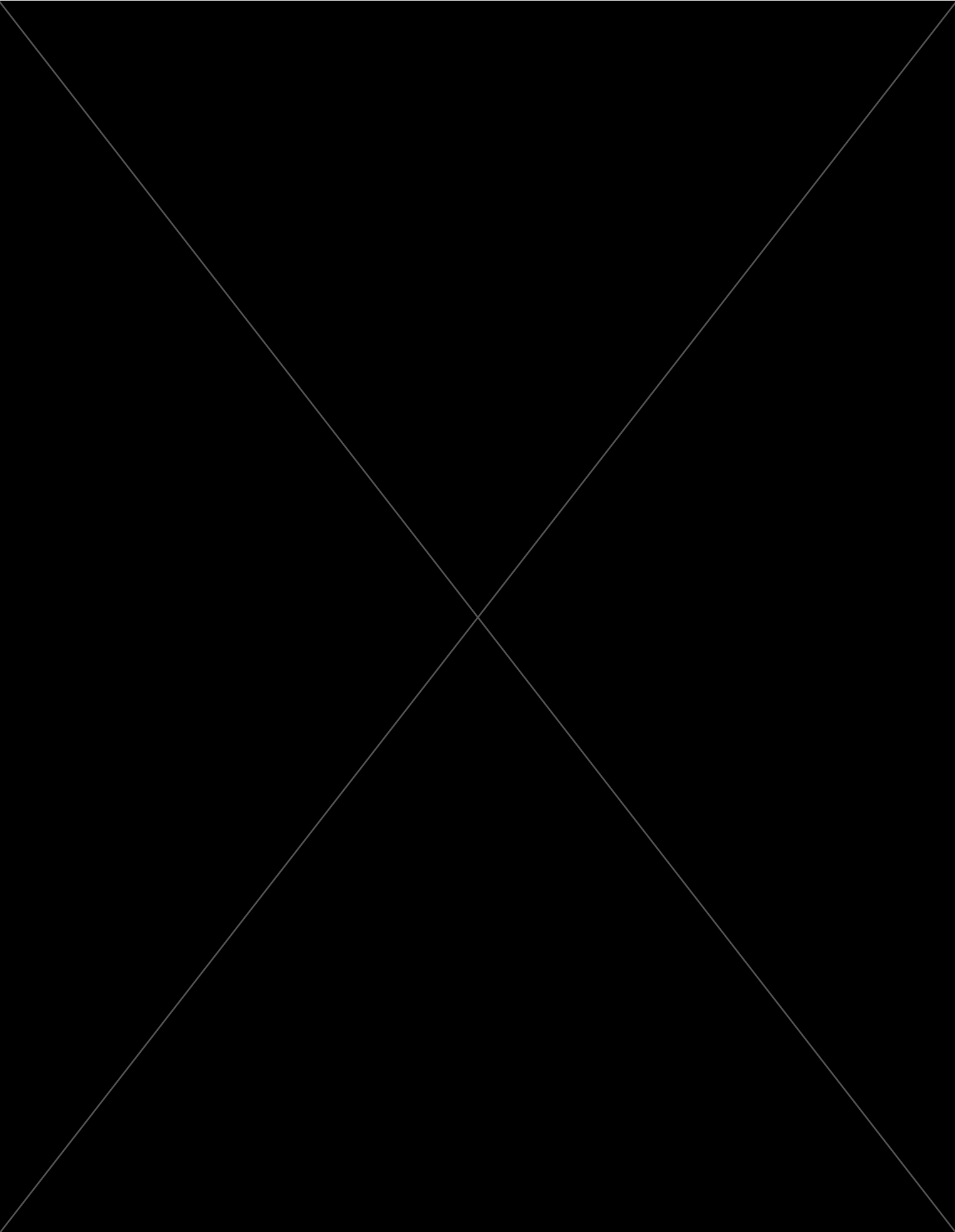


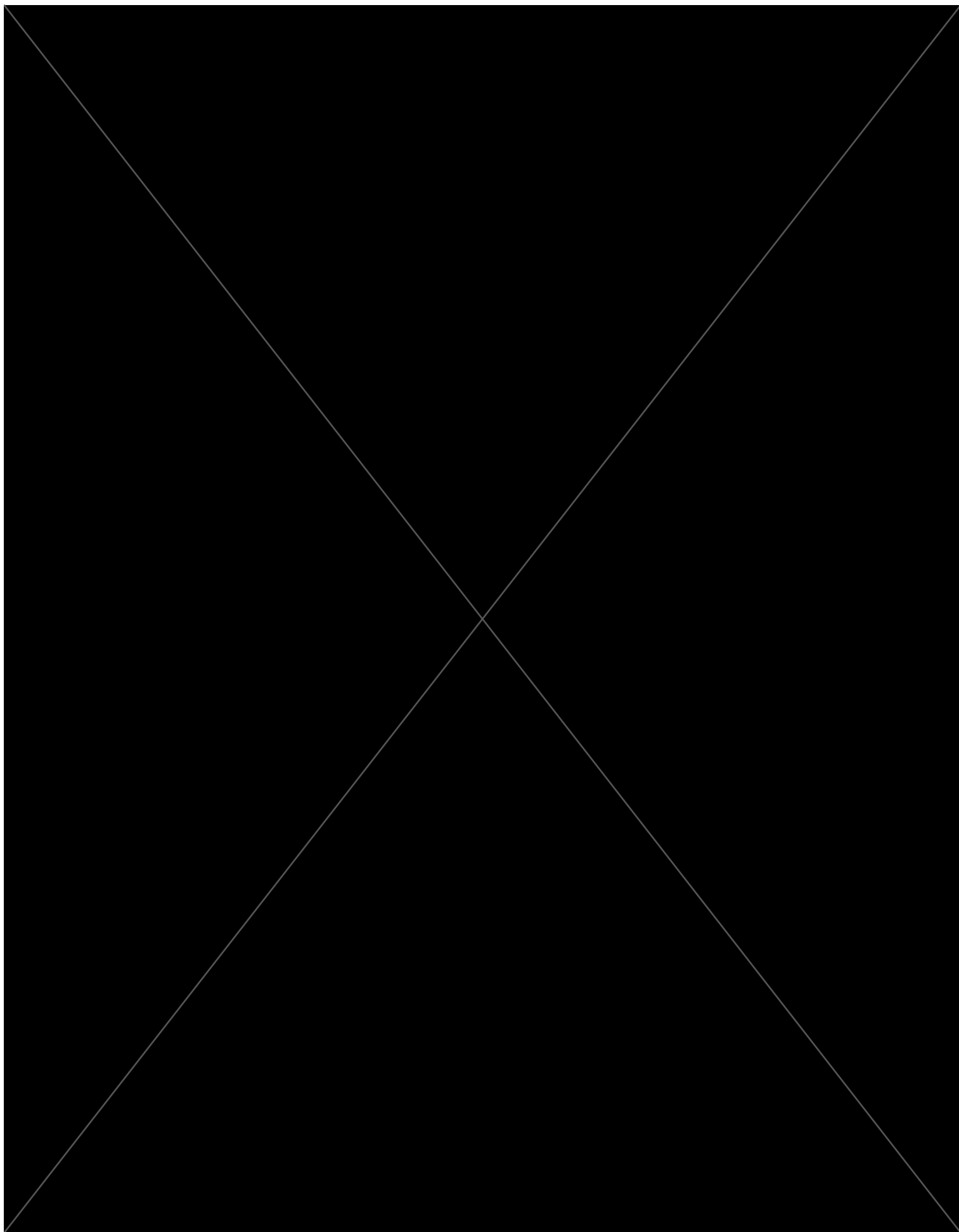


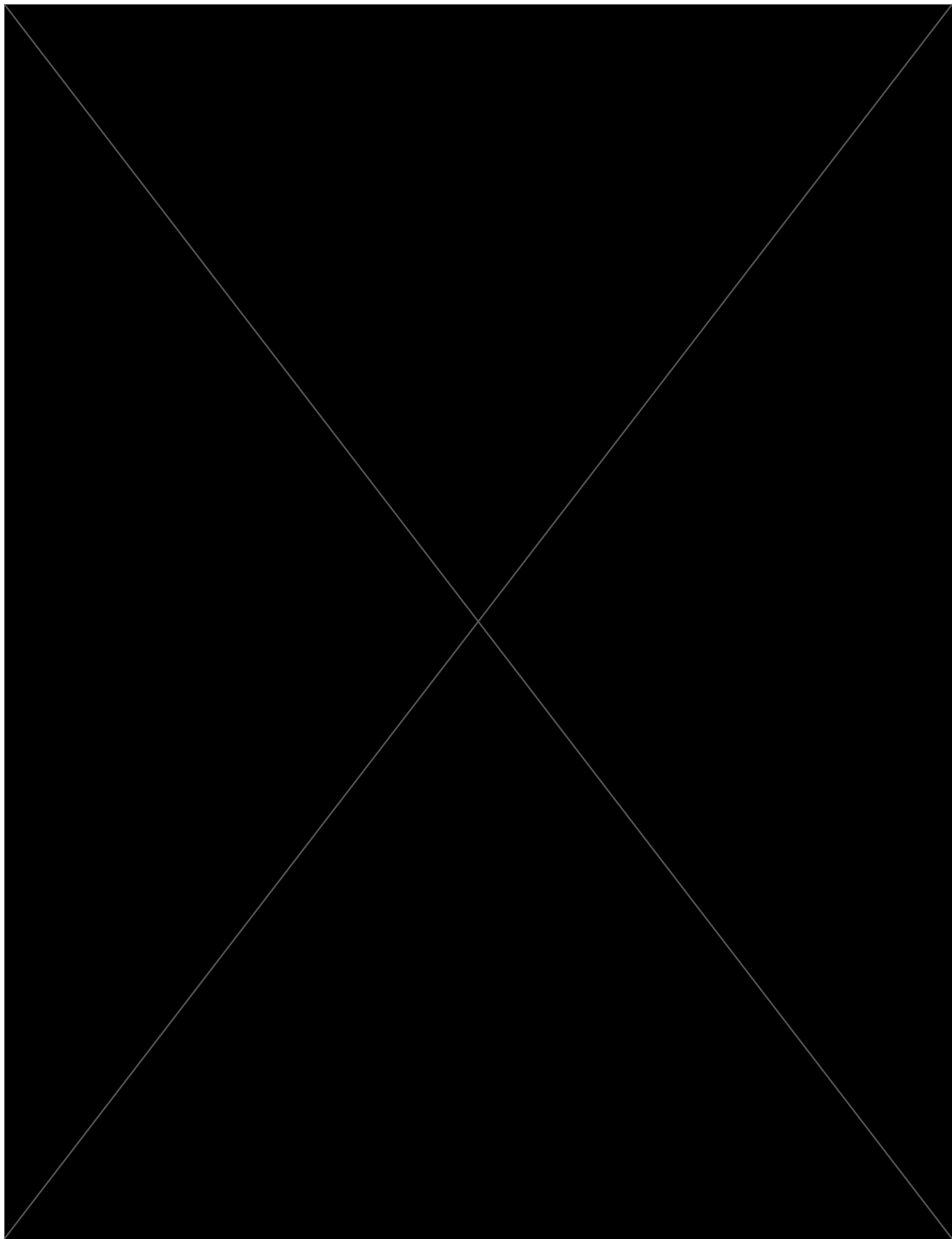


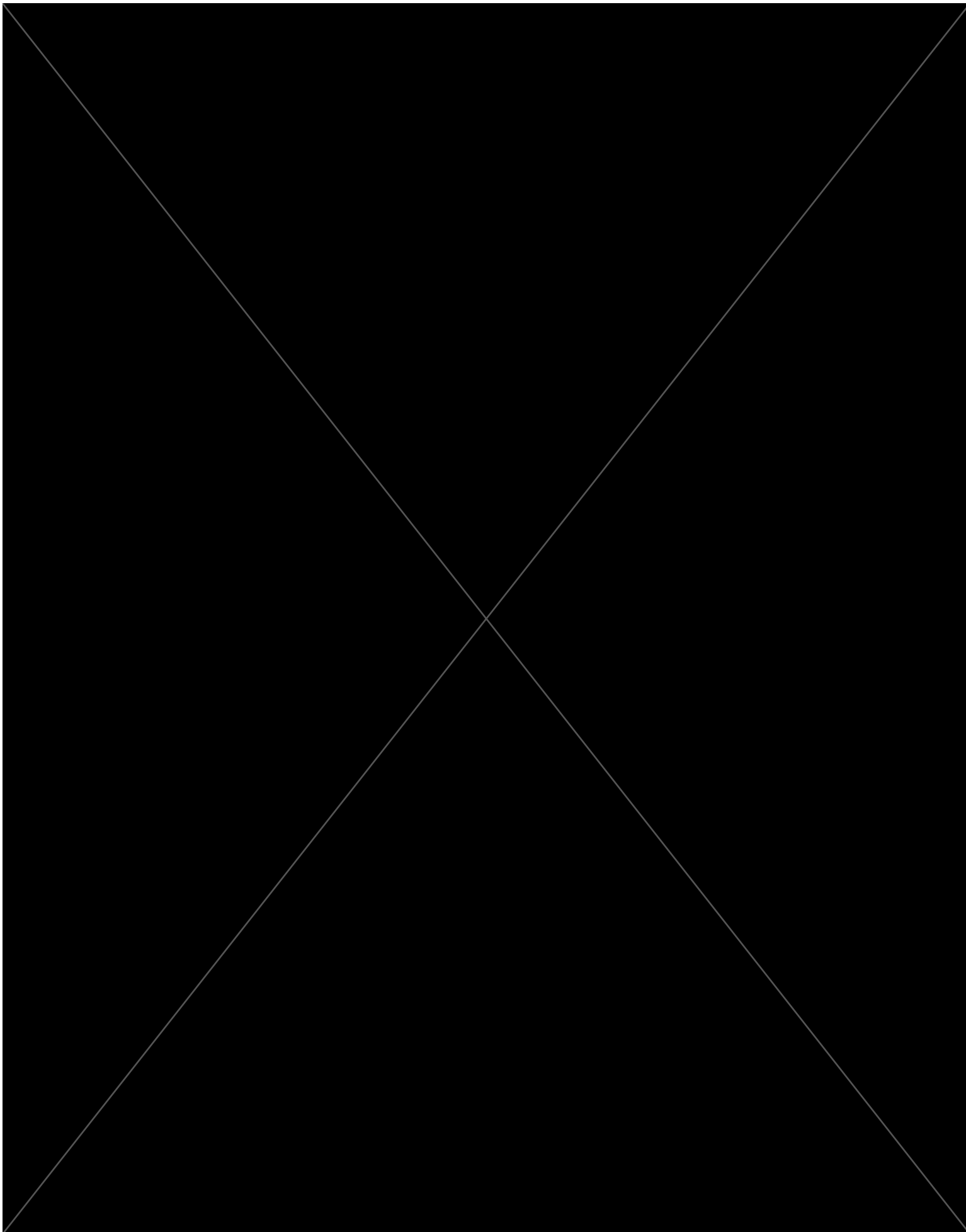




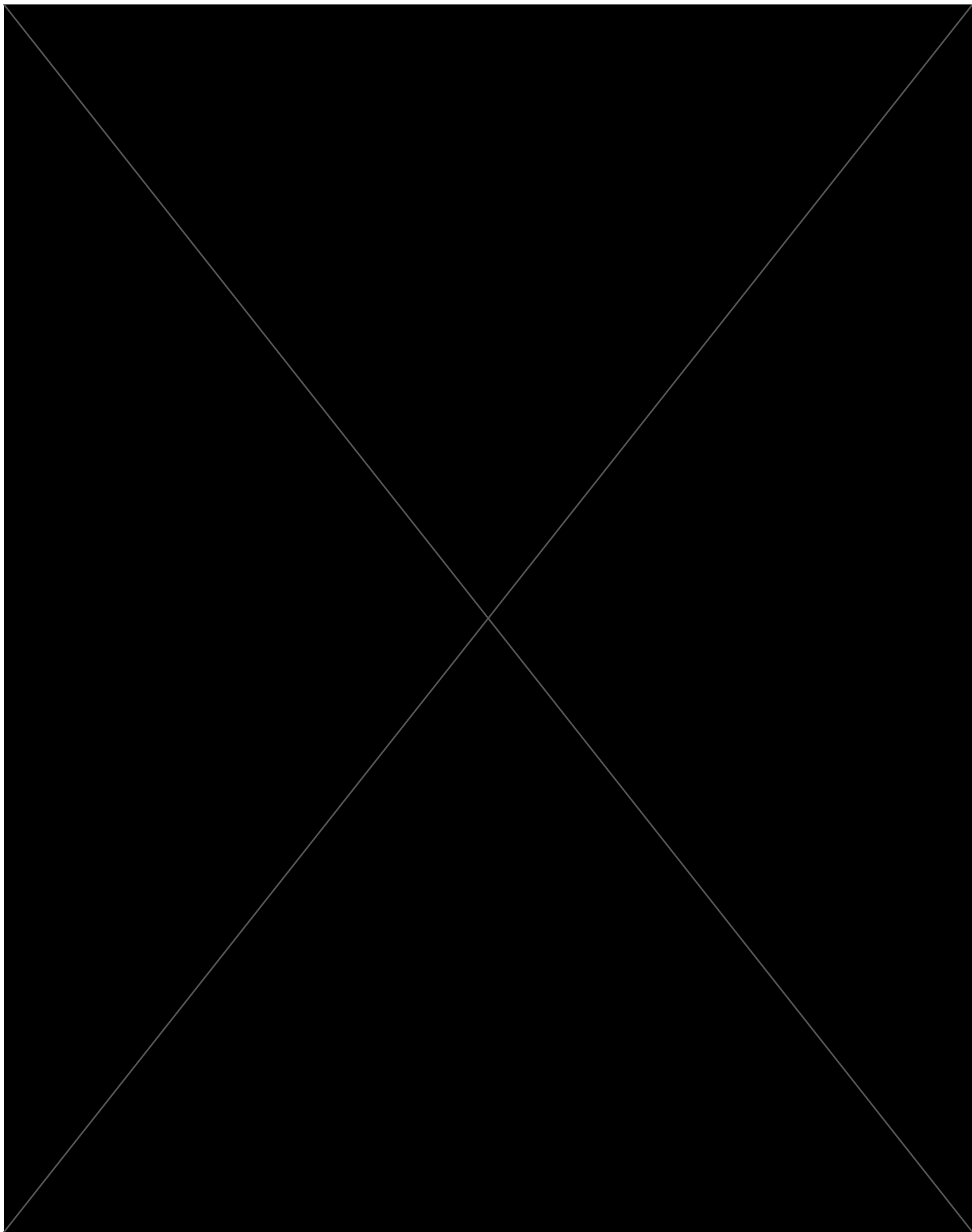


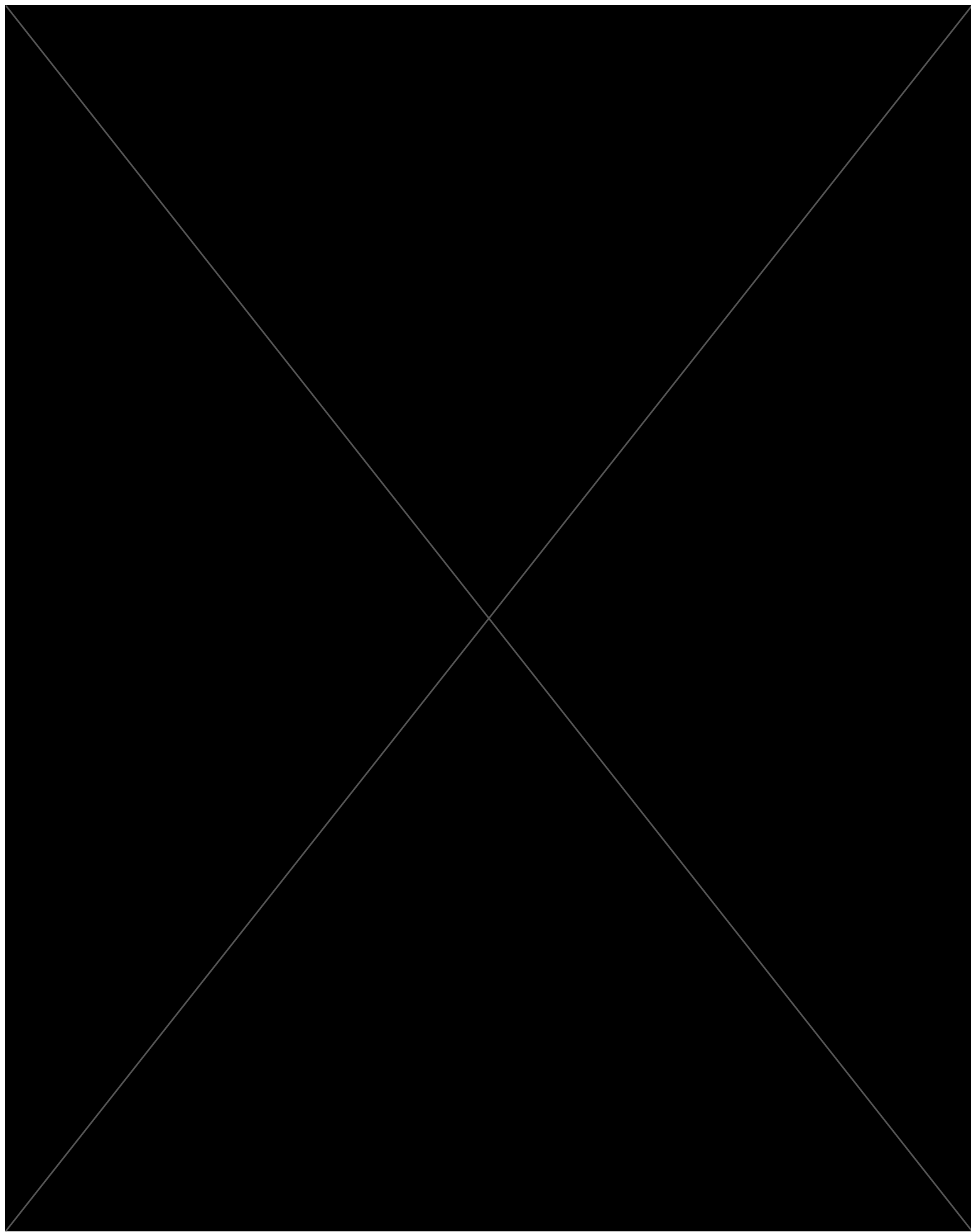


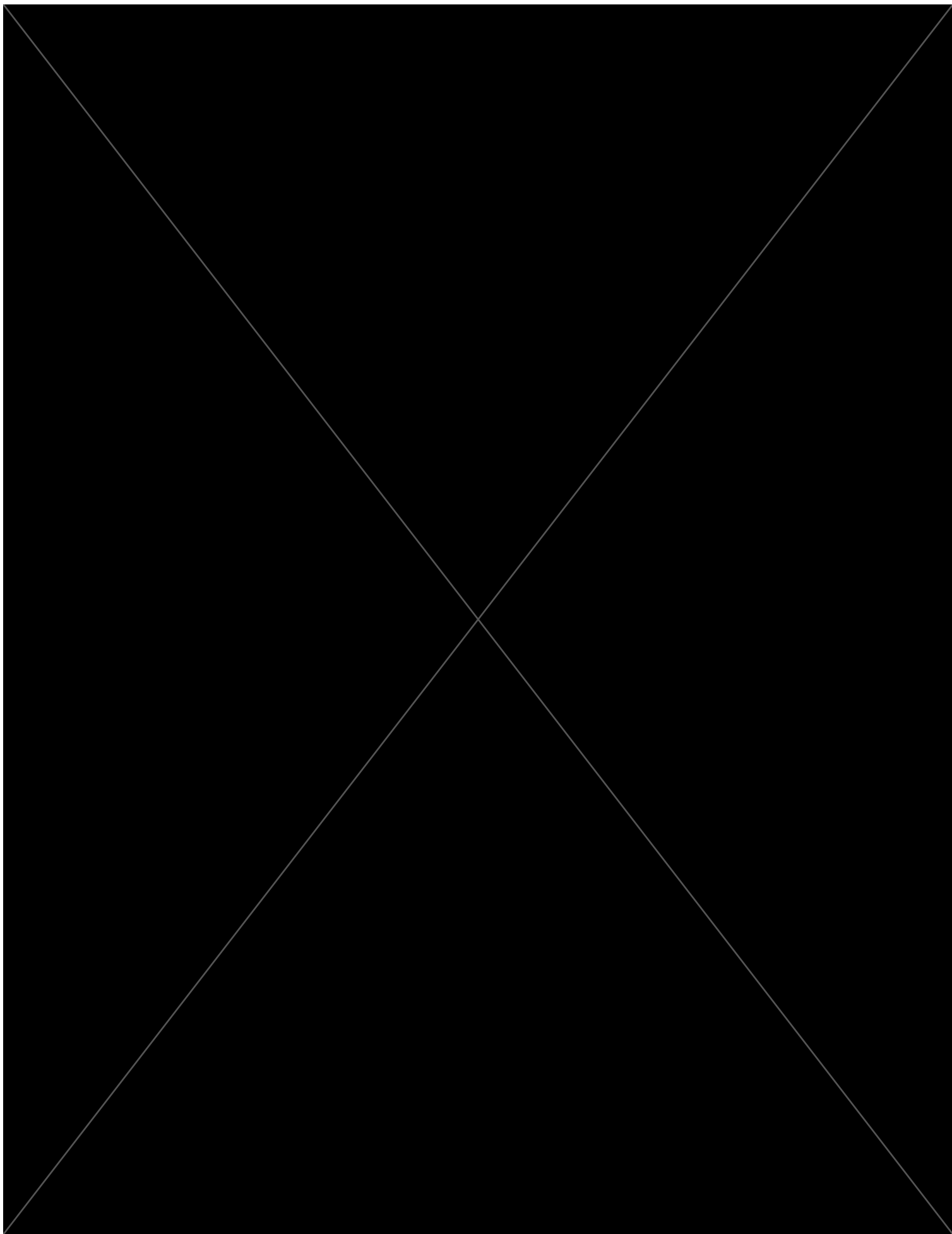


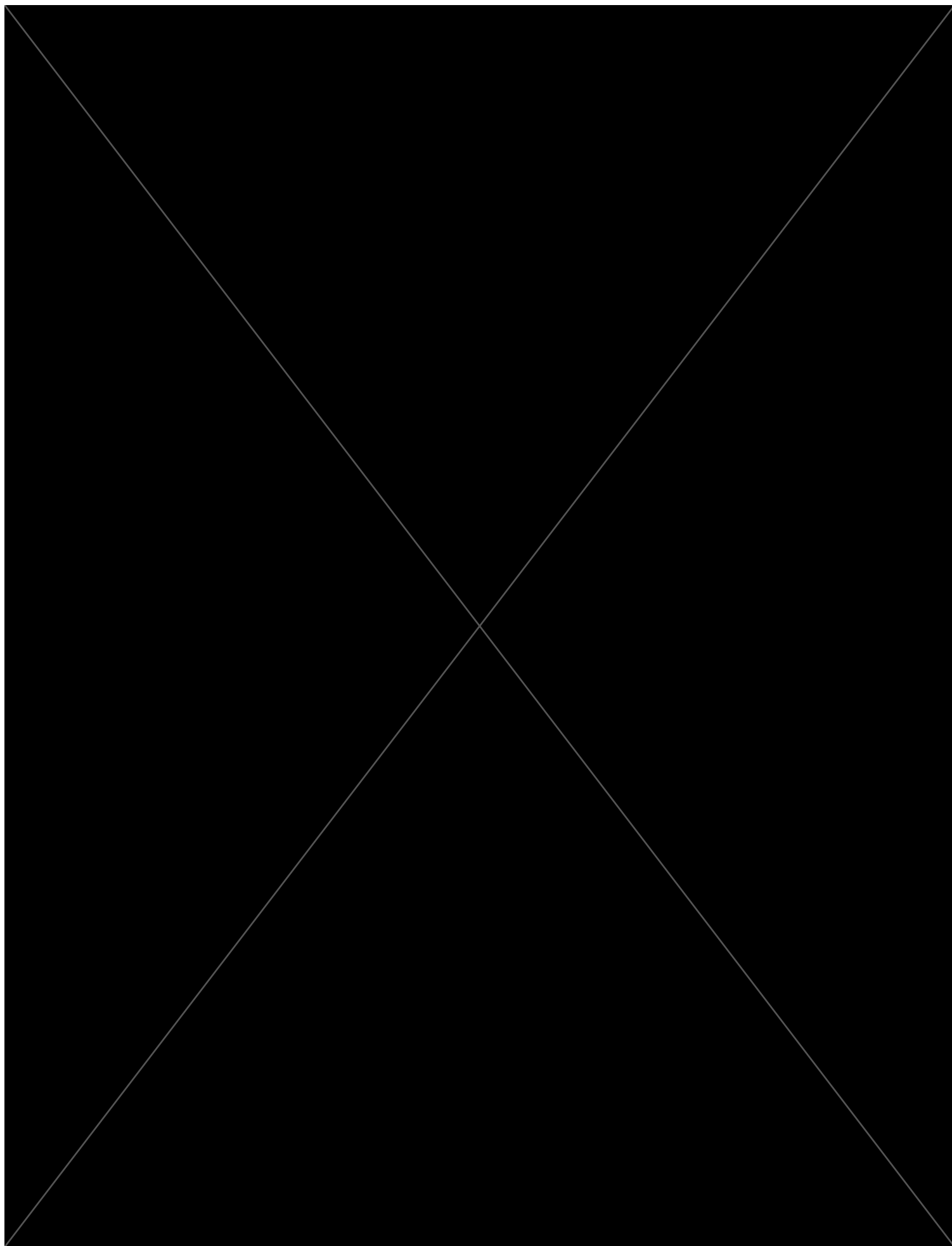


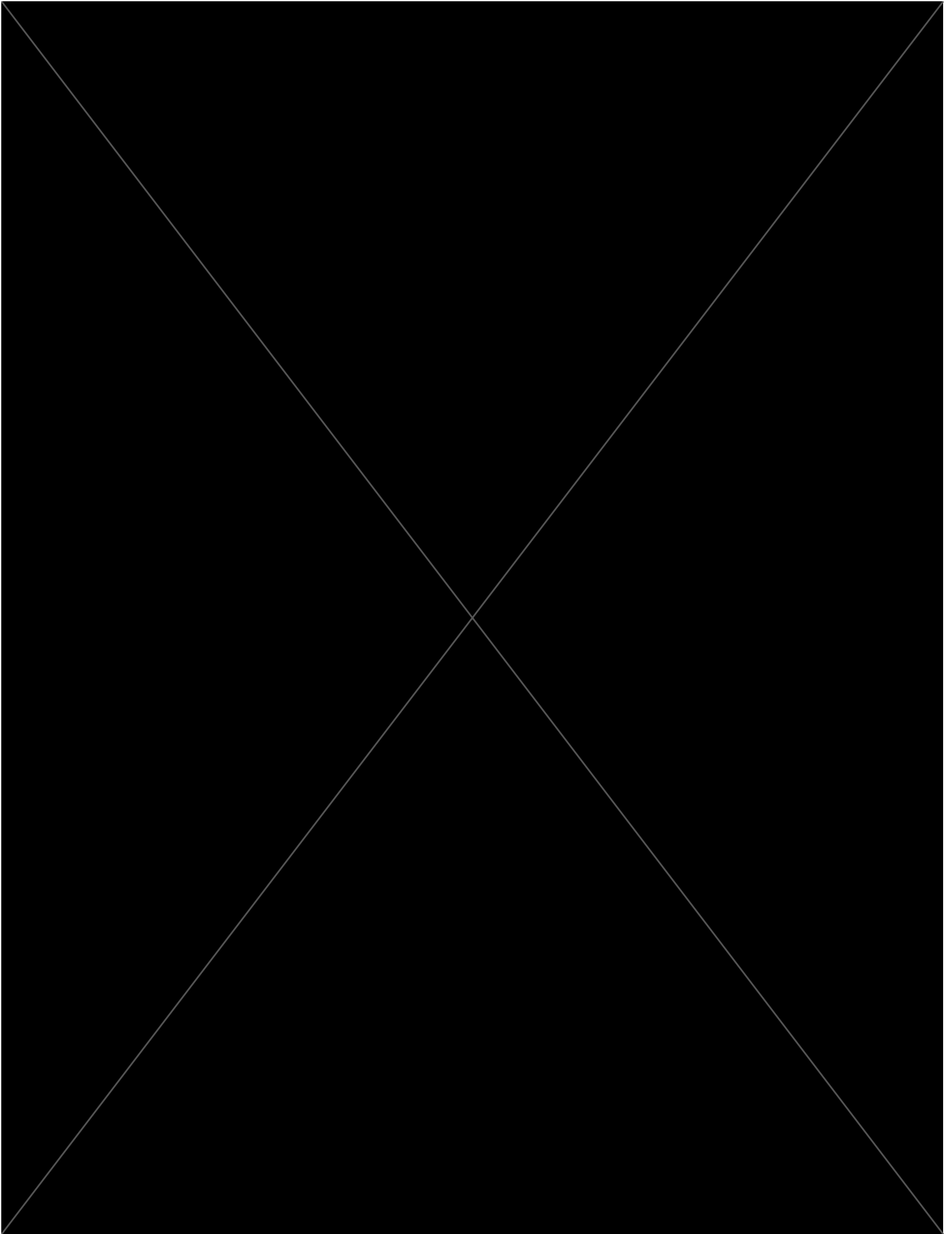


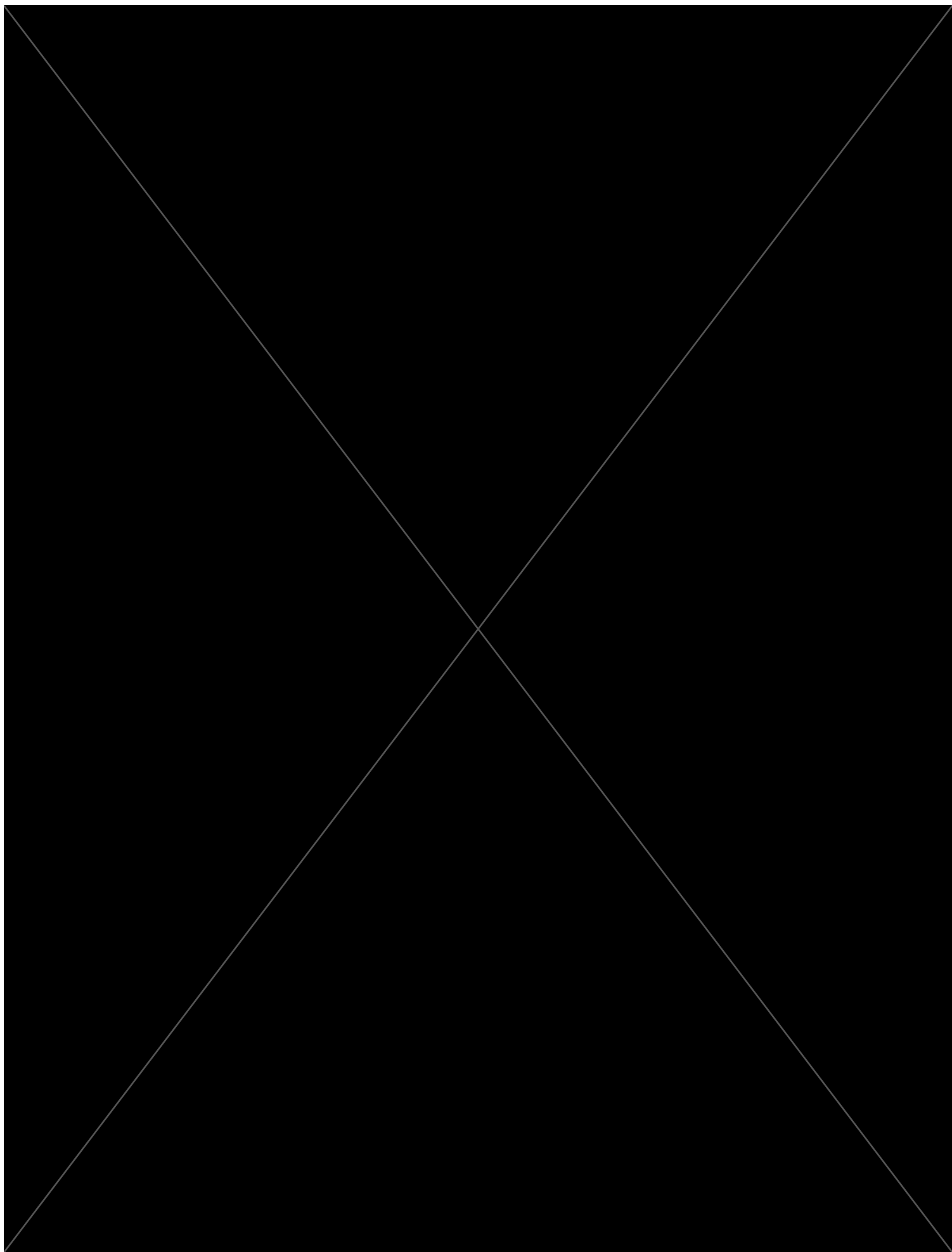


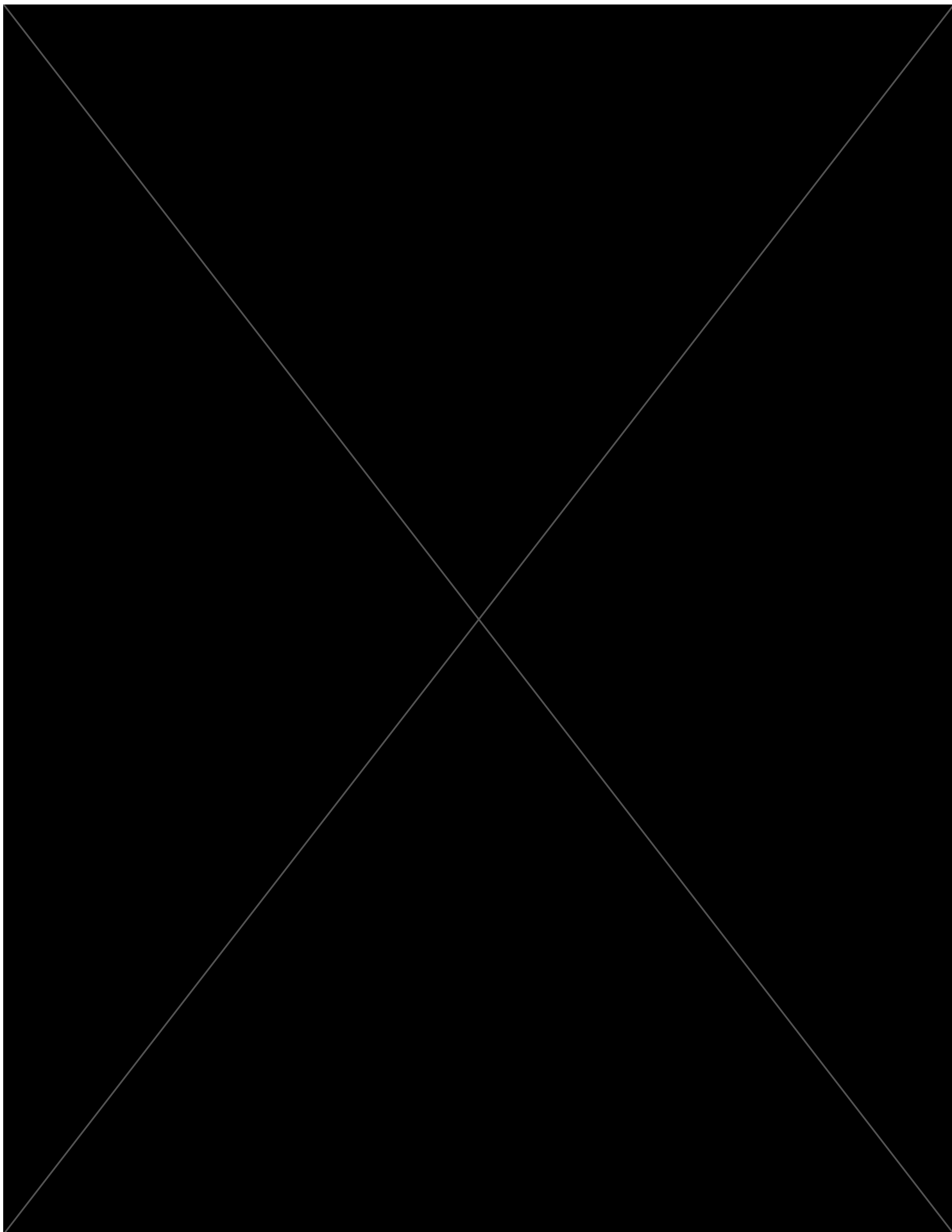


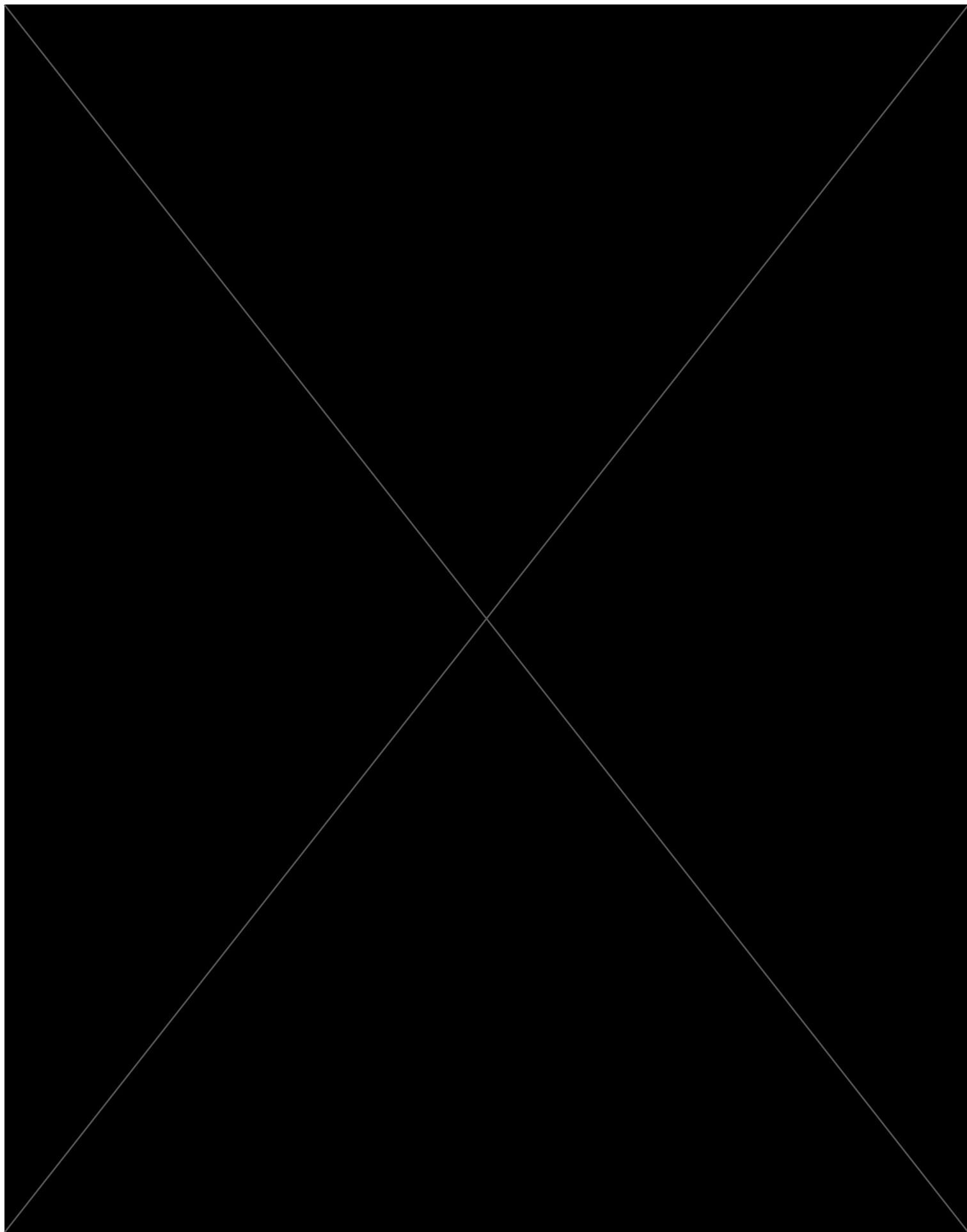




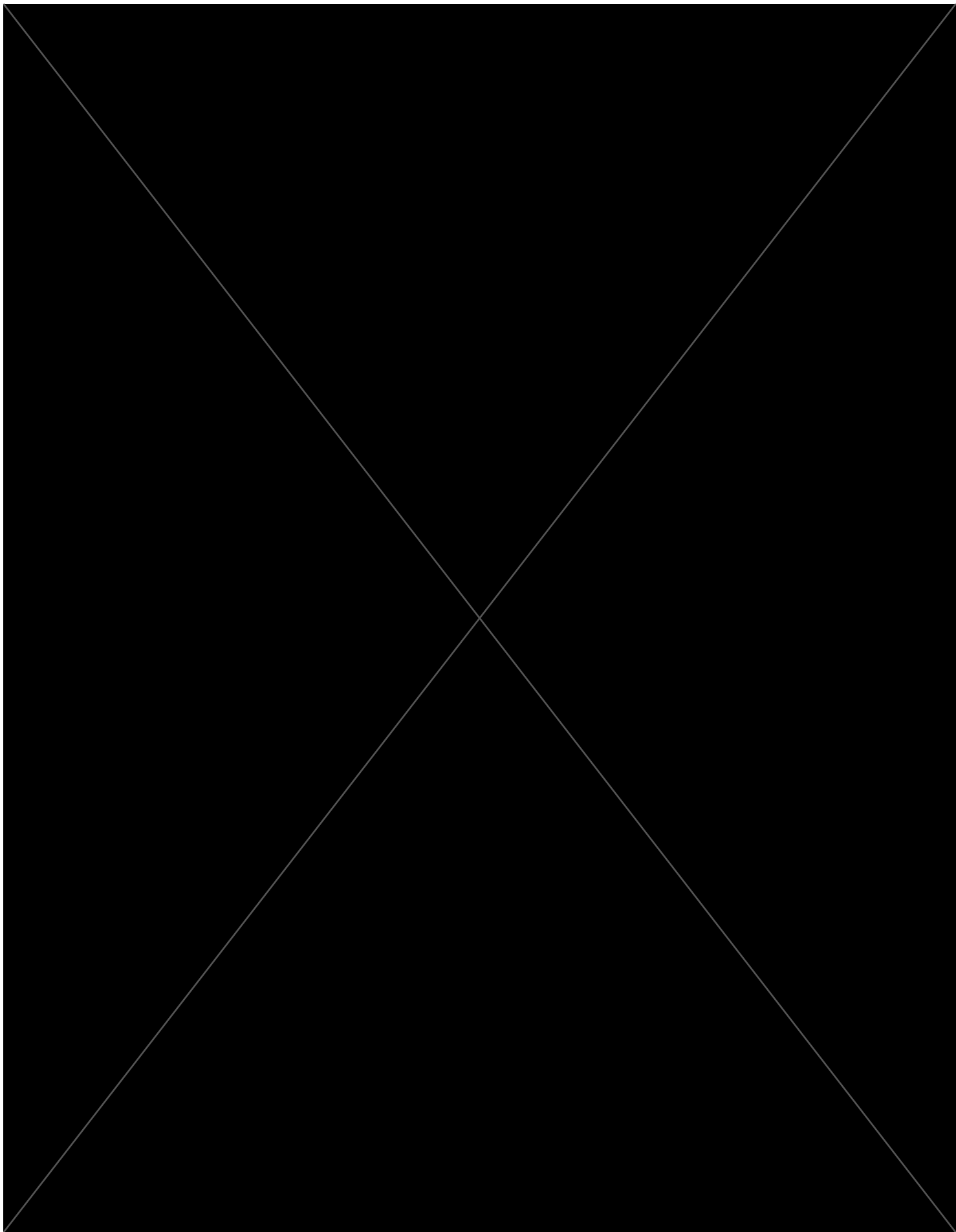


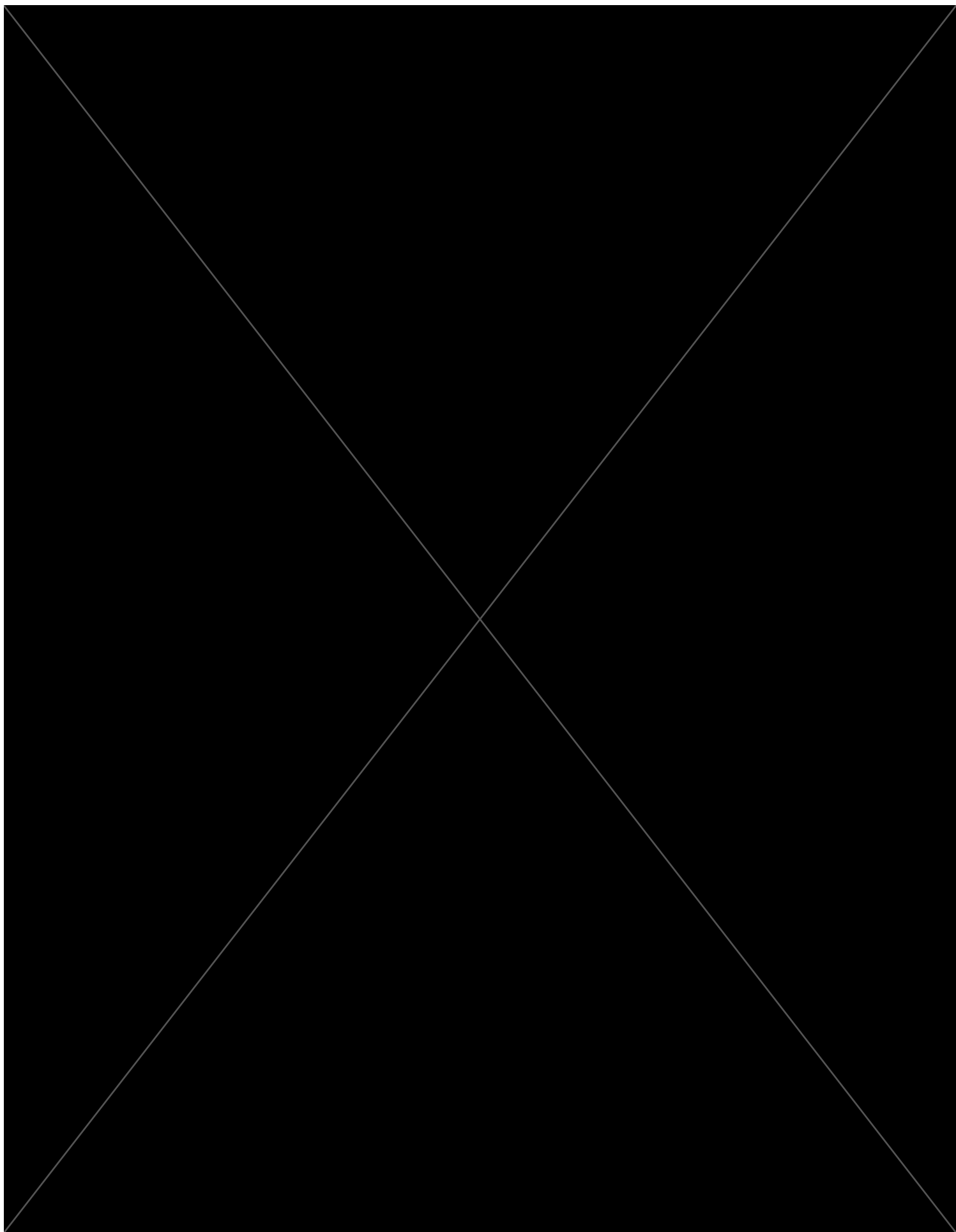


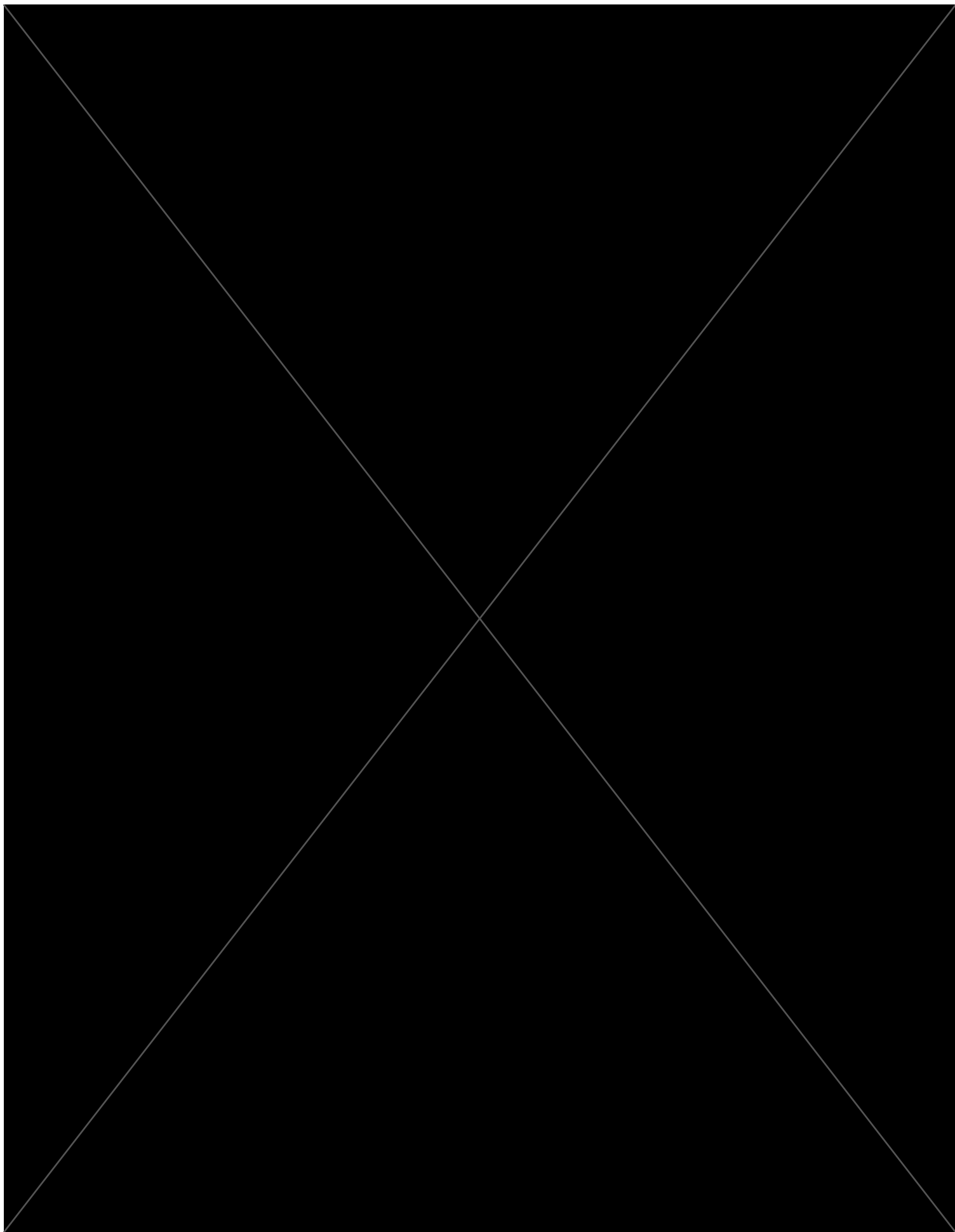


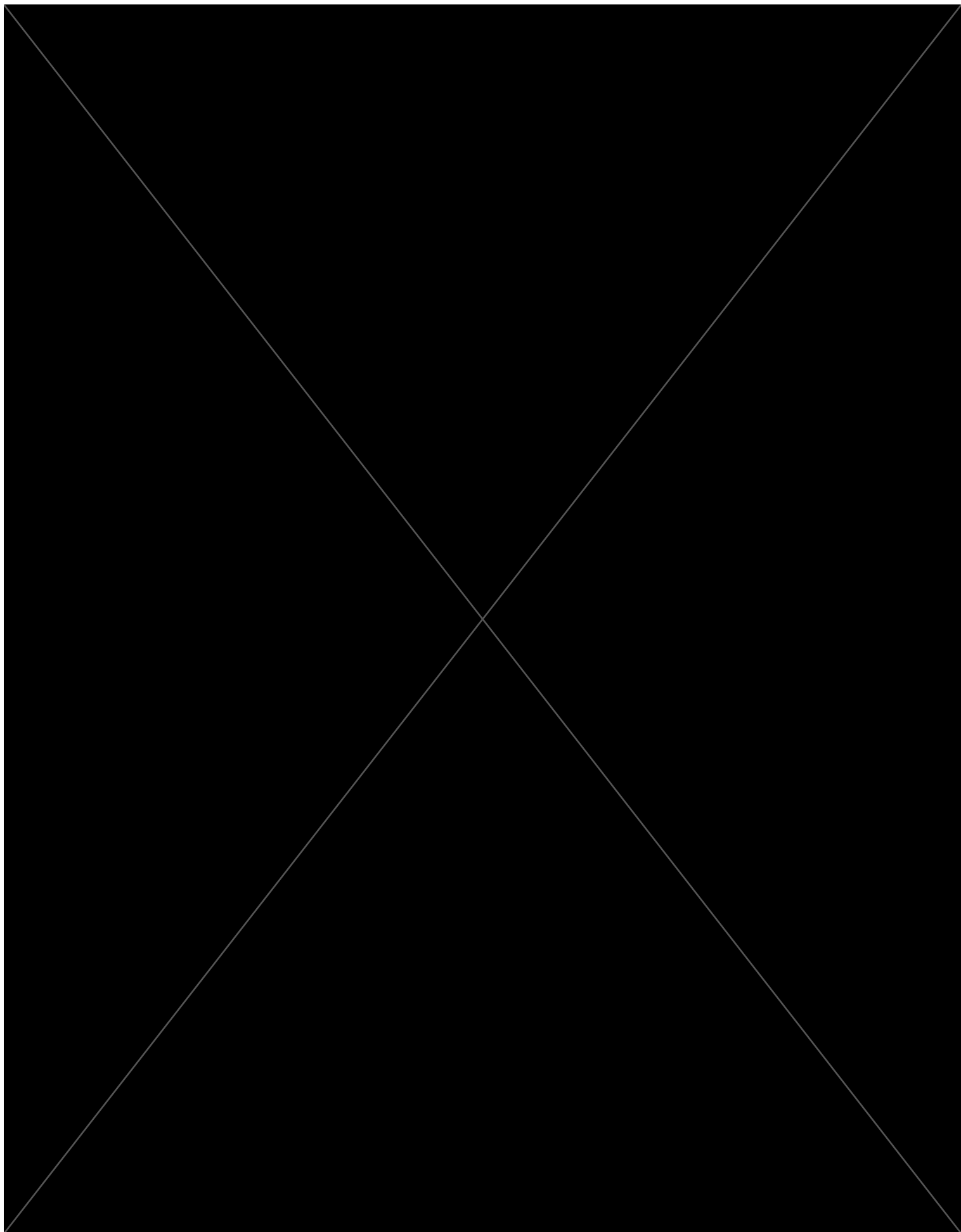


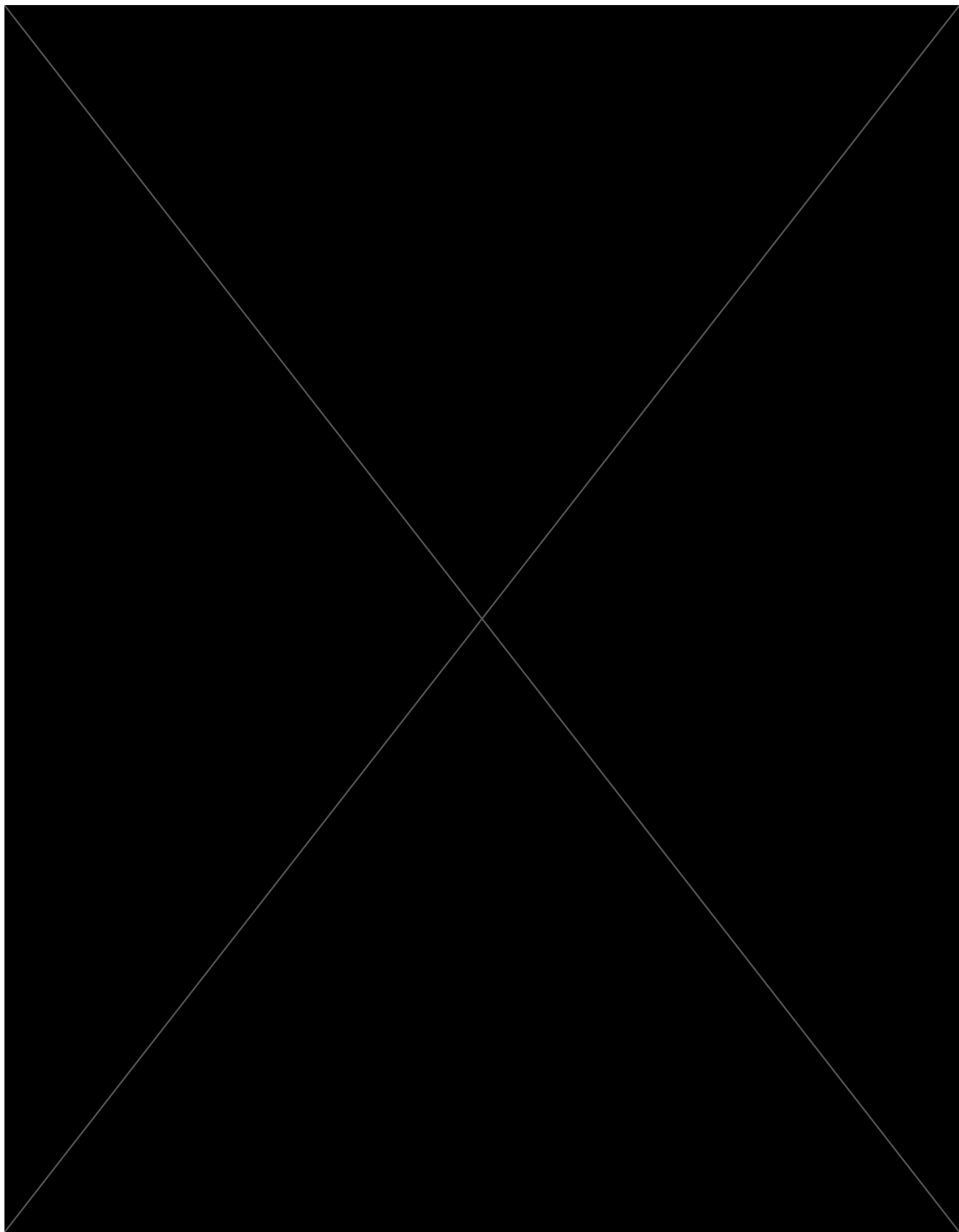


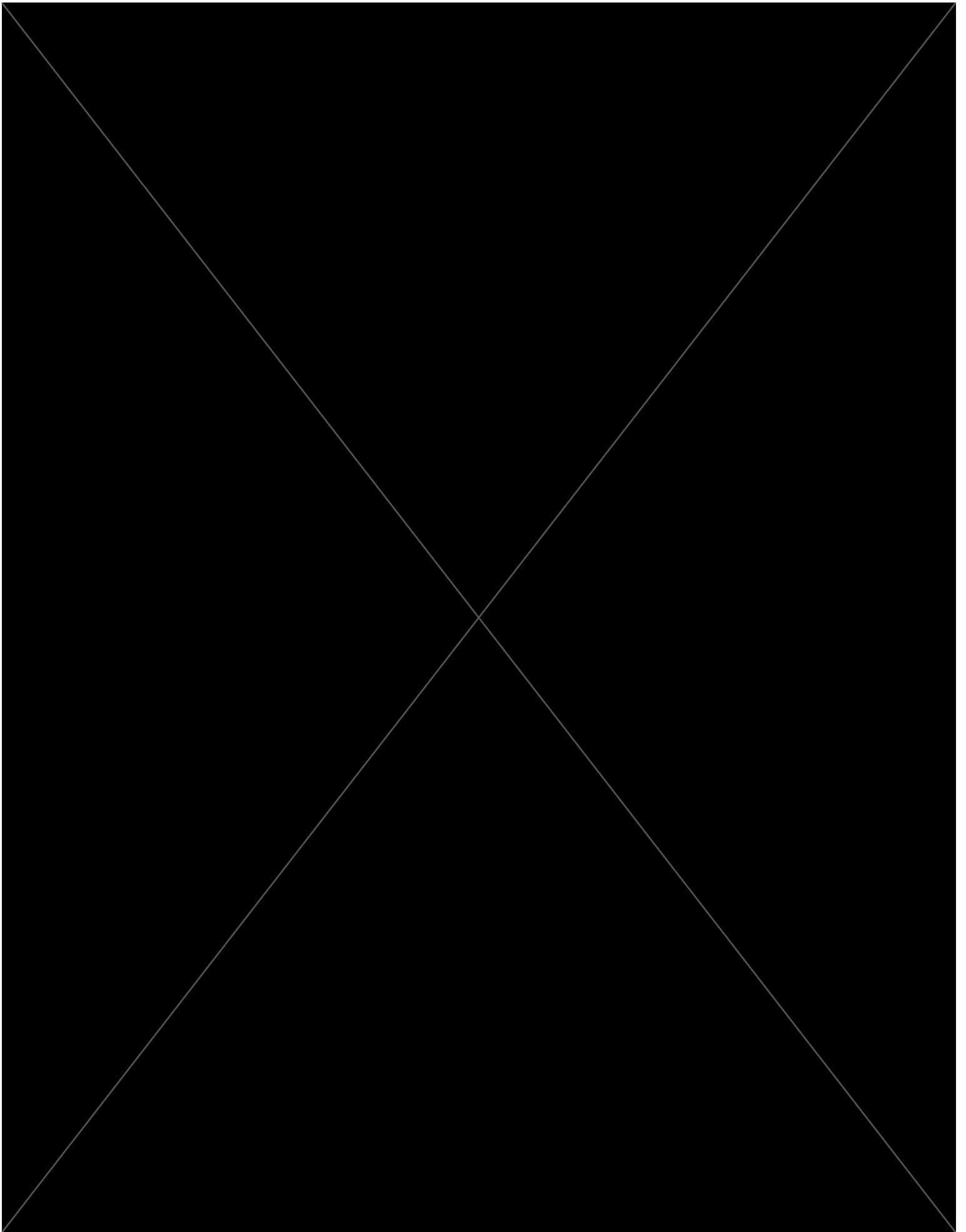


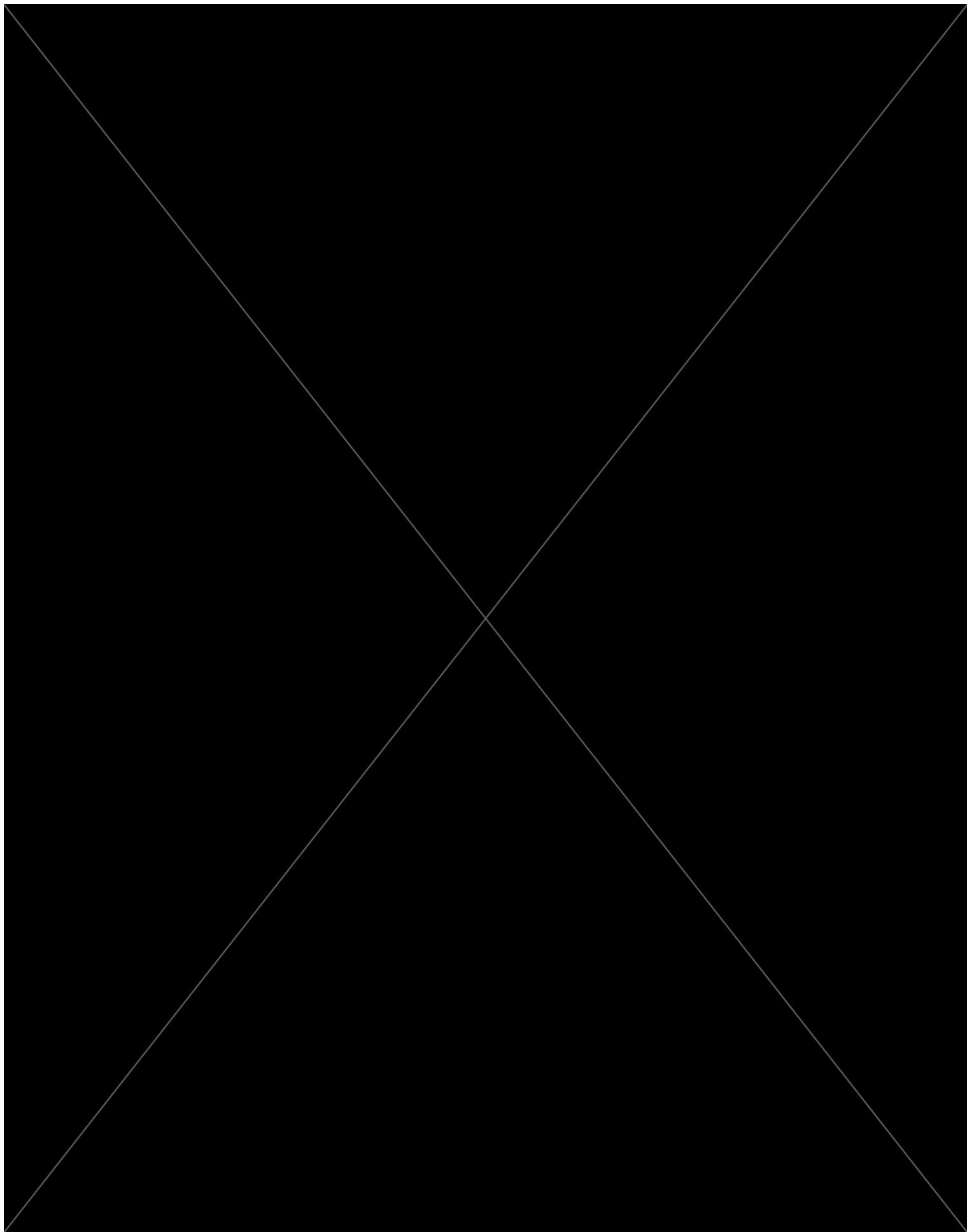


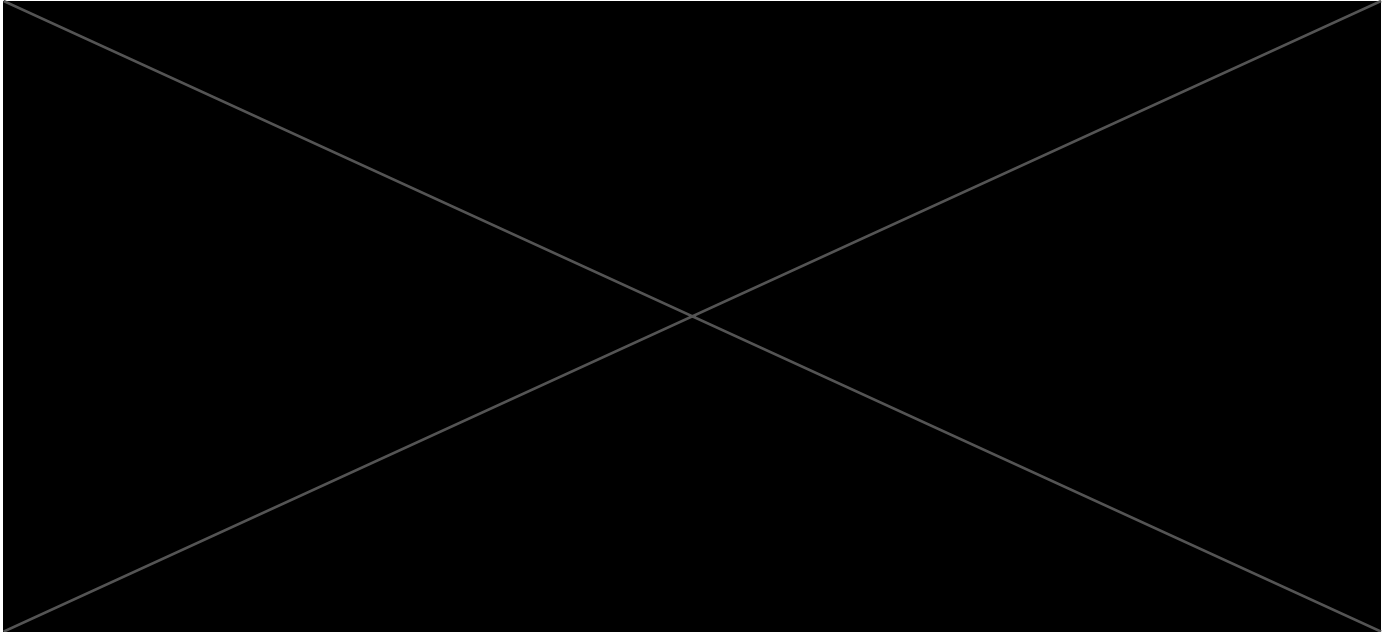














## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#),  
Deseret Wellness, 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  
Commercial Information

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:

Please see the attached GRAMA Claim of Business Confidentiality statement

Signed: \_\_\_\_\_

On behalf of (company): Deseret Wellness, LLC

Date: 01/30/2026



# Utah Department of Agriculture and Food

4315 S 2700 W  
Taylorsville,  
UT 84129

cannabis@utah.gov  
801-982-2375

## Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26-61a-304 and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules. Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statues and administrative rules change frequently, verify you are using the most up to date form.

### Application type

☐ New Application

☒ Renewal

### Business Information

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

Business Entity type: ☐ Individual ☐ Coropration ☐ Partnership ☒ LLC

Business Name: Deseret Wellness, LLC

DBA:

Physical Address:

1351 Kearns Blvd STE 110-B  
Park City, UT 84060



















































































## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#),

Dragonfly Wellness (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):

Intellectual property, SOPs & trade secrets, protected by law when applicable

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:

Document contains personal information, financial & ownership information, SOPs, IP, & training documentation for specific processes that are considered trade secrets, protected under applicable law.

Signed: 

On behalf of (company):

Dragonfly Wellness

Date:

1.26.26





# Utah Department of Agriculture and Food

4315 S 2700 W  
Taylorsville,  
UT 84129

cannabis@utah.gov  
801-982-2375

## Medical Cannabis Pharmacy Operating Plan Coversheet

In accordance with 26-61a-304, 4-41a and R66 a licensed Utah medical cannabis pharmacy must have an operating plan that describes how the pharmacy will comply with all applicable operating standards, statutes and administrative rules. This document is not intended to be a full comprehensive list of all operating standards, statutes and administrative rules. Medical cannabis facilities must be familiar with and comply with all operating standards, statutes and administrative rules. Statutes and administrative rules change frequently, verify you are using the most up to date form.

### Application type

☐ New Application

☒ Renewal

### Business Information

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

Business Entity type: ☐ Individual ☐ Corporation ☐ Partnership ☒ LLC

Business Name: \_\_\_\_\_ DBA: \_\_\_\_\_ Dragonfly Wellness

Physical Address: 711 s State Street, Salt Lake City, Utah 84111

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

Phone Number: \_\_\_\_\_

E-mail: \_\_\_\_\_

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

Contact Position: \_\_\_\_\_

Days/Hours of Business Operation: \_\_\_\_\_

Days/Hours of Open to Public: Monday-Saturday 8:00am - 9:00pm and Sunday 10:00am - 7:00pm

### Business Owner(s) Information

List of owners with 10% or greater financial or voting rights (include name and percentages). 4-41a-1202 (3)(b), 4-41a-1202 (10). List persons with power to direct or cause management or control of courier. 4-41a-1202 (3)(b)

Owner(s)		Management	
Name:	_____	Name:	_____
Phone Number:	_____	Phone Number:	_____
E-mail:	_____	E-mail:	_____
Ownership %	_____	Position	_____
Mailing Address	_____	Name:	_____
		Phone Number:	_____
Name:	_____	E-mail:	_____
Phone Number:	_____	Position	_____
E-mail:	_____		
Ownership %	_____	Name:	_____
Mailing Address	_____	Phone Number:	_____
		E-mail:	_____

		Position	
Name:		Name:	
Phone Number:		Phone Number:	
E-mail:		E-mail:	
Ownership %		Position	
Mailing Address			

The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full?  X  Yes \_\_\_ No

Descriptions of the credentials and experience of each officer, director, and owner and prospective employee who have a financial or voting interest of 10% or greater in the proposed cannabis pharmacy; or the power to direct or cause the management or control of a proposed cannabis production establishment. *Only required if this in an initial application or if information has changed*

A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.

An active business license from the city

Proof of Performance bond/liquid cash account.

## Medical Cannabis Pharmacy Operating Checklist

*Please attach operating plan in designated order in a single PDF*

### Organization Information

1. List of payment providers. 4-41a-1201(1-2), R66-5-16(3)(b)
2. Advertising Standards, signage, website, educational events etc. 4-41a-109, 4-41a-1104, R66-7, R66-5-17
3. Quality Improvement Plan. R66-5-5(3)(l)
4. Procedure to have laws/rules readily available for staff. R66-5-3(1)(d)
5. Procedure to store records of all transactions and employee lists. Include a list of current employees and positions. R66-5-3(1)(b), R66-5-5(3)(i)
6. Acknowledgment that license is not able to be sold or transferred. 4-41a-1001(10)(a), R66-5-3(8)(a)
7. Procedure of handling permanent closure of business. R66-5-14

### Building Requirements

8. Floor plan and architectural elevation. 4-41a-1004(1)
9. Procedure to keep facility lit, ventilated, clean and sanitary. R66-5-3(1)(a), R66-5-5(3)(h), R66-5-10
10. Procedure for hours of operations (open at least 35 hours and how to advise patients of closure during normal hours). R66-5-3(3-4)

### Security Plan

11. Floor plan with camera positions and areas of coverage. 4-41a-1101(12)(g-h), R66-5-7
12. Alarms, surveillance, locks. 4-41a-1101(12)(g-h), R66-5-7
13. Procedure to prevent diversion/theft. R66-5-7(6-8), R66-5-8(4), R66-5-8(6-8)
14. Emergency plan for theft or loss of product. R66-5-5(3)(i), R66-5-8
15. Procedure to safeguard EVS/ICS patient information. R66-5-3(6)
16. Check-in procedure (including curbside/ drive thru if applicable). R66-5-5(3), R66-5-16, R66-5-23
17. Procedure to prevent medical cannabis from being consumed at pharmacy. 4-41a-1101(7)
18. Procedure on cash handling. R66-5-7(6)(i)

19. Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.). 4-41a-1203, R66-5-9
<b>Employee Procedures</b>
20. Training Standards. R66-5-23, R66-5-26
21. Adequate staffing: PMP on duty, PIC assignments, reasonable ratio of agents to pharmacists, agent duties, supervision during deliveries, access while pharmacy closed. R66-5-5, R66-5-6
<b>Inventory Procedures</b>
22. Storage/ICS usage/product options. R66-5-8
23. Procedure to ensure correct labeling. 26B-4-201(23), 26B-4-201(39)(a)(ii), 4-41a-1101(8-9), 4-41a-1102(3)(a)(iv-vi), R66-5-5(3)(a), R66-5-7(7)(b)(ii)
24. Disposal Program>Returns process. 4-41a-1101(11), 4-41a-1205(3-4), R66-5-8(2), R66-5-9(2), R66-5-11
25. Procedure for product Recall. R66-5-12
<b>Sales Procedures</b>
26. Procedure to keep sales within the state or RMP dosage limit, standards for partial filling. 26B-4-231, R66-5-5
27. Procedure to prohibit sale of expired, misbranded, adulterated, opened product. R66-5-3(7), R66-5-10(4)
28. Procedure to enter LMP certifications. R66-5-22
29. How do you plan to meet requirements related to the patient information insert. What options are planned to be provided for patients. 26B-4-201(41), 4-41a-1101(12)(i)
<b>Change Requests (Renewal Only)</b>
30. Attach all approved change requests to the application R66-5-18
<b>Home Delivery (If Applicable)</b>
31. List and description of vehicles meeting appropriate standards. R66-6-3(3)(f), R66-6-3(6)
32. Location and description of where the vehicles are housed when not in use. 4-41a-1202(13), R66-6-3(3)(f), R66-6-3(8)
33. Procedure to maintain records of employees. 4-41a-1204(9), R66-6-3(3)(e)
34. Employee Training Standards. R66-6-7
35. Security Plan. 4-41a-1202(13)(d)
36. Storage plan that keeps product safe and sanitary. 4-41a-1202(13)(e), 4-41a-1205(3)(a)(i)
37. Procedure for creating/maintaining the manifest and trip log. 4-41a-404, R66-6-3(3)(g), R66-6-3(3)(i)
38. Procedure if items are missing. R66-6-3(9)
39. Return procedures. 4-41a-1205(3-4), R66-6-3(10)
<b>Delivery Procedures</b>
40. Payment has been made prior to delivery. 4-41a-1205 (2)(c)(iii)
41. Record keeping in ICS. R66-6-3(3)(b), R66-6-4(2)(a)
42. No person other than courier agent in vehicle. R66-6-3(3)(h), R66-6-4(2)(d)
43. Verify delivery is to the cardholder. R66-6-3(4)(a), R66-6-4(3)(a)
44. Only deliver during 6am-10pm. R66-6-3(4)(b), R66-6-4(3)(b)
45. Does not leave product unattended for more that 1 hour in vehicle. R66-6-3(4)(c), R66-6-4(3)(c)
46. Does not make changes to orders. R66-6-3(4)(d), R66-6-4(3)(d)
47. No product consumed. R66-6-3(4)(e), R66-6-4(3)(e)
48. Wear a name badge. R66-6-3(5)(a), R66-6-4(4)(a)
49. Provide PMP contact info and hours of availability. R66-6-3(5)(b), R66-6-4(4)(b)

## Certification and Acknowledgements

Applicant understands the requirements for licensure are based on current statute and rule and are subject to change. Applicant agrees as a condition of licensing that he has read and will abide by the provisions of Utah Code 4-41a and all rules promulgated thereunder and all directives of the Utah Department of Agriculture and Food. The applicant 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.

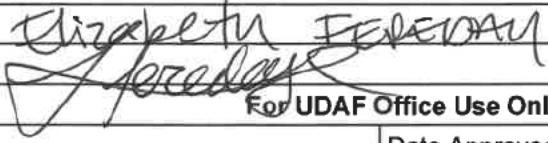
Applicant agrees to immediately notify the department of any change in ownership or financial interest of the facility; the facility's name, change in location, remodeling, expansion, reduction or physical, non-cosmetic alteration of the facility, change in written operating procedures, or change in any information submitted in this application.

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 agents 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.

Applicant 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 regard 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 they have read and understand 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.

Name:	Elizabeth FEREDAY	
Signature:		Date: 1.5.26
For UDAF Office Use Only		
Date Received:	Date Approved:	
Compliance Officer:		



**SLC Dragonfly Wellness  
2026 Operating Plan**

**The applicant understands that as an applicant and potential licensee you are REQUIRED to know the current statutory law, administrative rules and Departmental policies and comply in full?**

**Descriptions of the credentials and experience of each officer, director, and owner and prospective employee who have a financial or voting interest of 10% or greater in the proposed cannabis pharmacy; or the power to direct or cause the management or control of a proposed cannabis production establishment.**

**A description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.**

**An active business license from the city**

**Proof of Performance bond/liquid cash account.**







## **Organization Information**

### **1. List of payment providers. 4-41a-1201(1-2), R66-5-16(3)(b)**

a.

### **2. Advertising Standards, signage, website, educational events etc. 4-41a-109, 4-41a-1104, R66-7, R66-5-17**

a.

### **3. Quality Improvement Plan. R66-5-5(3)(l)**

a.

### **4. Procedure to have laws/rules readily available for staff. R66-5-3(1)(d)**

a.

5. Procedure to store records of all transactions and employee lists. Include a list of current employees and positions. R66-5-3(1)(b), R66-5-5(3)(i)
  - a.



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**6. Acknowledgment that license is not able to be sold or transferred.**  
**4-41a-1001(10)(a), R66-5-3(8)(a)**

**7. Procedure of handling permanent closure of business. R66-5-14**  
**a.**

## **Building Requirements**

- 8. Floor plan and architectural elevation.  
4-41a-1004(1)**







9. Procedure to keep facility lit, ventilated, clean and sanitary. R66-5-3(1)(a), R66-5-5(3)(h), R66-5-10

**10. Procedure for hours of operations (open at least 35 hours and how to advise patients of closure during normal hours). R66-5-3(3-4)**

**Security Plan**

**11. Floor plan with camera positions and areas of coverage.  
4-41a-1101(12)(g-h), R66-5-7**



**12. Alarms, surveillance, locks. 4-41a-1101(12)(g-h), R66-5-7**

**13. Procedure to prevent diversion/theft. R66-5-7(6-8), R66-5-8(4), R66-5-8(6-8)**

**14. Emergency plan for theft or loss of product. R66-5-5(3)(i), R66-5-8**

**15. Procedure to safeguard EVS/ICS patient information. R66-5-3(6)**

**16. Check-in procedure (including curbside/ drive thru if applicable).  
R66-5-5(3), R66-5-16, R66-5-23**



















**17. Procedure to prevent medical cannabis from being consumed at pharmacy. 4-41a-1101(7)**

**18. Procedure on cash handling. R66-5-7(6)(i)**

**19. Transportation Procedure (between pharmacies, recalls/disposition back to processor, etc.). 4-41a-1203, R66-5-9**







## **Employee Procedures**

**20. Training Standards. R66-5-23, R66-5-26**

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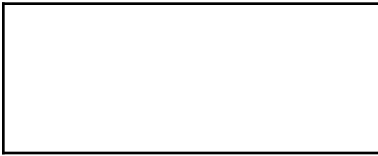






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**21. Adequate staffing: PMP on duty, PIC assignments, reasonable ratio of agents to pharmacists, agent duties, supervision during deliveries, access while pharmacy closed. R66-5-5, R66-5-6**

### **Inventory Procedures**

**22. Storage/ICS usage/product options. R66-5-8**

**23. Procedure to ensure correct labeling. 26B-4-201(23), 26B-4-201(39)(a)(ii), 4-41a-1101(8-9), 4-41a-1102(3)(a)(iv-vi), R66-5-5(3)(a), R66-5-7(7)(b)(ii)**





**24. Disposal Program/Returns process. 4-41a-1101(11), 4-41a-1205(3-4),  
R66-5-8(2), R66-5-9(2), R66-5-11**





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## **25. Procedure for product Recall. R66-5-12**

### **Sales Procedures**

**26. Procedure to keep sales within the state or RMP dosage limit, standards for partial filling. 26B-4-231, R66-5-5**

**27. Procedure to prohibit sale of expired, misbranded, adulterated, opened product. R66-5-3(7), R66-5-10(4)**

**28. Procedure to enter LMP certifications. R66-5-22**



29. How do you plan to meet requirements related to the patient information insert. What options are planned to be provided for patients. 26B-4-201(41), 4-41a-1101(12)(i)

**Change Requests (Renewal Only)**

30. Attach all approved change requests to the application R66-5-18

**Home Delivery (If Applicable)**

31. List and description of vehicles meeting appropriate standards.  
R66-6-3(3)(f), R66-6-3(6)



**32. Location and description of where the vehicles are housed when not in use. 4-41a-1202(13), R66-6-3(3)(f), R66-6-3(8)**

**33. Procedure to maintain records of employees. 4-41a-1204(9), R66-6-3(3)(e)**

**34. Employee Training Standards. R66-6-7**

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**35. Security Plan. 4-41a-1202(13)(d)**

**36. Storage plan that keeps product safe and sanitary. 4-41a-1202(13)(e),  
4-41a-1205(3)(a)(i)**

**37. Procedure for creating/maintaining the manifest and trip log. 4-41a-404,  
R66-6-3(3)(g), R66-6-3(3)(i)**





**38. Procedure if items are missing. R66-6-3(9)**

**39. Return procedures. 4-41a-1205(3-4), R66-6-3(10)**

### **Delivery Procedures**

**40. Payment has been made prior to delivery. 4-41a-1205 (2)(c)(iii)**

**41. Record keeping in ICS. R66-6-3(3)(b), R66-6-4(2)(a)**

**42. No person other than courier agent in vehicle. R66-6-3(3)(h), R66-6-4(2)(d)**

**43. Verify delivery is to the cardholder. R66-6-3(4)(a), R66-6-4(3)(a)**

**44. Only deliver during 6am-10pm. R66-6-3(4)(b), R66-6-4(3)(b)**

**45. Does not leave product unattended for more than 1 hour in vehicle.  
R66-6-3(4)(c), R66-6-4(3)(c)**

**46. Does not make changes to orders. R66-6-3(4)(d), R66-6-4(3)(d)**

**47. No product consumed. R66-6-3(4)(e), R66-6-4(3)(e)**

**48. Wear a name badge. R66-6-3(5)(a), R66-6-4(4)(a)**

**49. Provide PMP contact info and hours of availability. R66-6-3(5)(b),  
R66-6-4(4)(b)**









































## 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 2026 Medical Cannabis Pharmacy 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 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 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 unlawful diversion of medical cannabis.
- 4) The information provided contains proprietary data, trade secrets, and/or sensitive business information, including operational processes and personal information. Disclosure of this information to the public or competitors would result in substantial competitive harm, hinder operational efficiency, and negatively impact the organization. Therefore, this information is protected under applicable laws and regulations to safeguard business interests. True North will supplement any additional information related to its GRAMA request as the State may require.

Signed: \_\_\_\_\_ Alyssa Sofferin

On behalf of (company): \_\_\_\_\_ True North of Utah, LLC DBA The Flower Shop Logan

Date: \_\_\_\_\_ February 3, 2026

































































































































## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#), **Dragonfly Moroni Processing** (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):

Intellectual property, SOPs & trade secrets, protected by law when applicable

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:

Document contains personal information, financial & ownership information, SOPs, IP, & training documentation for specific processes that are considered trade secrets, protected under applicable law.

Signed: \_\_\_\_\_

On behalf of (company):

Date:

*Frederick*  
**Dragonfly Moroni Processing**  
**1.26.21**



**2026 Moroni Dragonfly Processing  
Operating Plan**

## Ownership & Contact Information

### OWNERSHIP & CONTACT INFORMATION

Ownership Entity:

#### Business Contact

Name:

Business Phone:

Email:

#### Facility Manager Contact

Name:

Phone:

Email:

#### Contact Person for Inspection

Name:

Phone:

Email:

#### Contact Person for Sampling/Results

Name:

Phone:

Email:

Facility Address:

Mailing Address:

*An owner is a person who, if the company is privately held, has a financial or voting interest of 2% or greater in the cannabis production establishment; or if the entity is publicly traded has more than a 2% financial interest in the company; or is an individual who has the power to direct or cause the management or control of a facility, in other words is a general manager of daily operations.*

List all Owners and their positions in the Company

Provide a description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses.

### Property Information

### Days & Hours of Operation

### Days Open for Business (Projected)

### Processing Establishment Property Information

All information in this section must follow specific requirements as outlined in Utah Administrative Rule: Cannabis Cultivation (R66-1), Cannabis Processing (R66-2), Quality Assurance Testing on Cannabis (R66-3), and/or Independent Cannabis Testing Laboratory (R66-4) as applicable to the license type you are seeking.

Please upload the establishment's current facility blueprint with:

- a) the square footage of the areas where cannabis is extracted;
- b) the square footage of the area(s) where cannabis products are manufactured;
- c) location of all extraction machinery/ stationary equipment;
- d) the square footage of the areas used for storage and what type of product is stored there (i.e crude oil, untested products, final tested product) ;
- e) the areas where cannabis is to be dried, trimmed, and cured (if applicable);
- f) the square footage of the areas where cannabis is to be packaged;
- g) the location of the toilet facilities and hand washing facilities;
- h) the location of a break room;
- i) the location of lobby or area where non-agents can access;
- j) the location of the areas to be used for loading and unloading of cannabis products for transportation; and
- k) the location of all cameras and external lights.

















**Submit the proposed cannabis 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**
- f) Visitor policy**
- g) Description of backup power source and SOP for power outage.**







**Describe the proposed cannabis facility's Inventory Control System (ICS) and detail the procedures the facility will employ to meet the ICS requirements of Utah Code 4-41a-103 and Utah Administrative Rule related to inventory control. Include a description of how the facility will comply with section 4-41a-2 and use the state Electronic Verification System to track facility agents.**



**Does the licensee complete Research and Development**

**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.**



**Does this facility process or store hemp?**

**Provide procedure for the use of cannabinoid isolate, outlined R66-2-7(5)**

**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.**















**Provide the proposed cannabis facility's waste disposal plan. Explain how the facility will comply with Utah Code 4-41a-405 and Utah Administrative Rule related to waste disposal.**

**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.**



**List of equipment**



**List all product types that will be produced in the upcoming year. (e.g., Concentrate, Flower, Infused Edible)**

**Attach Standard Operating Procedures for each product produced. In each SOP, please include quality control procedures for each product**







































**List all extraction methods used at the facility. Include all solvents, chemicals, and equipment used. Please upload written SOPs.**

**Attach Standard Operating Procedures for each extraction method**





































**Is the facility doing CBD to THC conversion?**

**Provide the processing facility's written plan and procedures to handle potential recalls in accordance with R66-2-15. Include:**

- a) The name(s) of person(s) designated as recall coordinator(s);**
- b) Contact information for the designated recall coordinator(s);**
- c) How affected parties will be notified; and**
- d) A written procedure with specifics of what to do in case of a product recall.**









**Submit the facility's plan and procedure to dispose of product that fails quality assurance testing. A destruction plan must be written for every product type produced at the facility and must comply with federal laws, Utah Code 4-41a-405, and Administrative Rule R66-2-17.**

**Provide outline to meet requirement 21 CFR 111, "Current Good Manufacturing, Packaging, Labeling, or Holding Operation for Dietary Supplements"**





**Submit proof of a performance bond issued by a surety business, or proof of a liquid cash account in the required amount with a financial institution: Each Cultivation Facility \$100,000; each Tier 1 and Tier 2 Processing Facility and Testing Lab \$50,000.**

**All scales must be certified as outlined in Utah Administrative Rule 66-2-4 (8) and 66-2-4 (4). Visit the Weights and Measures Program for more information about how to certify scales.**

**Upload a copy of the 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 Production Establishment.**

**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.**





**Provide the facility's plan and procedures to have a representative sample of cannabis products tested by an independent testing laboratory to determine if the product is safe for human consumption.**

**Submit proof of registration as a Manufactured Food Establishment with UDAF's Regulatory Services.**

## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#), Talon Natural Support DBA: Pure Plan \_\_\_\_\_ (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):

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:

Not only do we have trade secrets and formulations, we have security and safety of our staff and products within the building.

Signed: Trent Weisenheimer

On behalf of (company): Talon Natural Support DBA: Pure Plan

Date: 02/02/2026









































































































































































































































































































































































































































































































































































































































































































## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#),  
\_\_\_\_\_ (company name) asserts a claim of business  
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- ☐ non-public financial statements
- ☐ specific employee name and contact information
- ☐ specific customer information, client lists, or subscription lists
- ☐ other (specify):

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.)

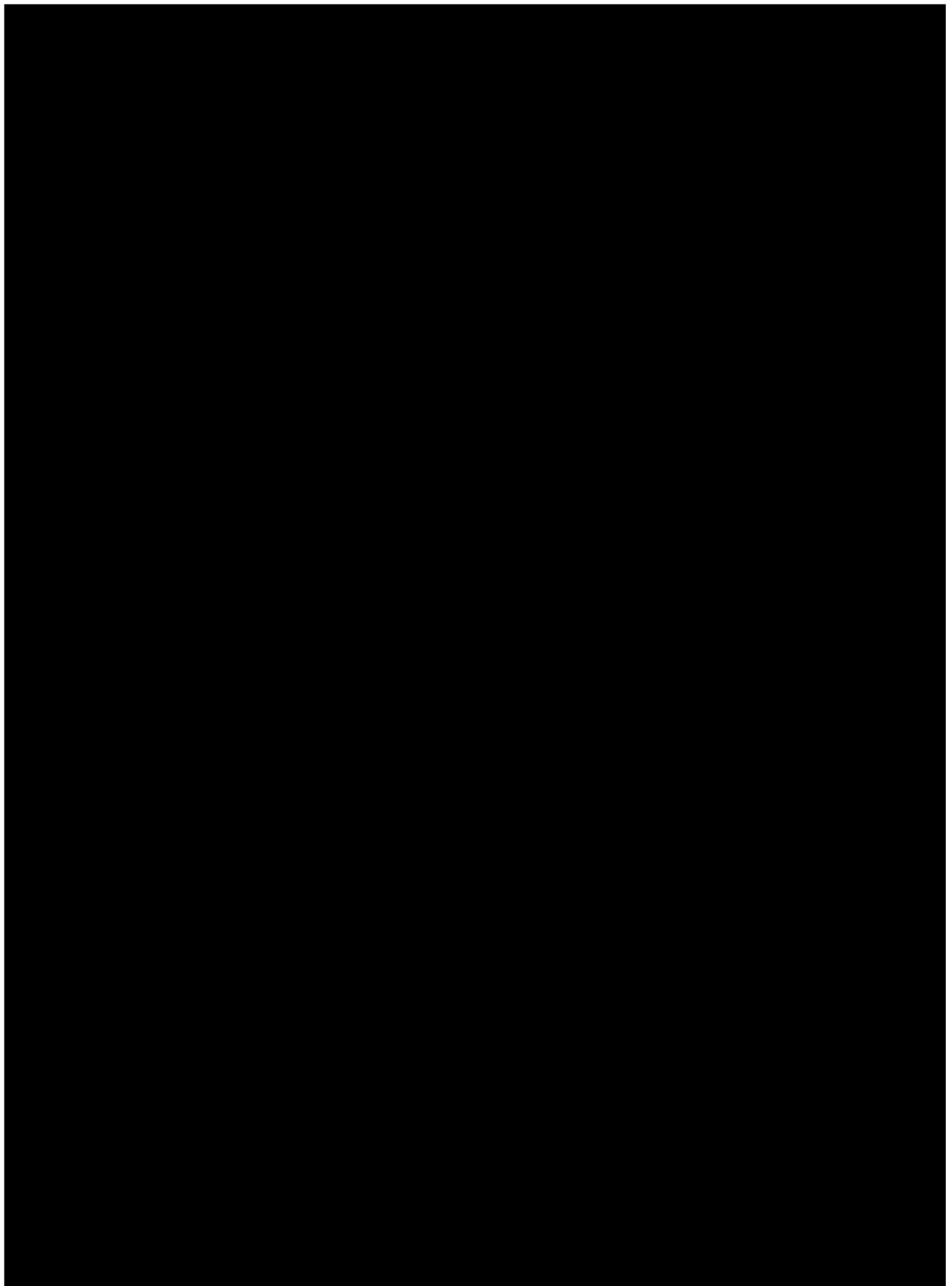
☐ commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary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

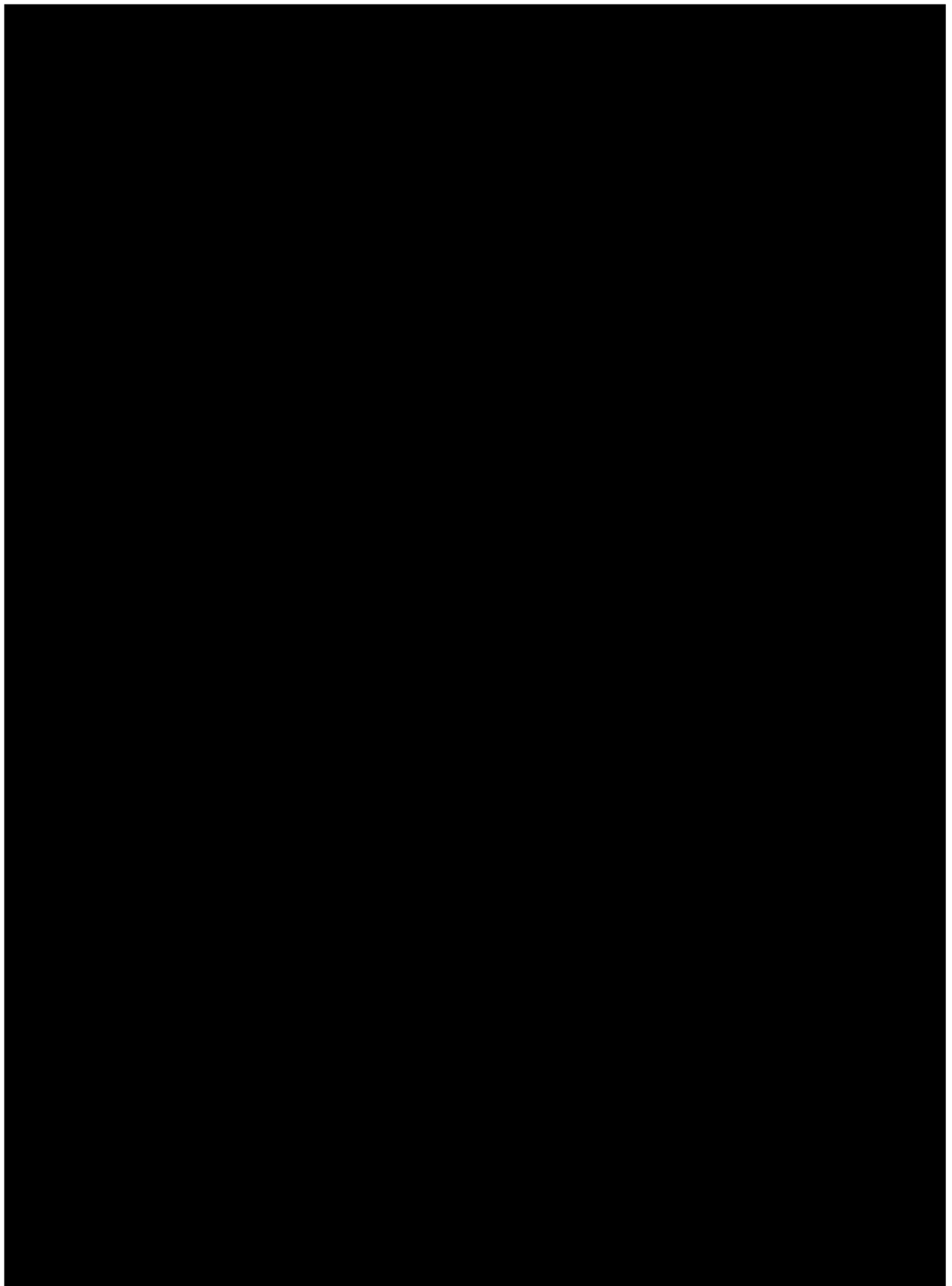
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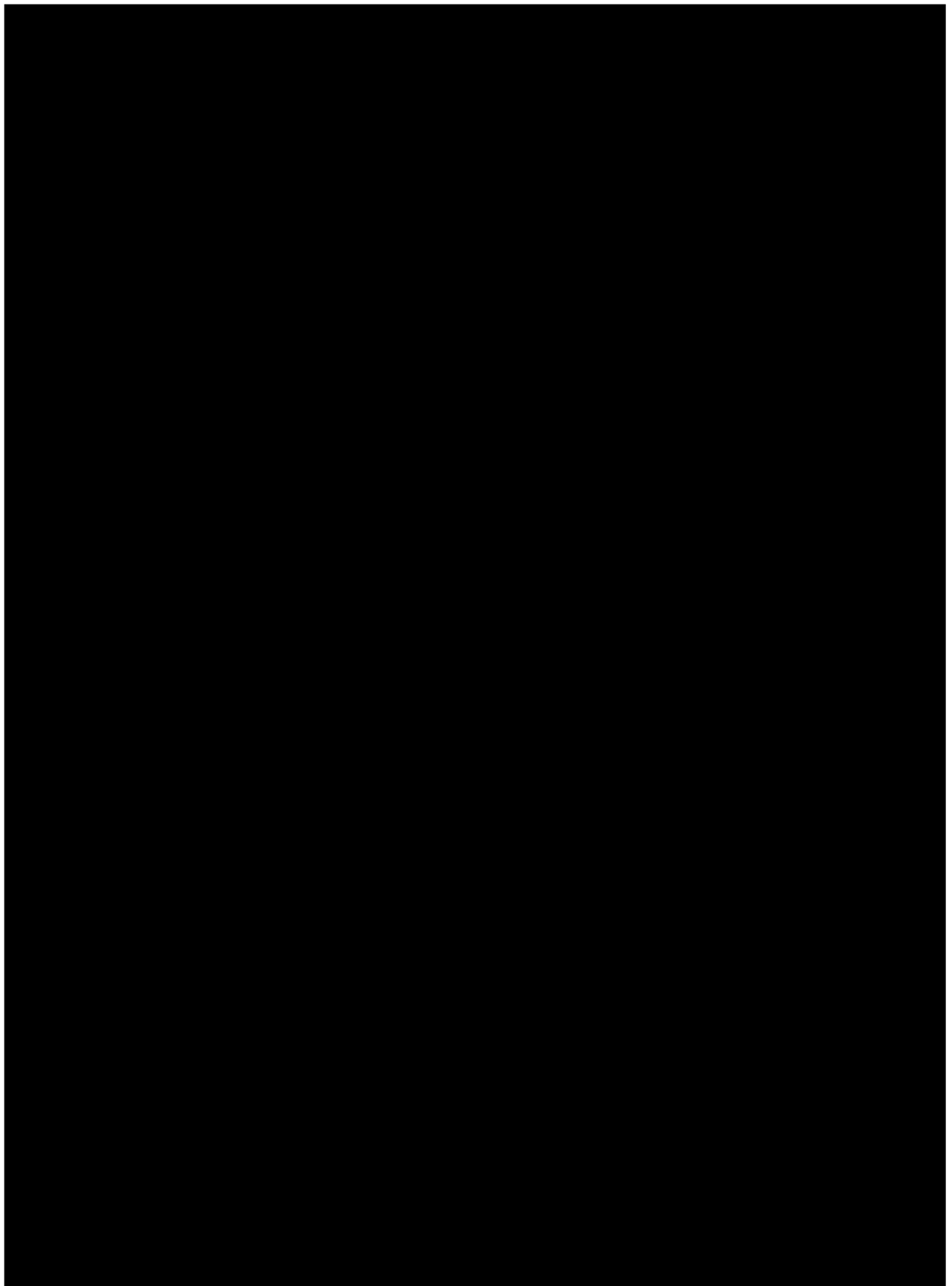
Signed: \_\_\_\_\_

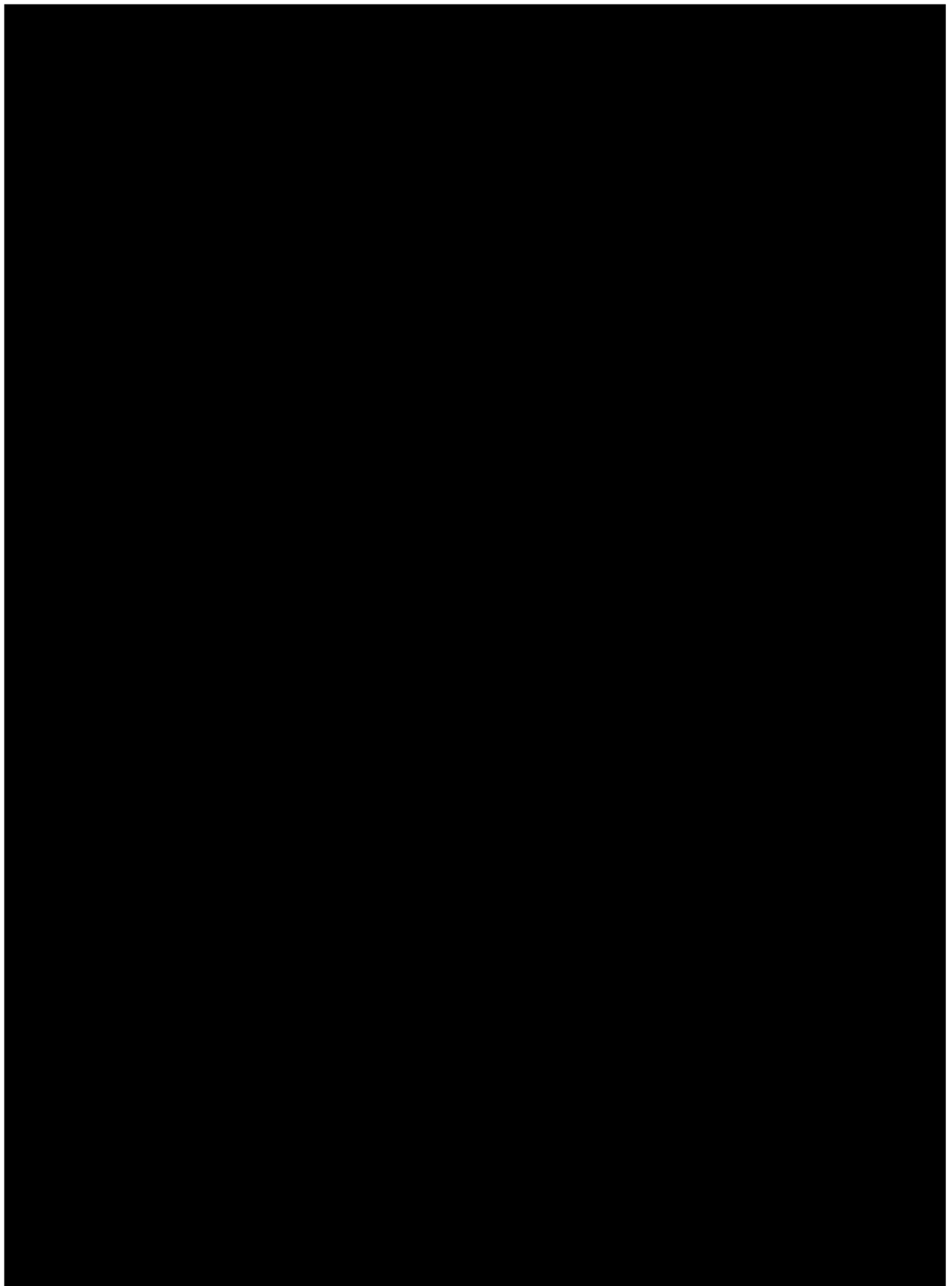
On behalf of (company): \_\_\_\_\_

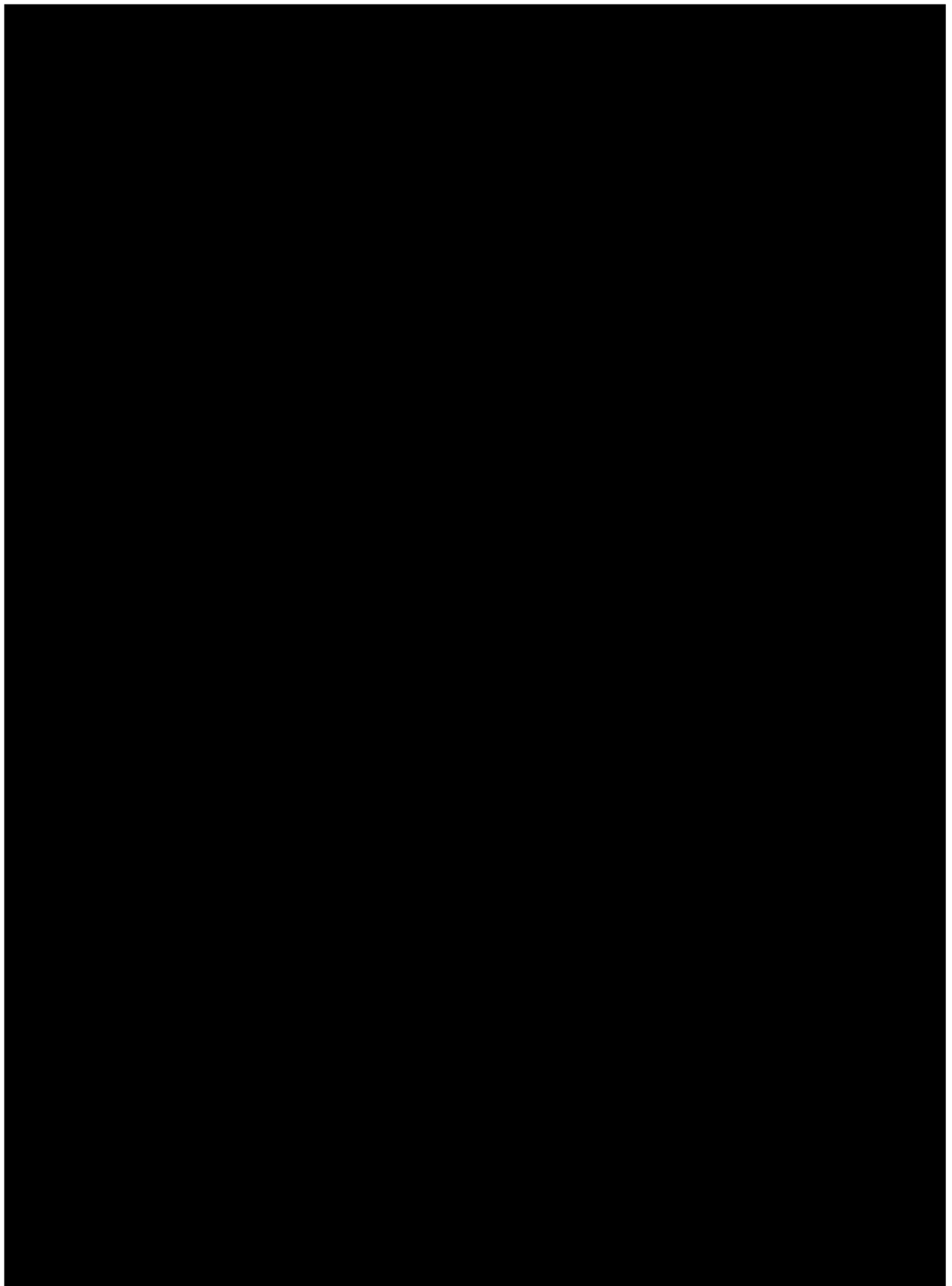
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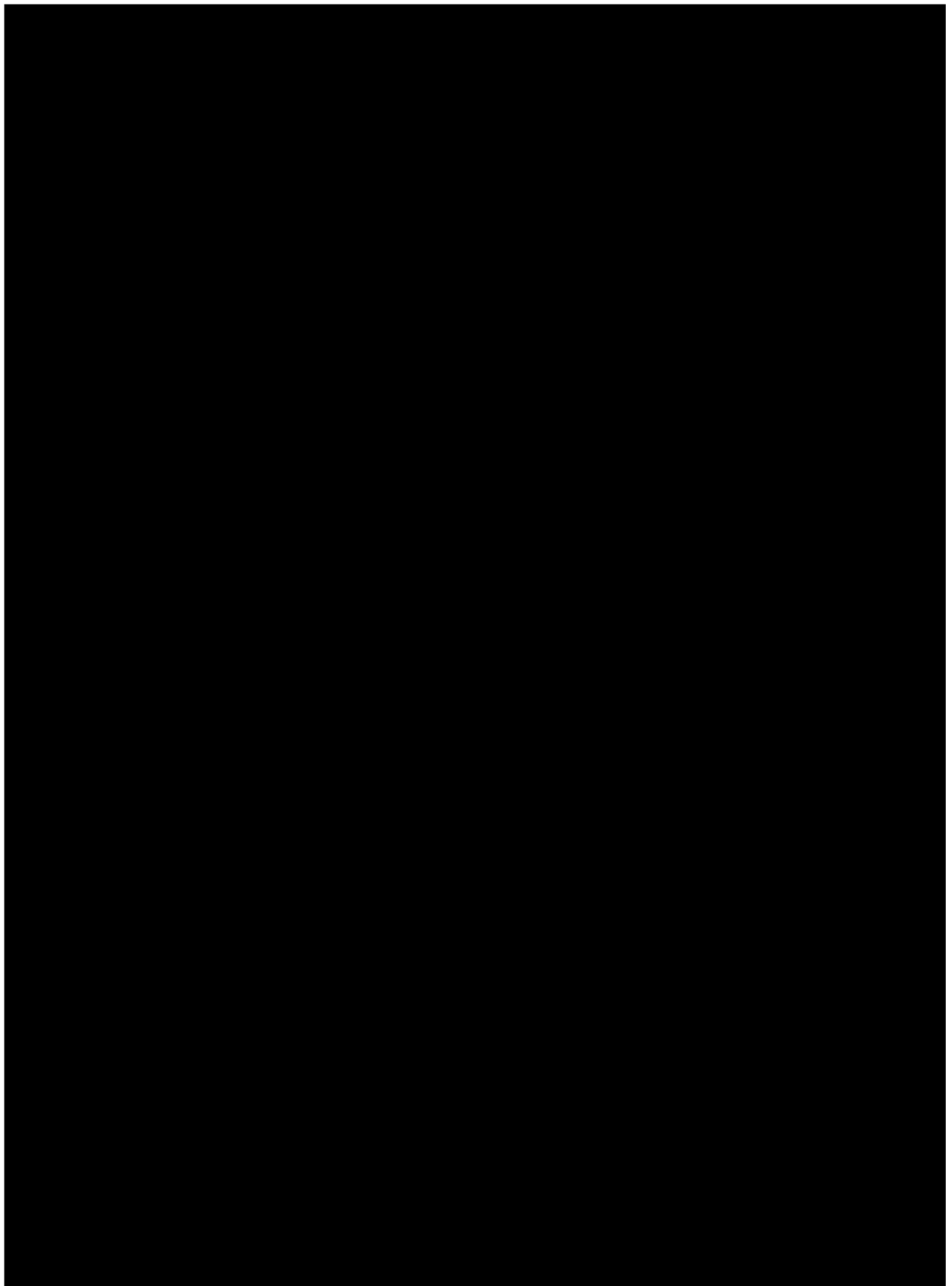




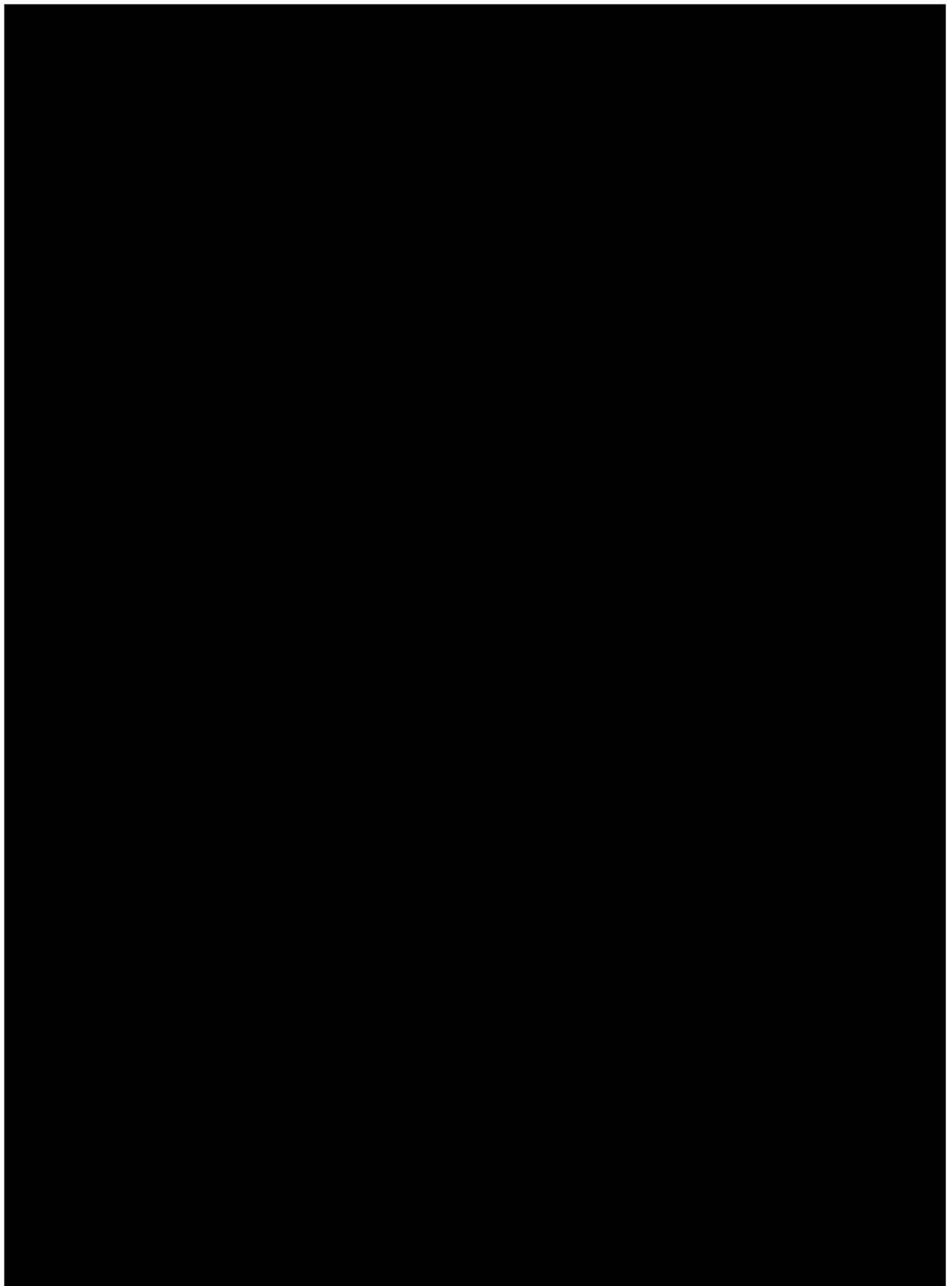


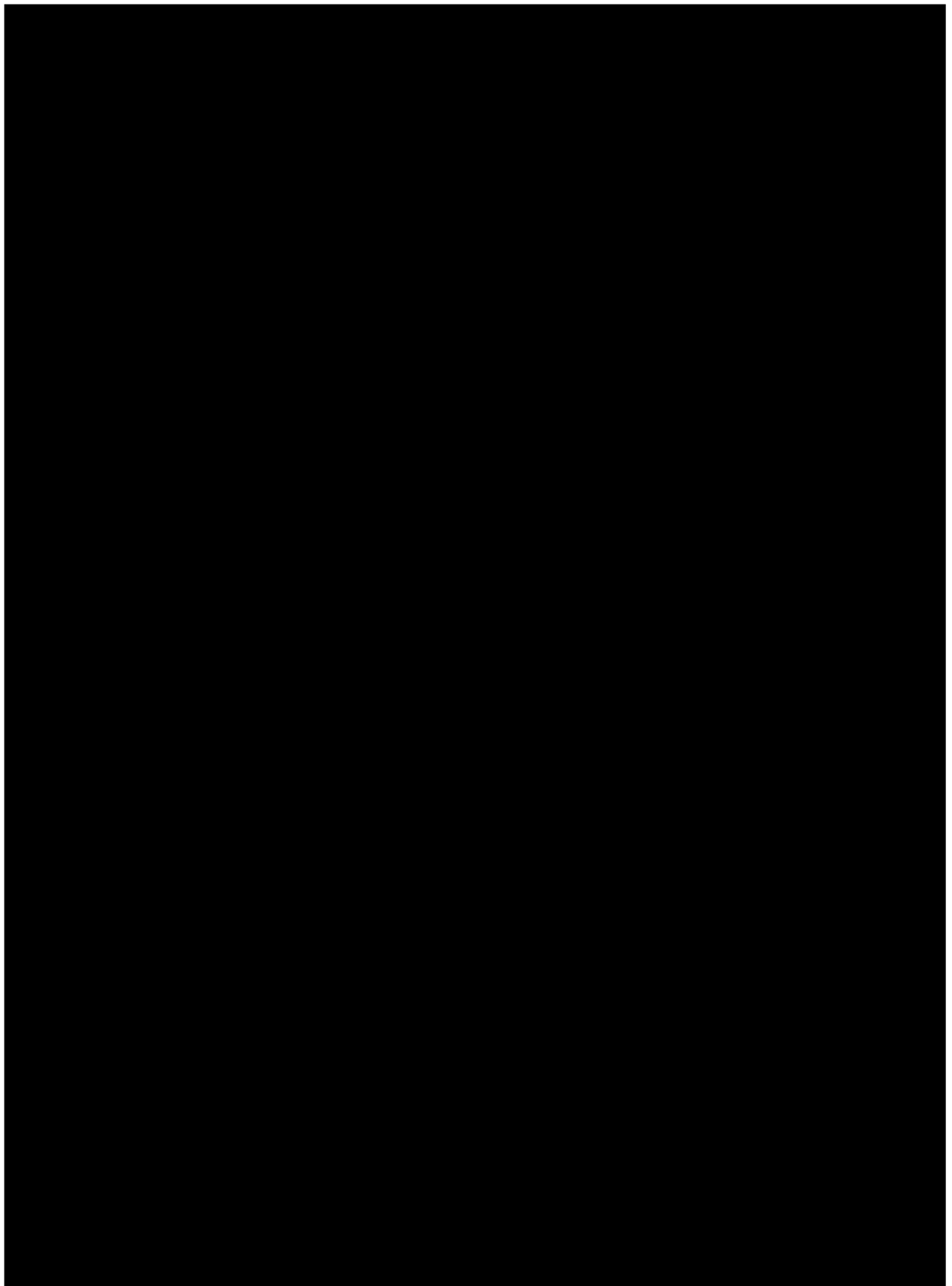


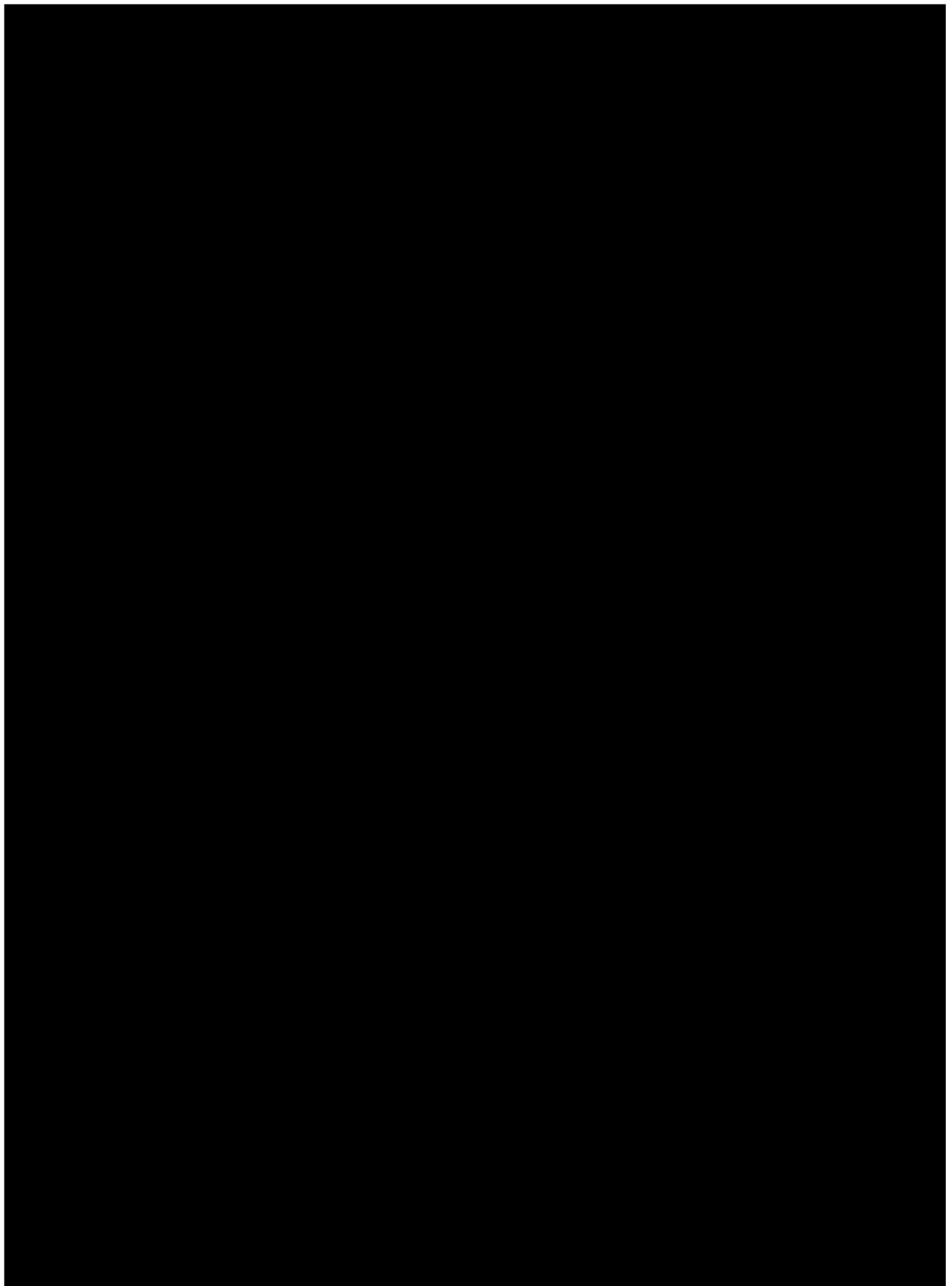


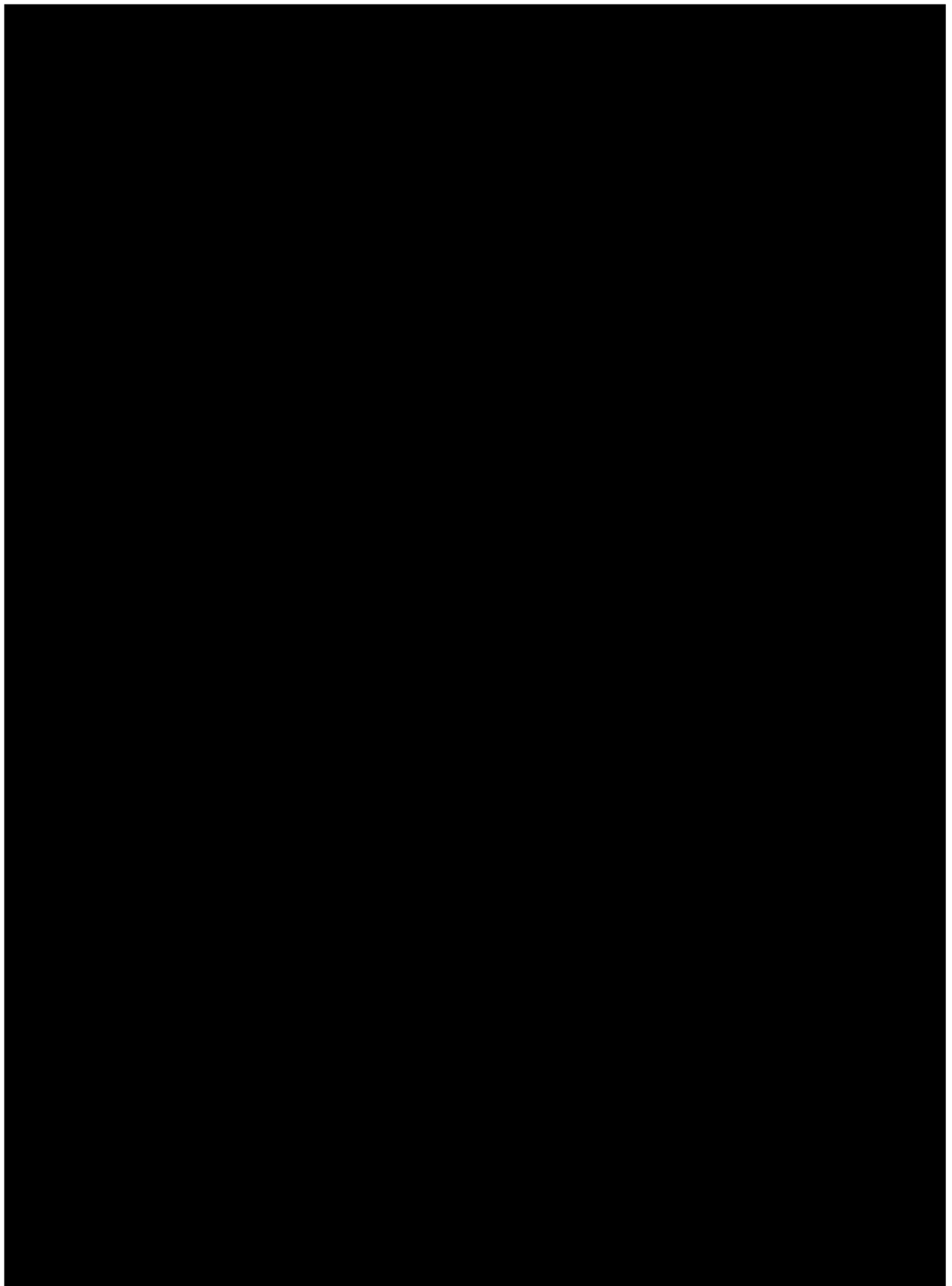


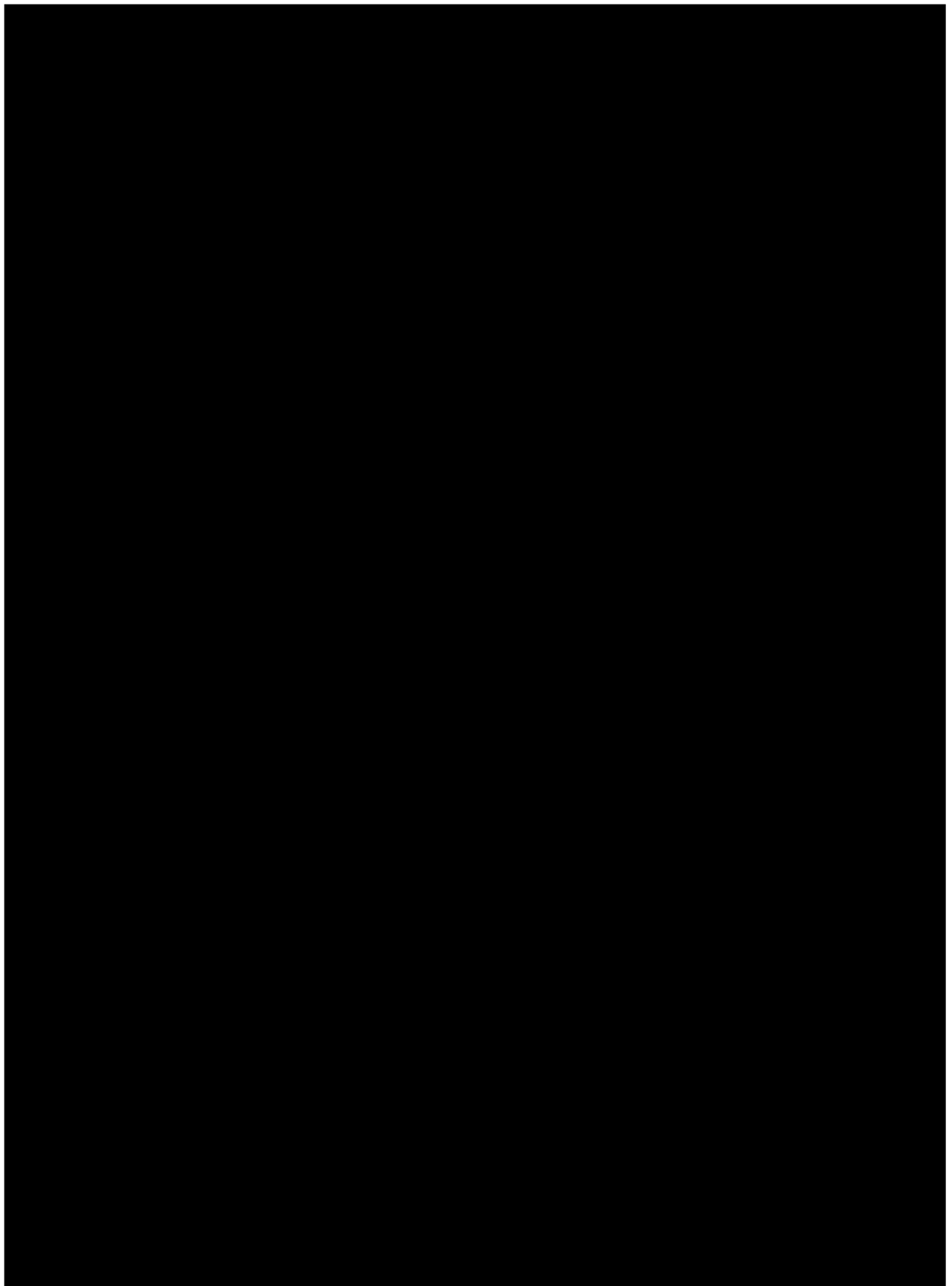


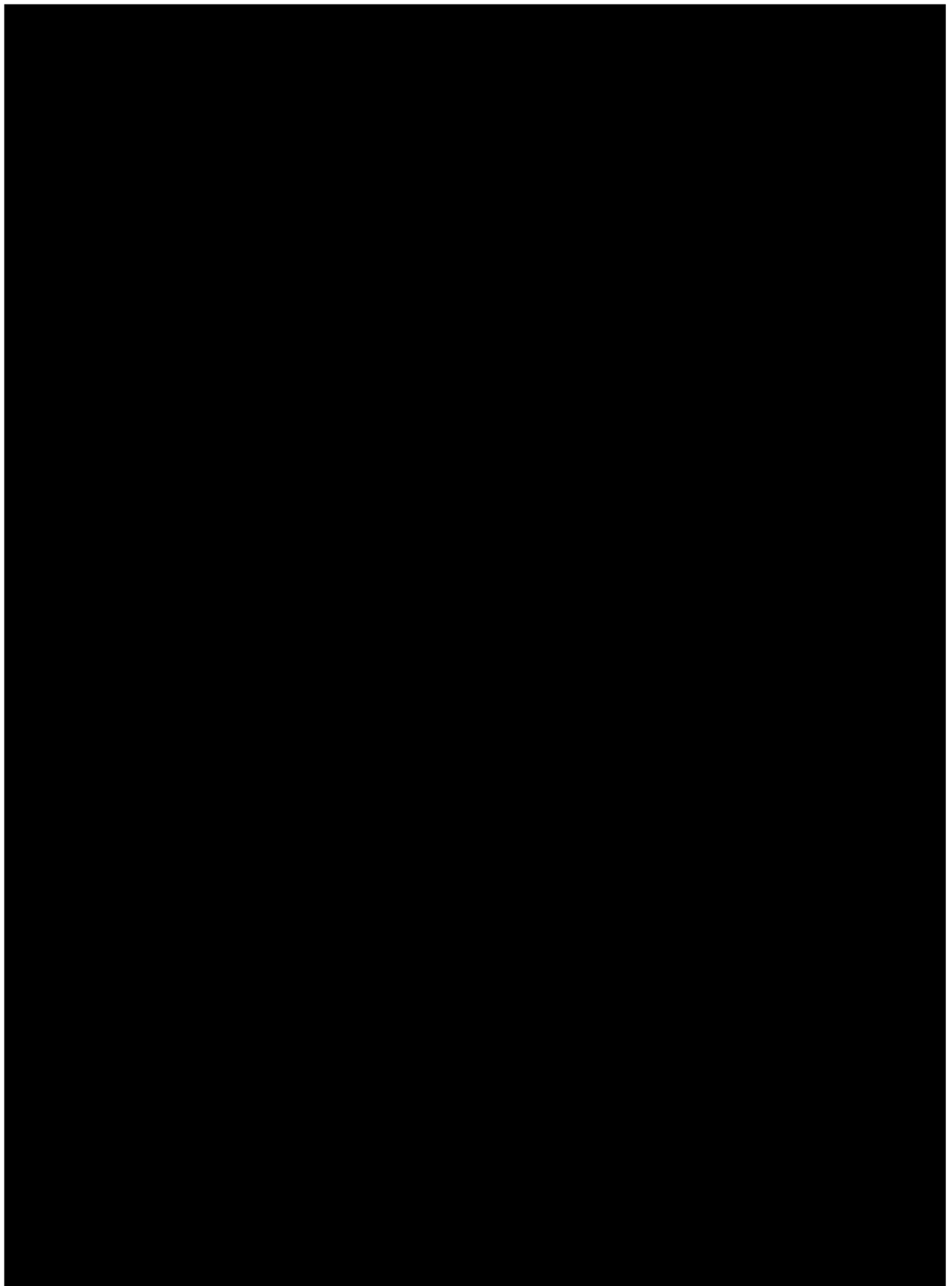


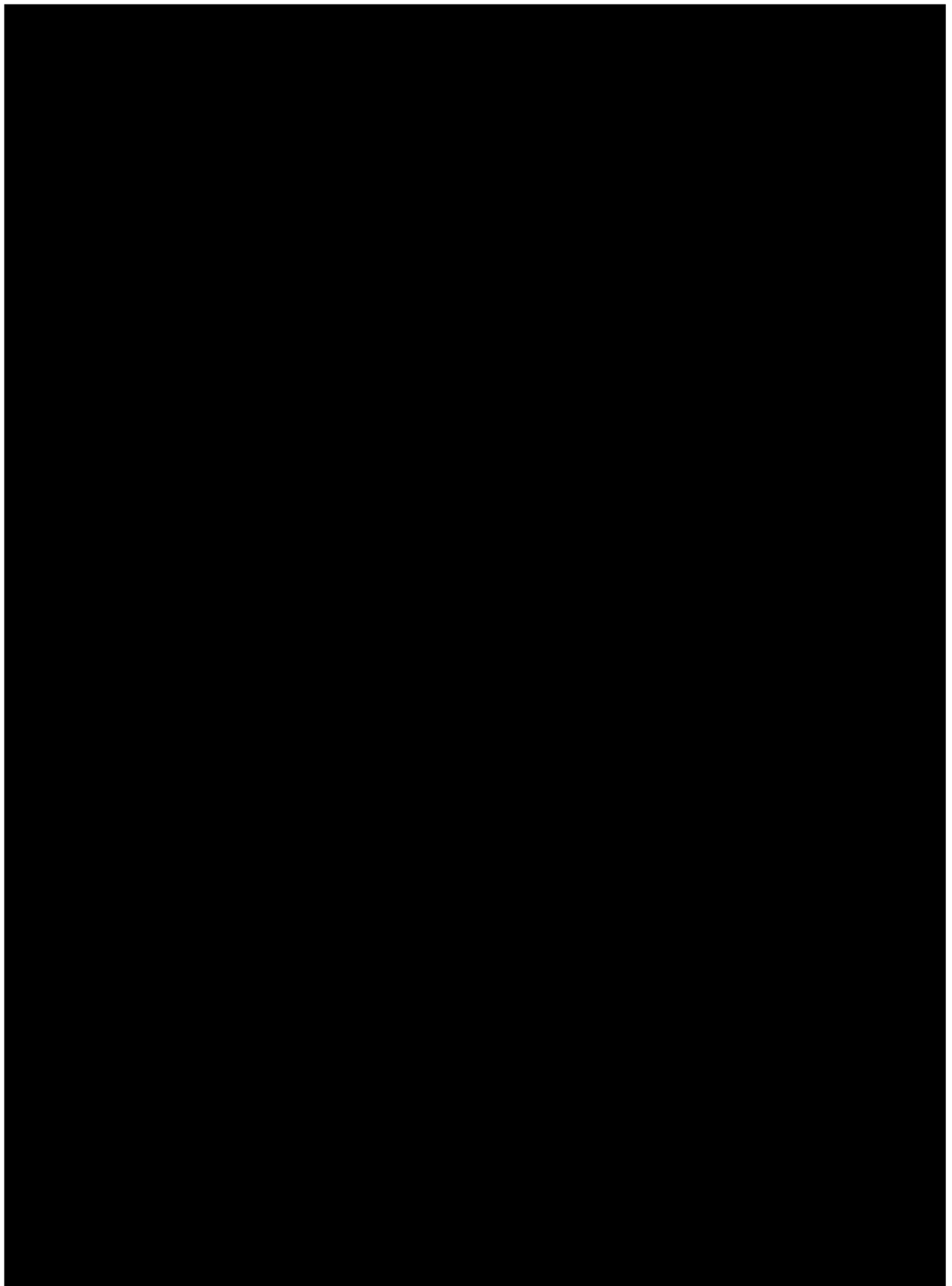


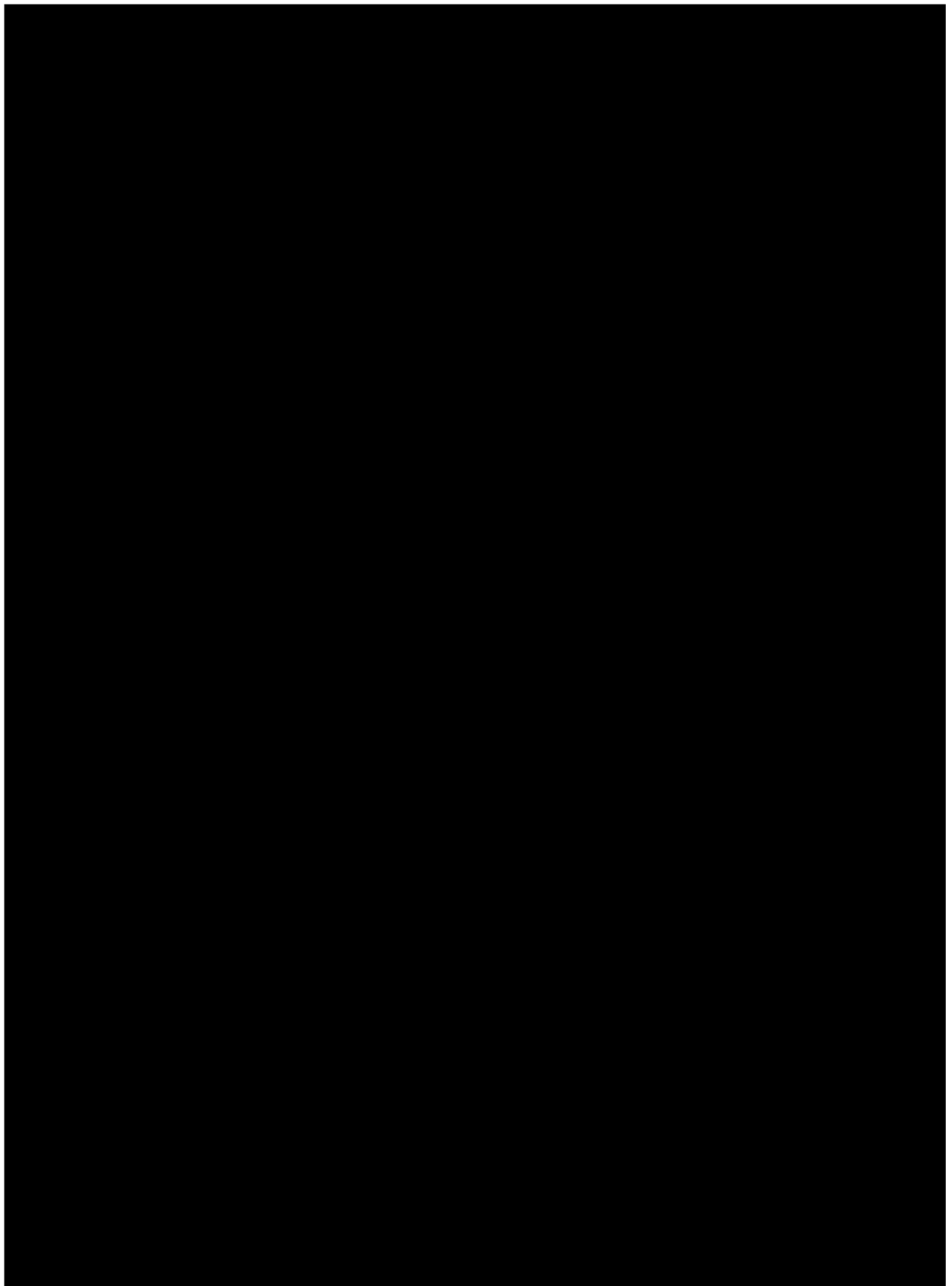




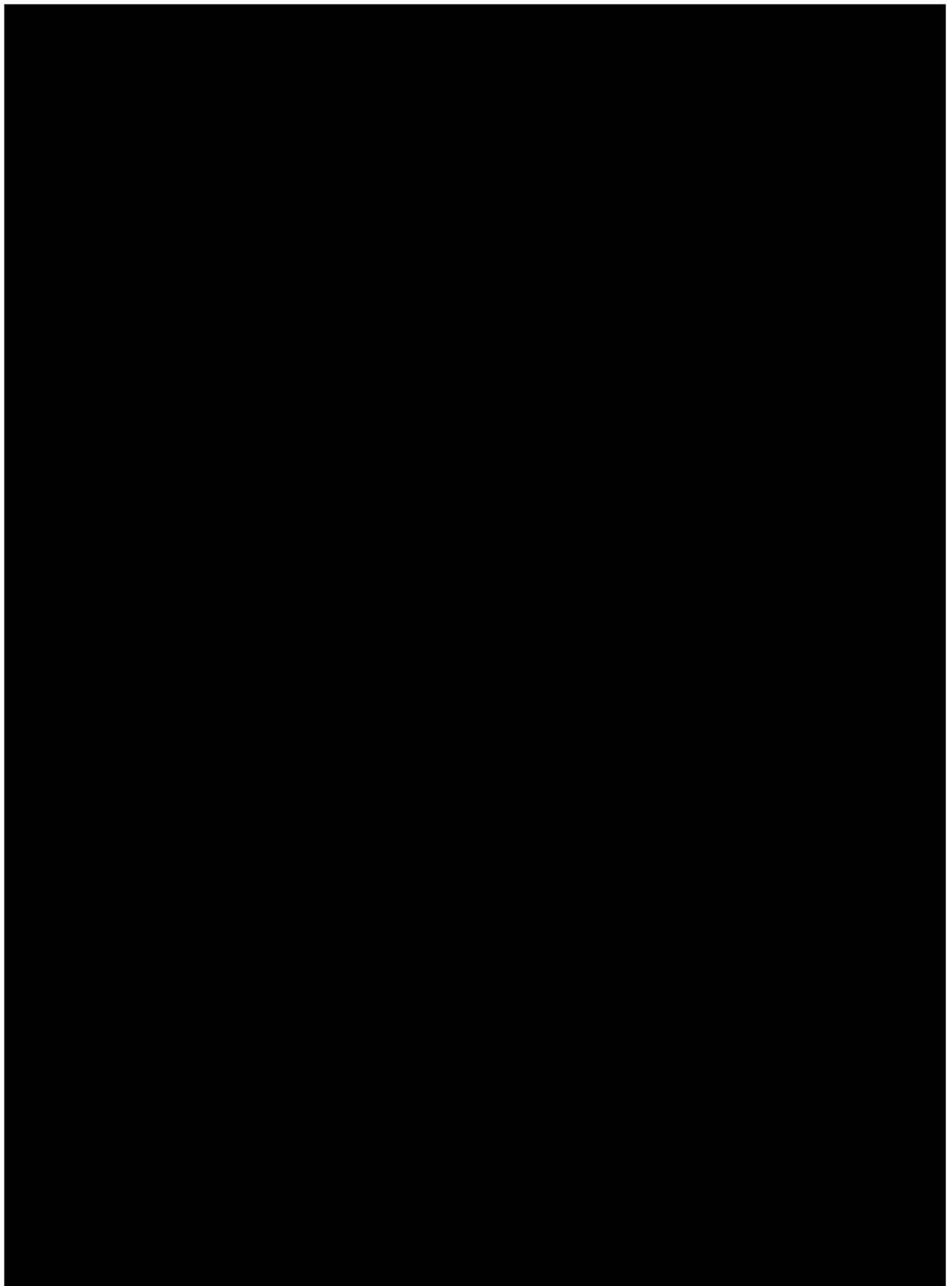


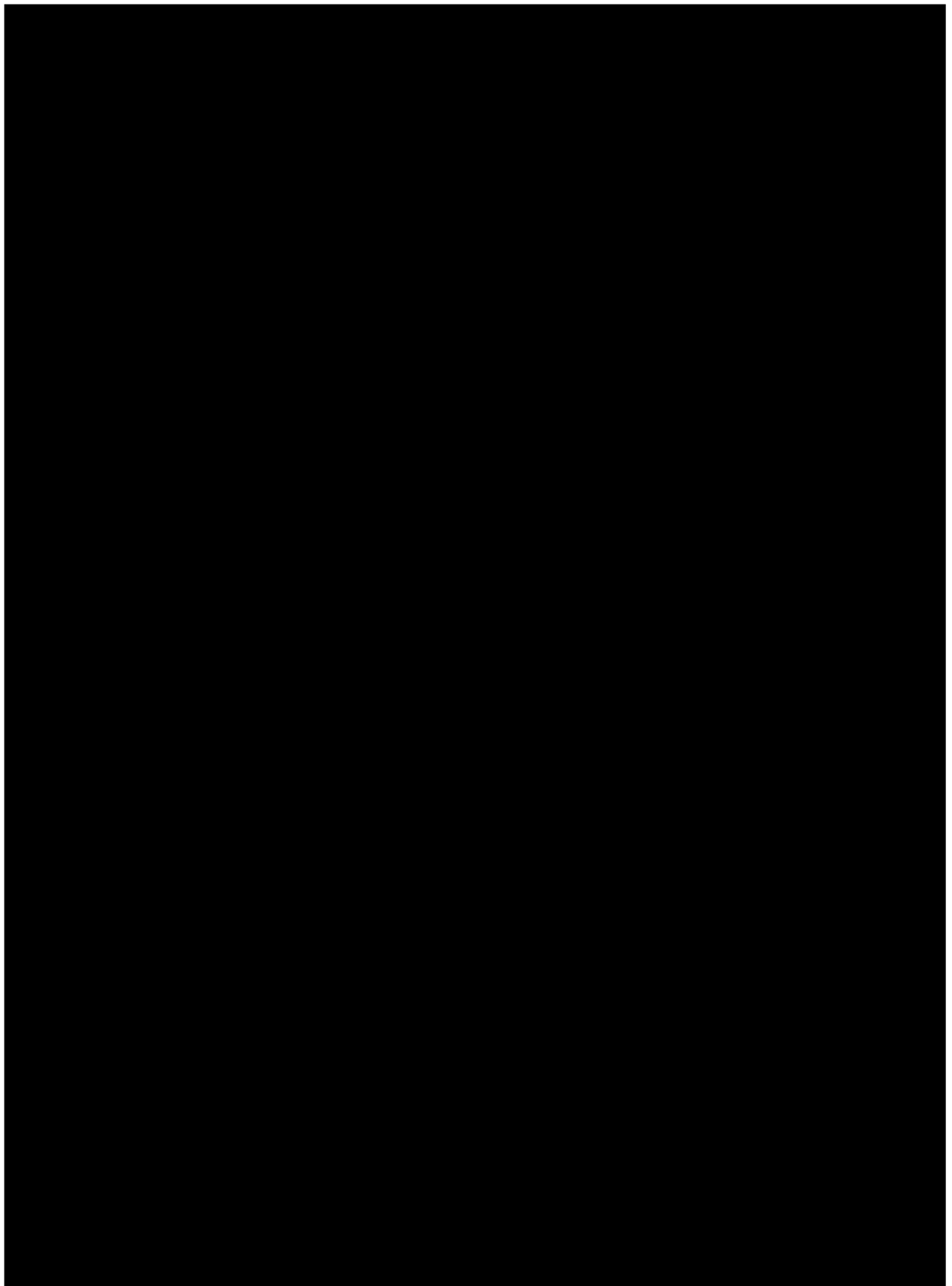


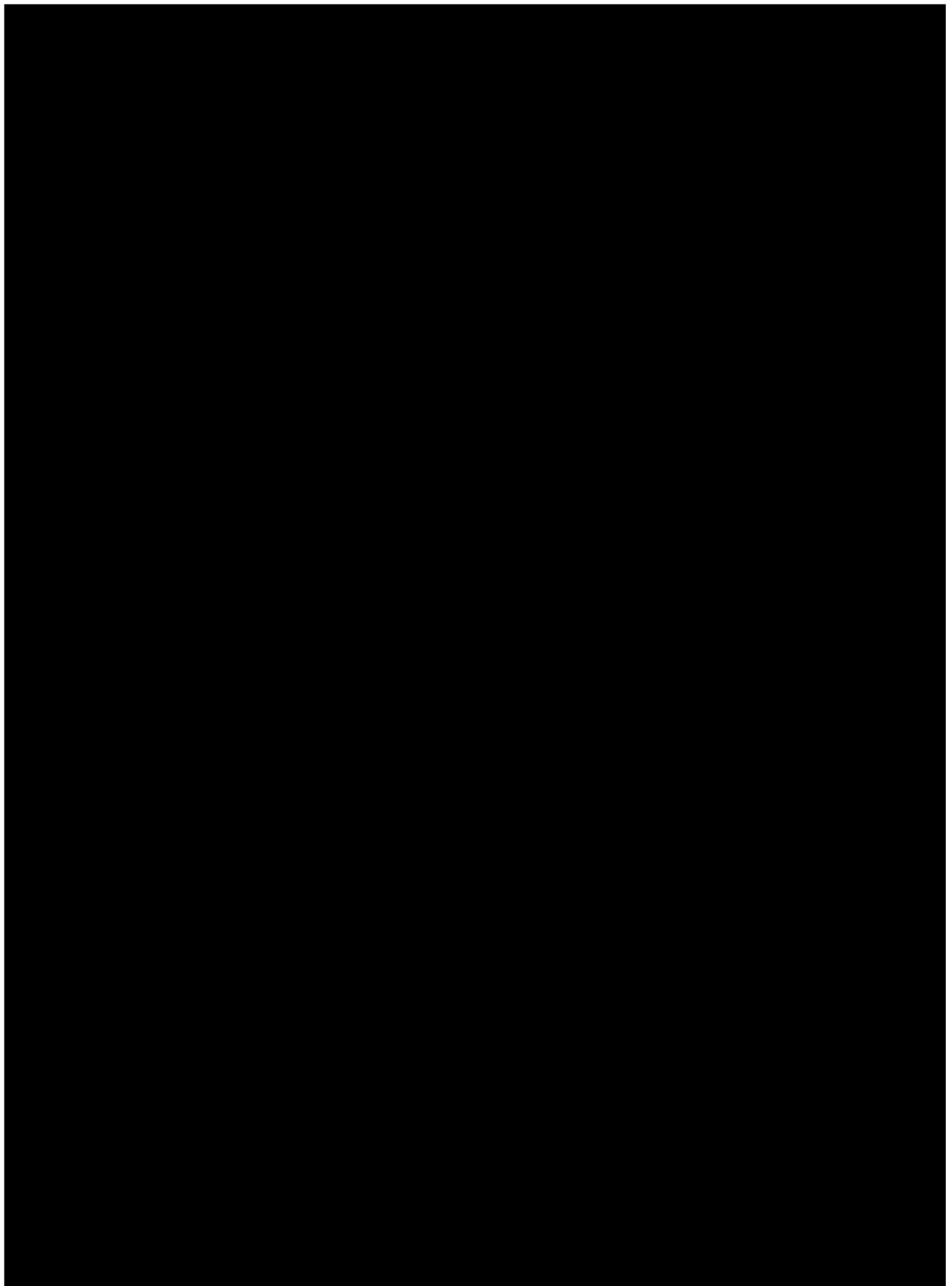


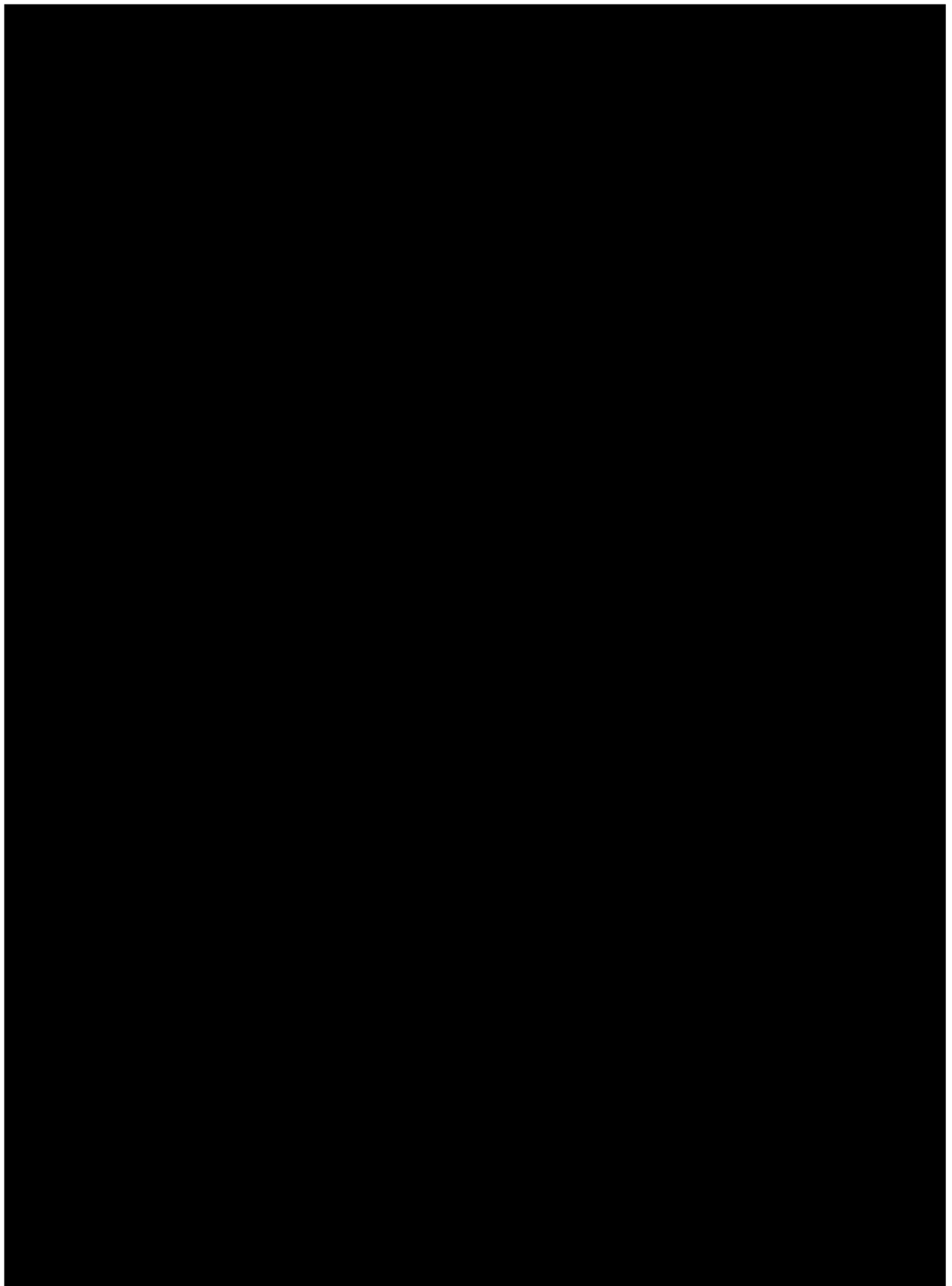


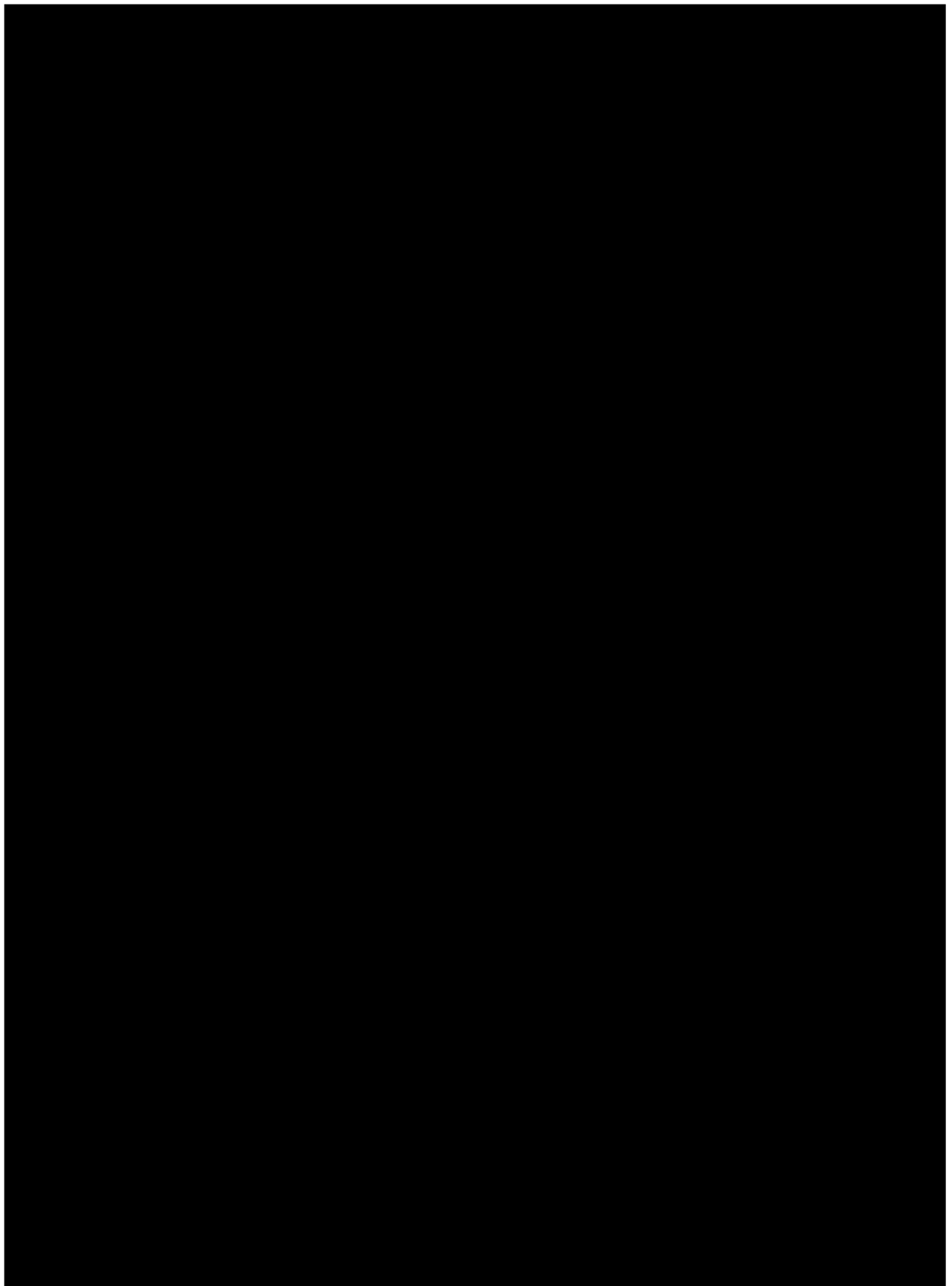


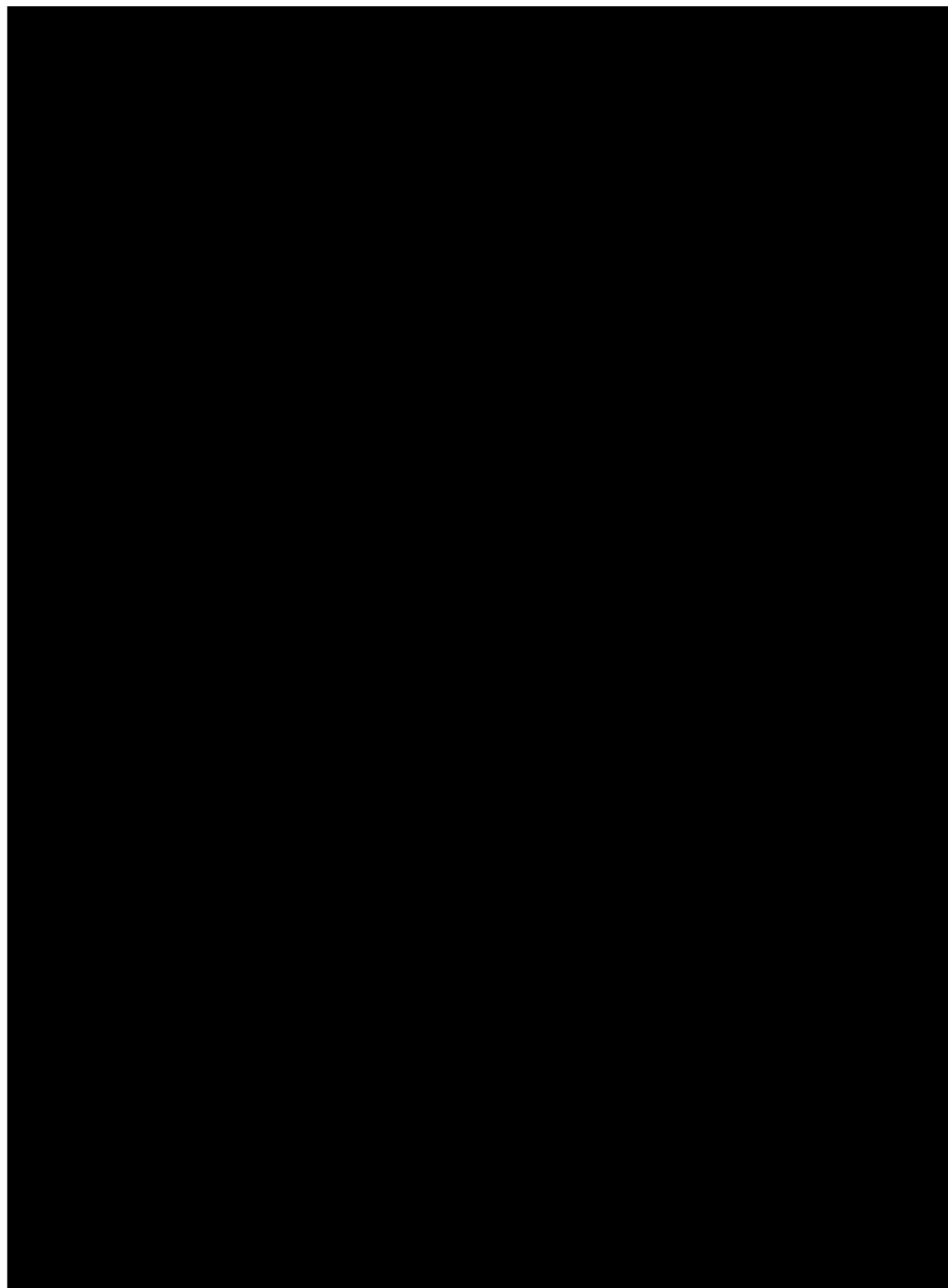


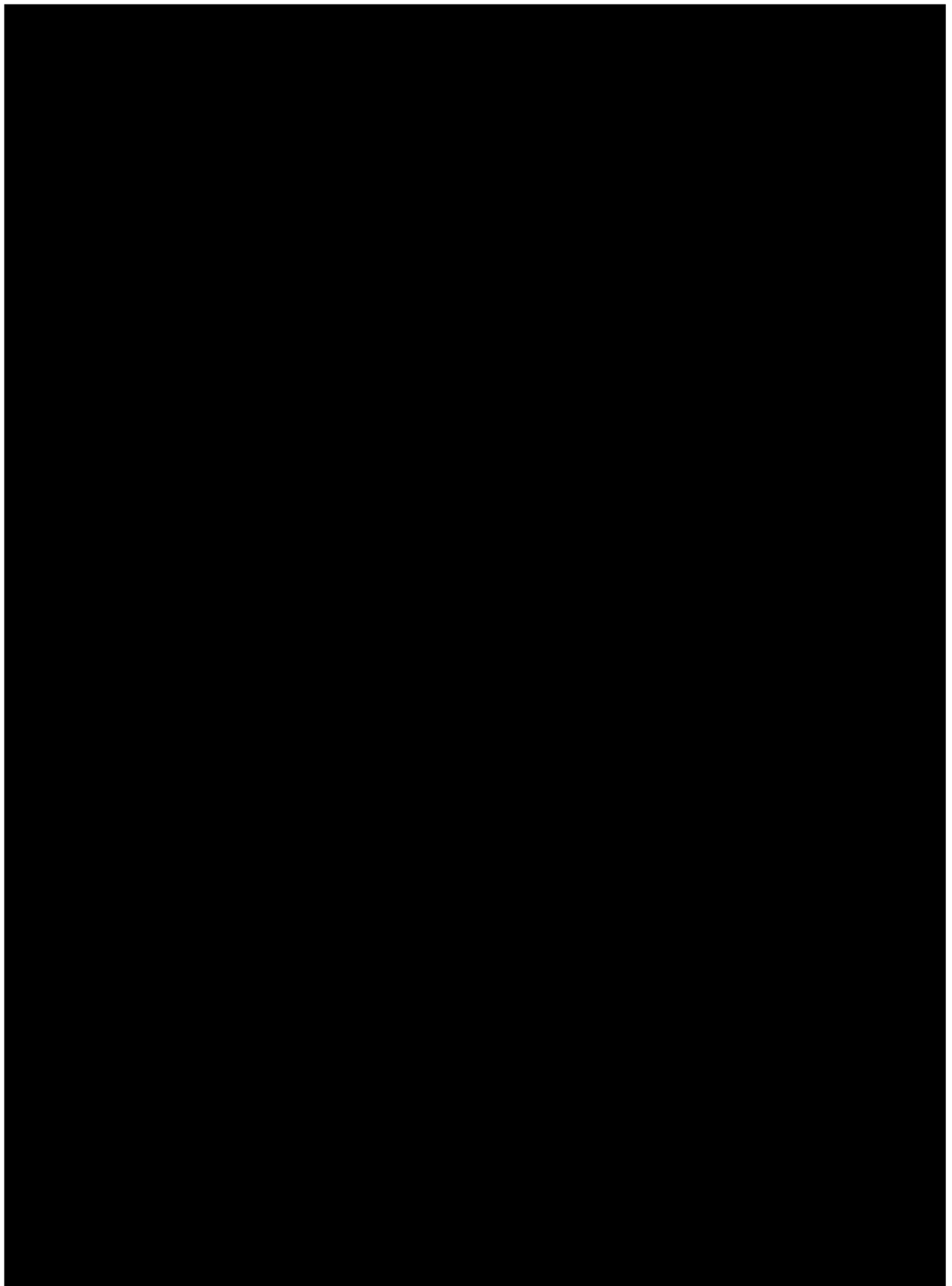


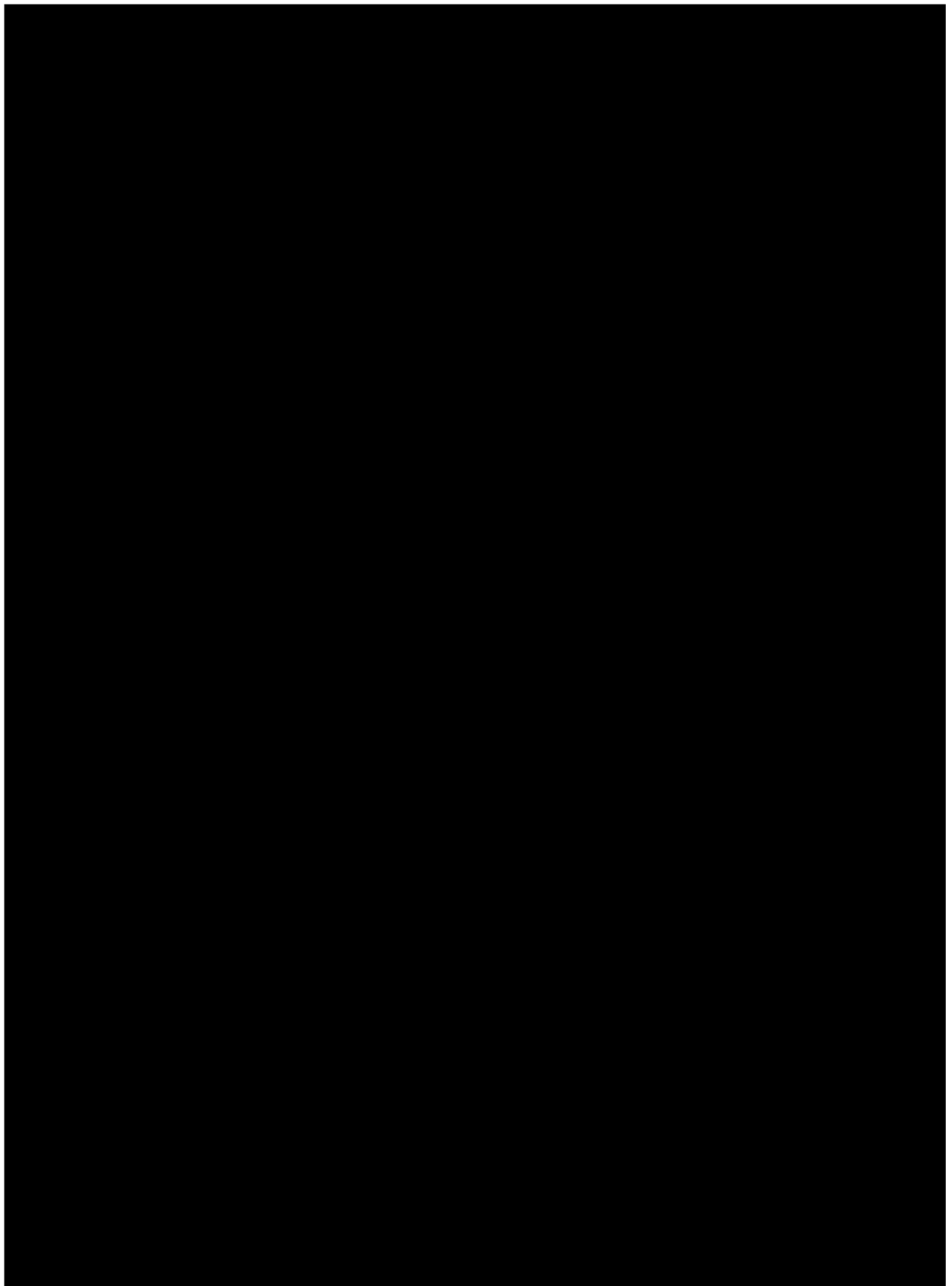




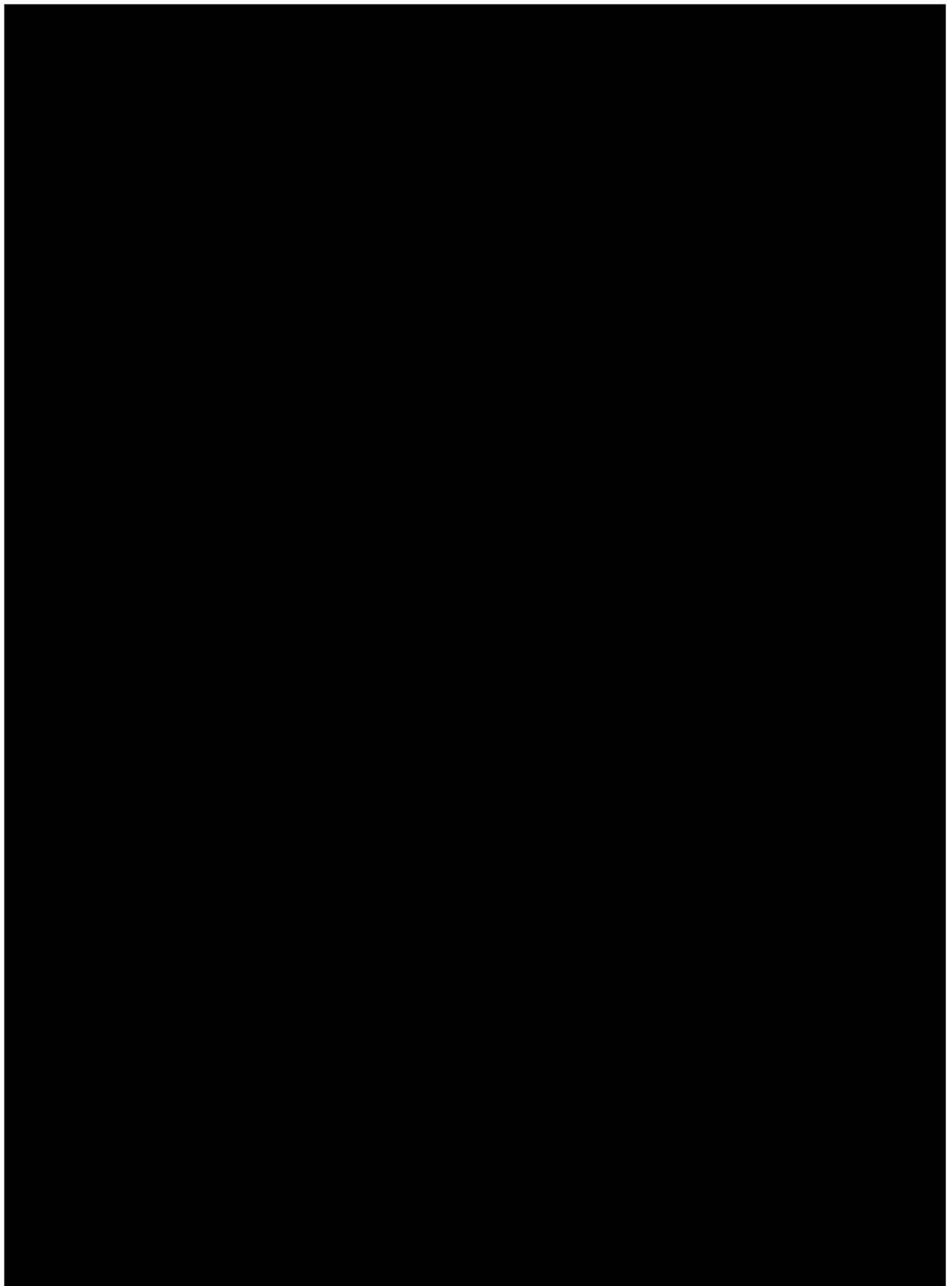


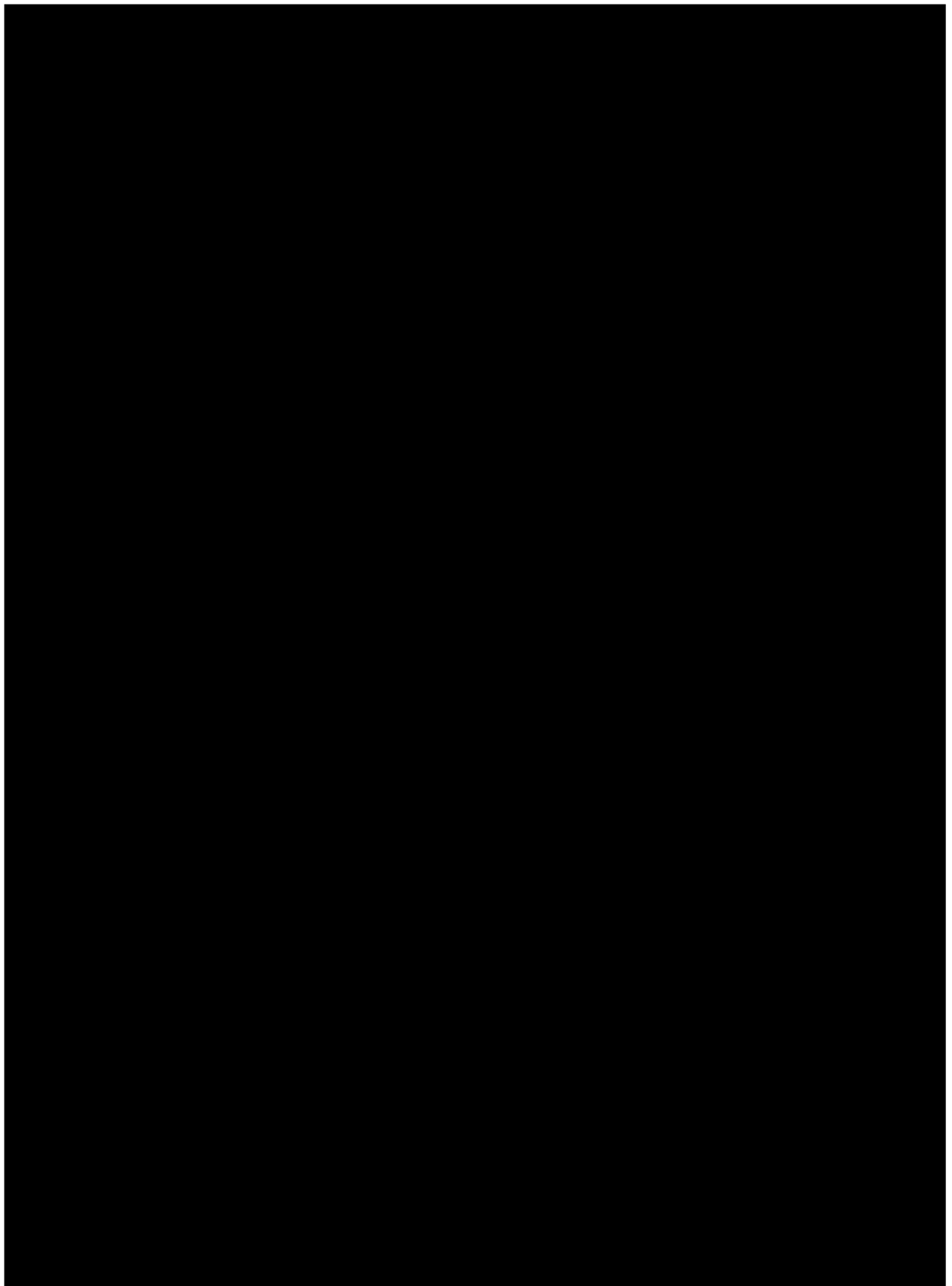


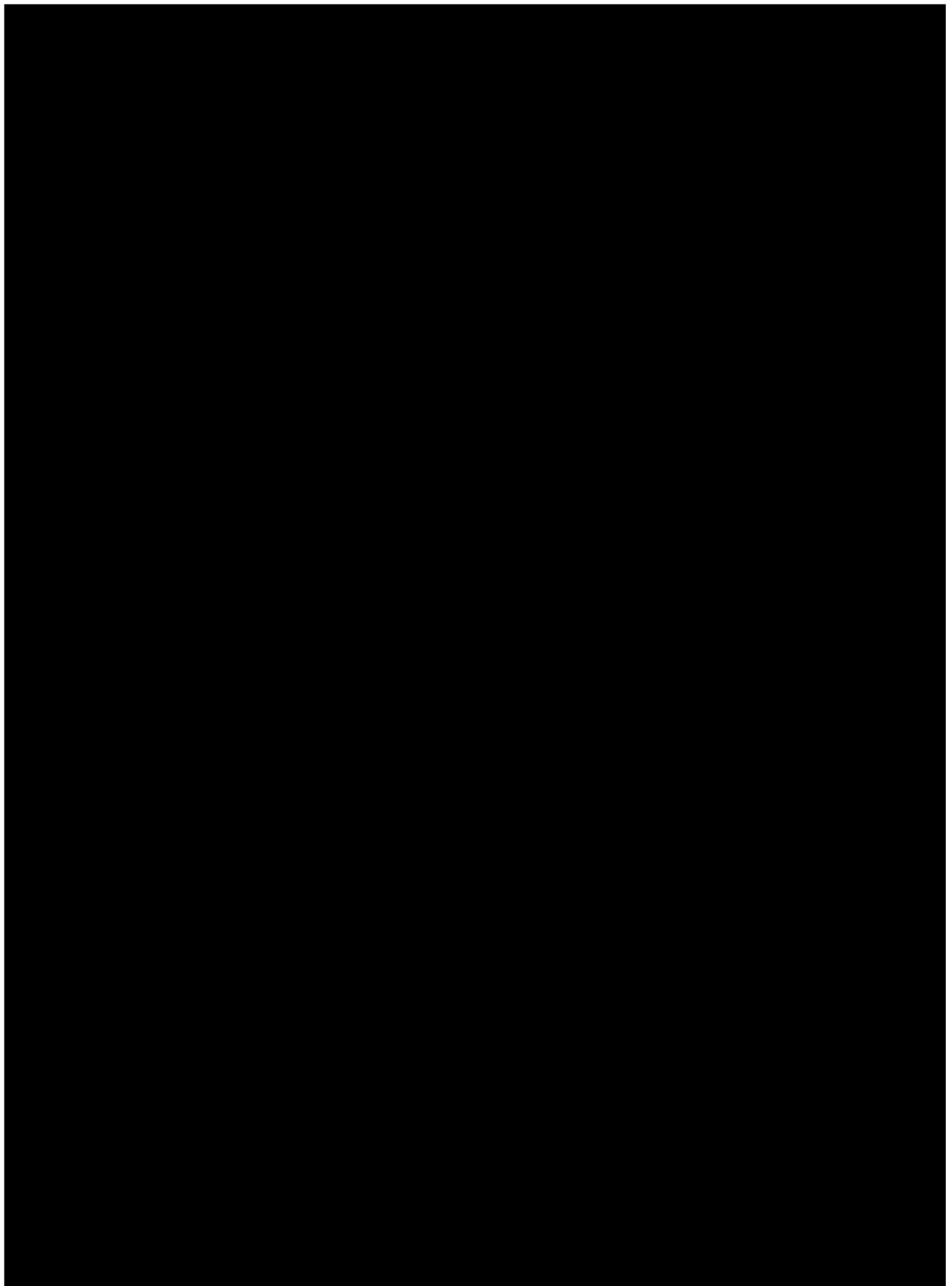


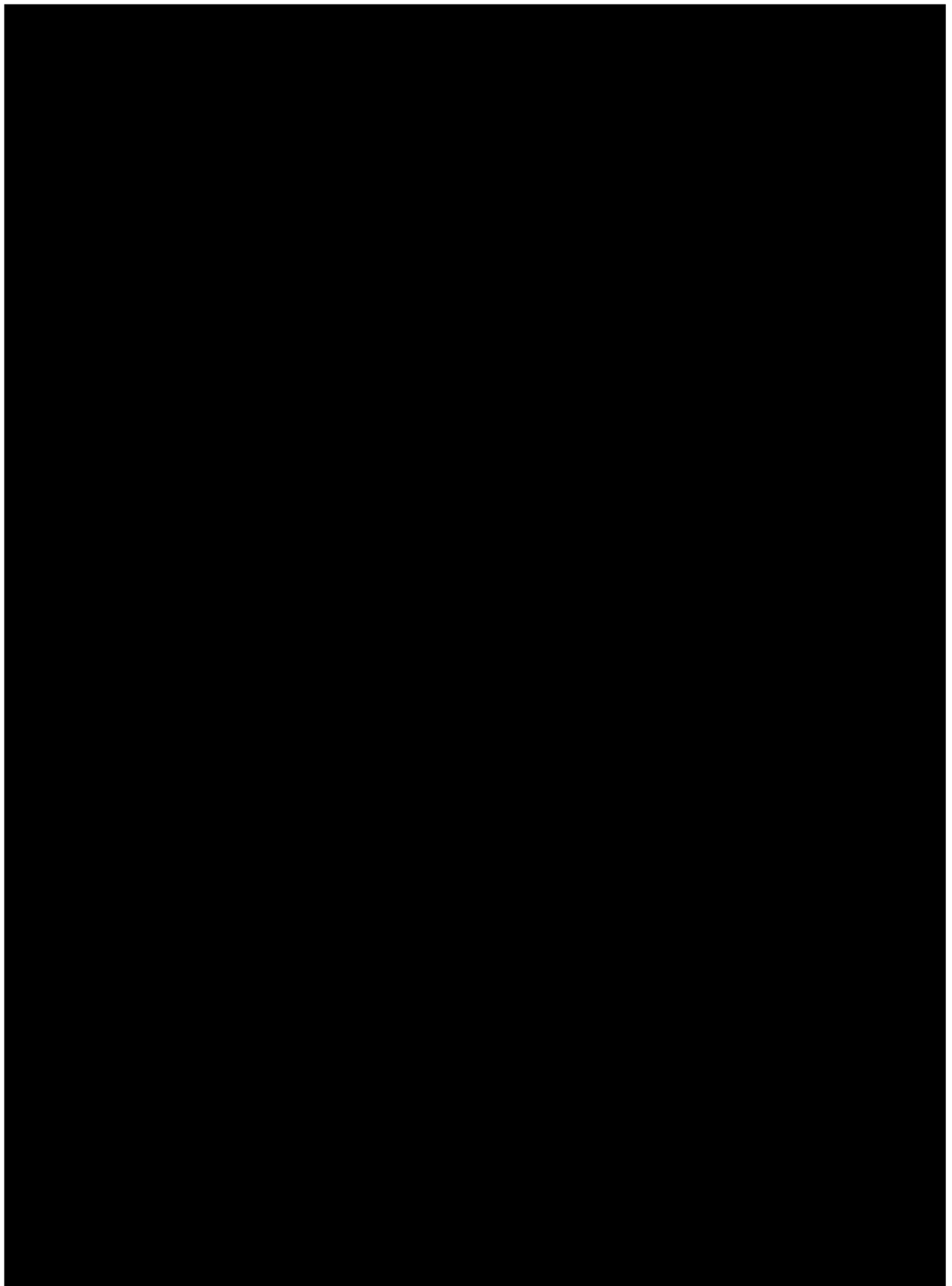


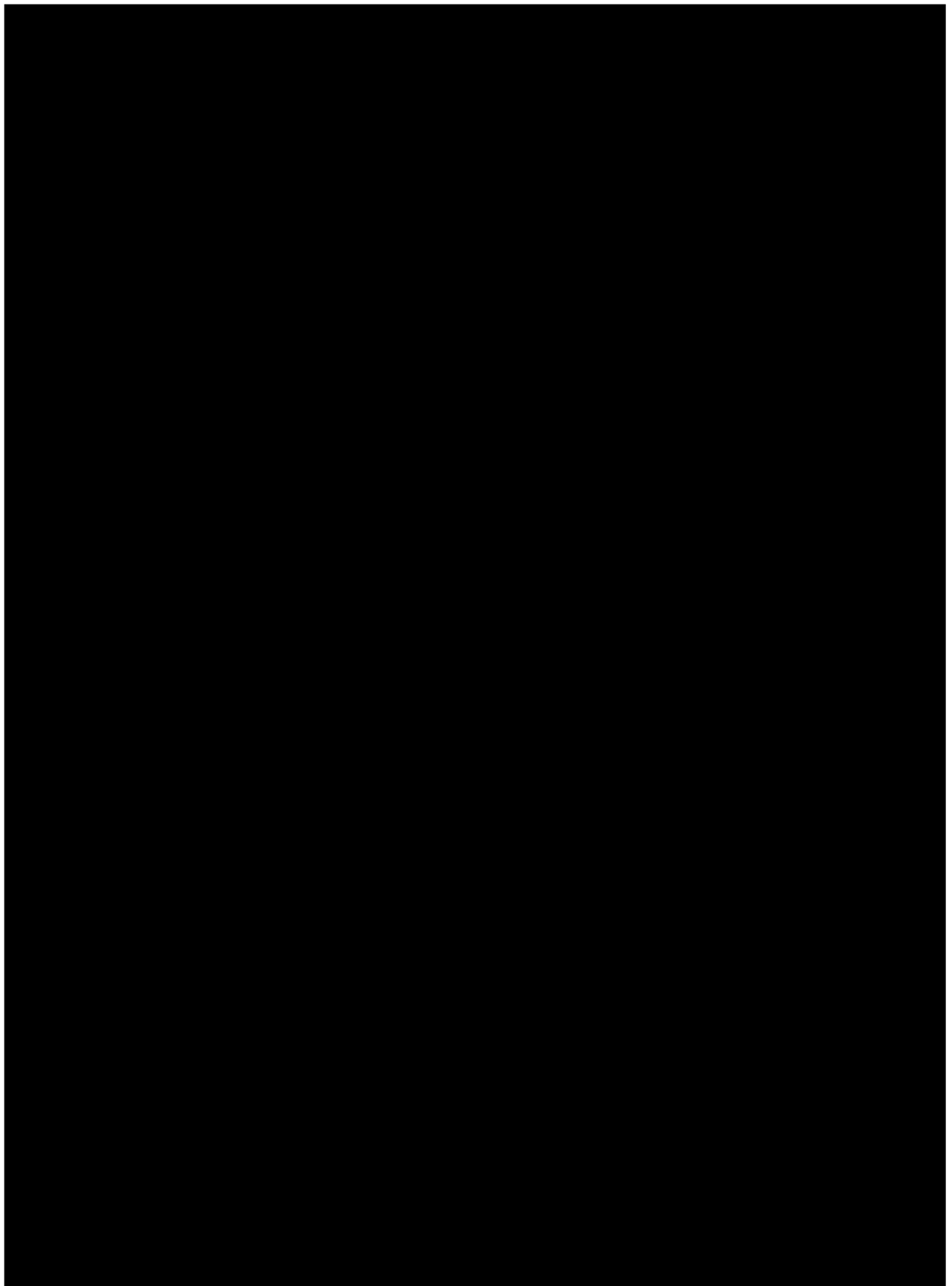


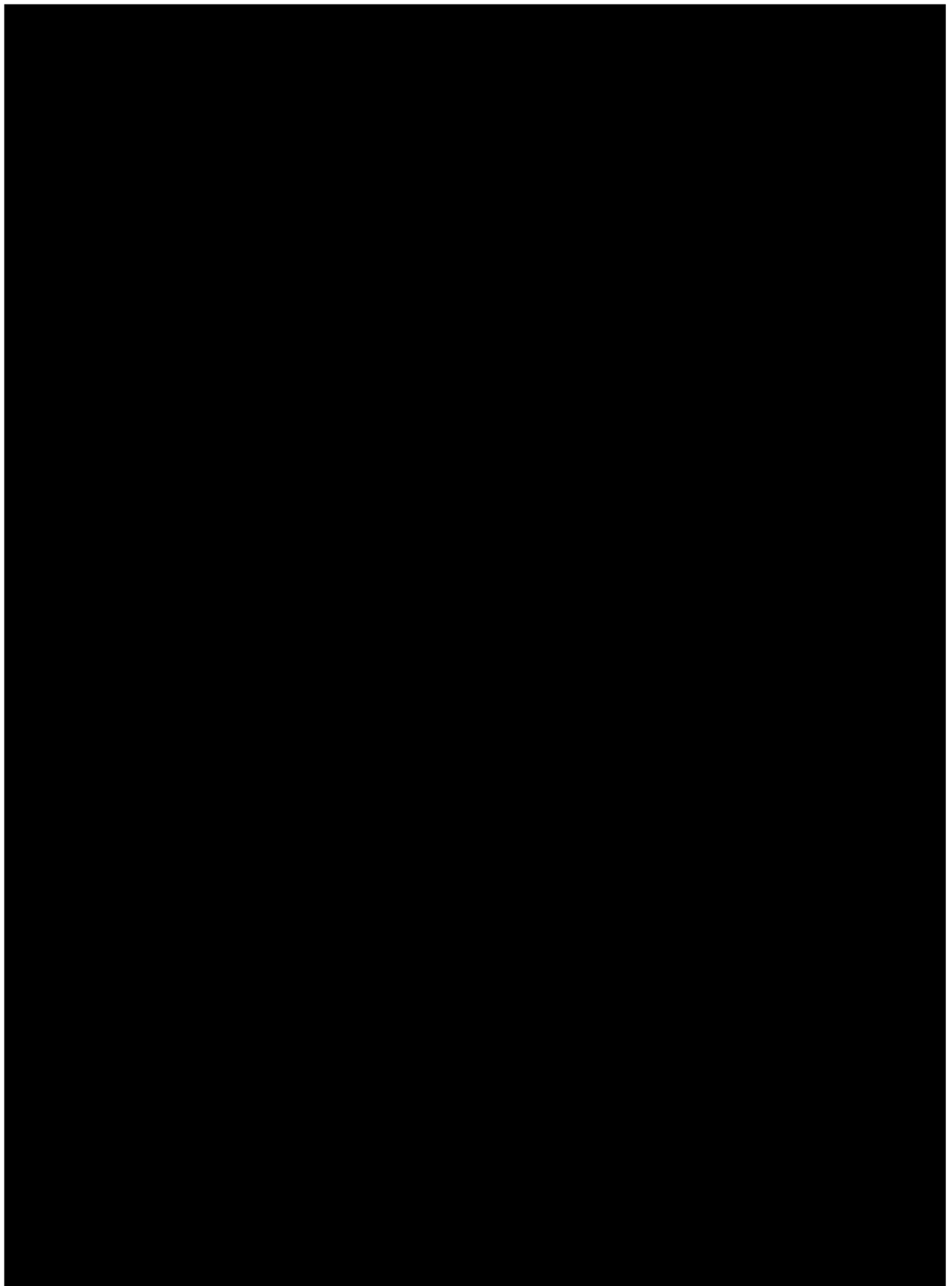


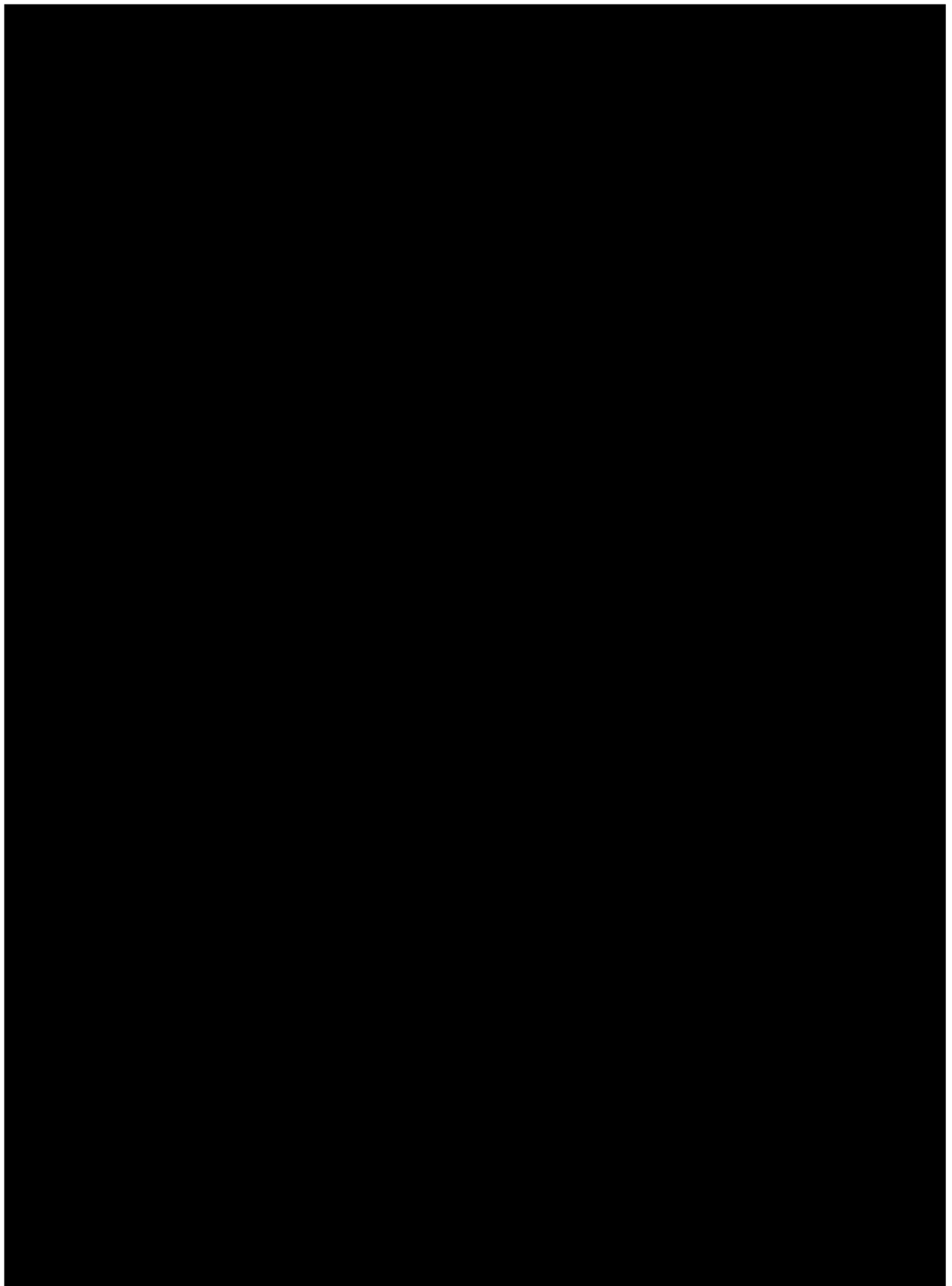


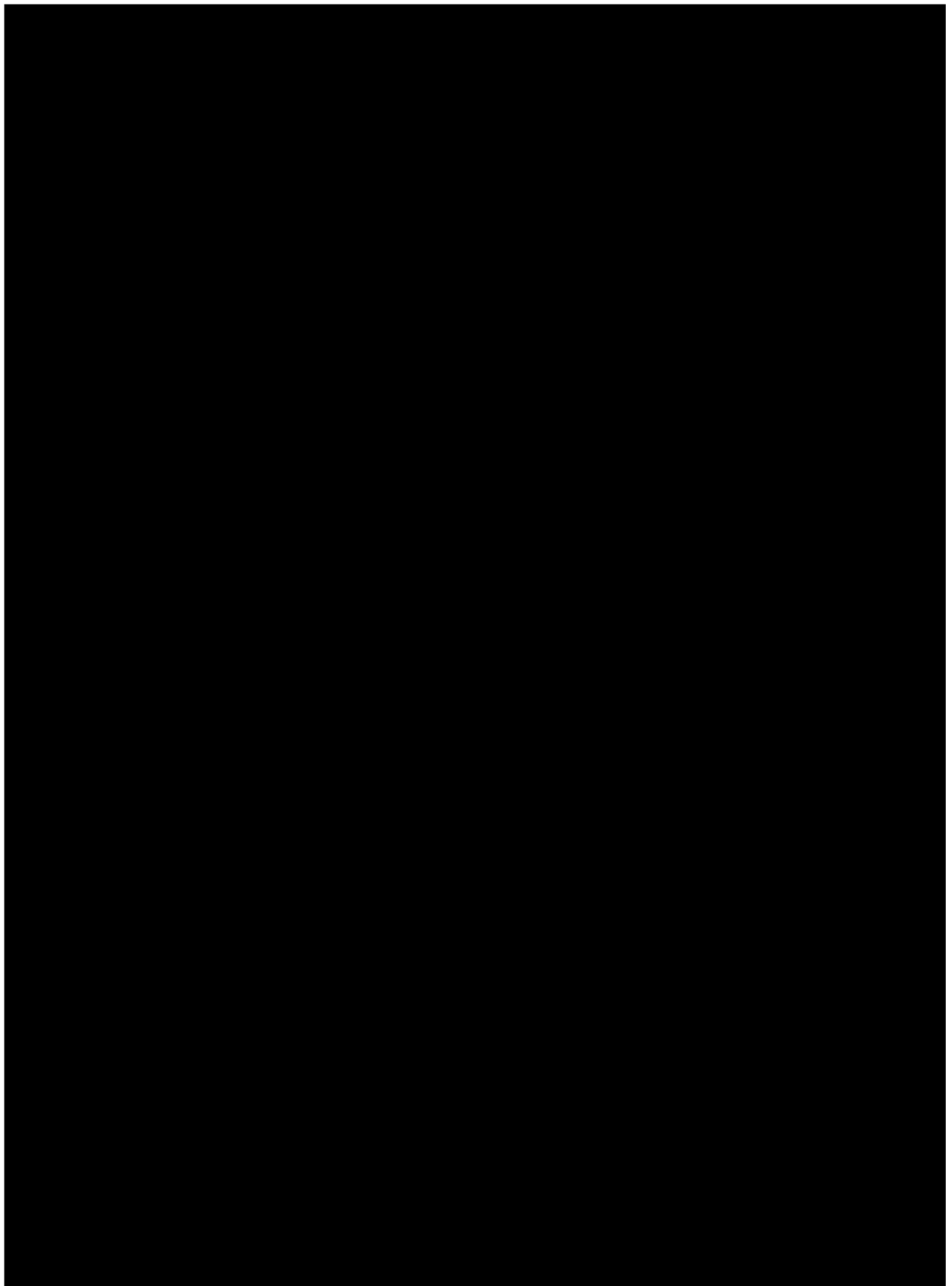




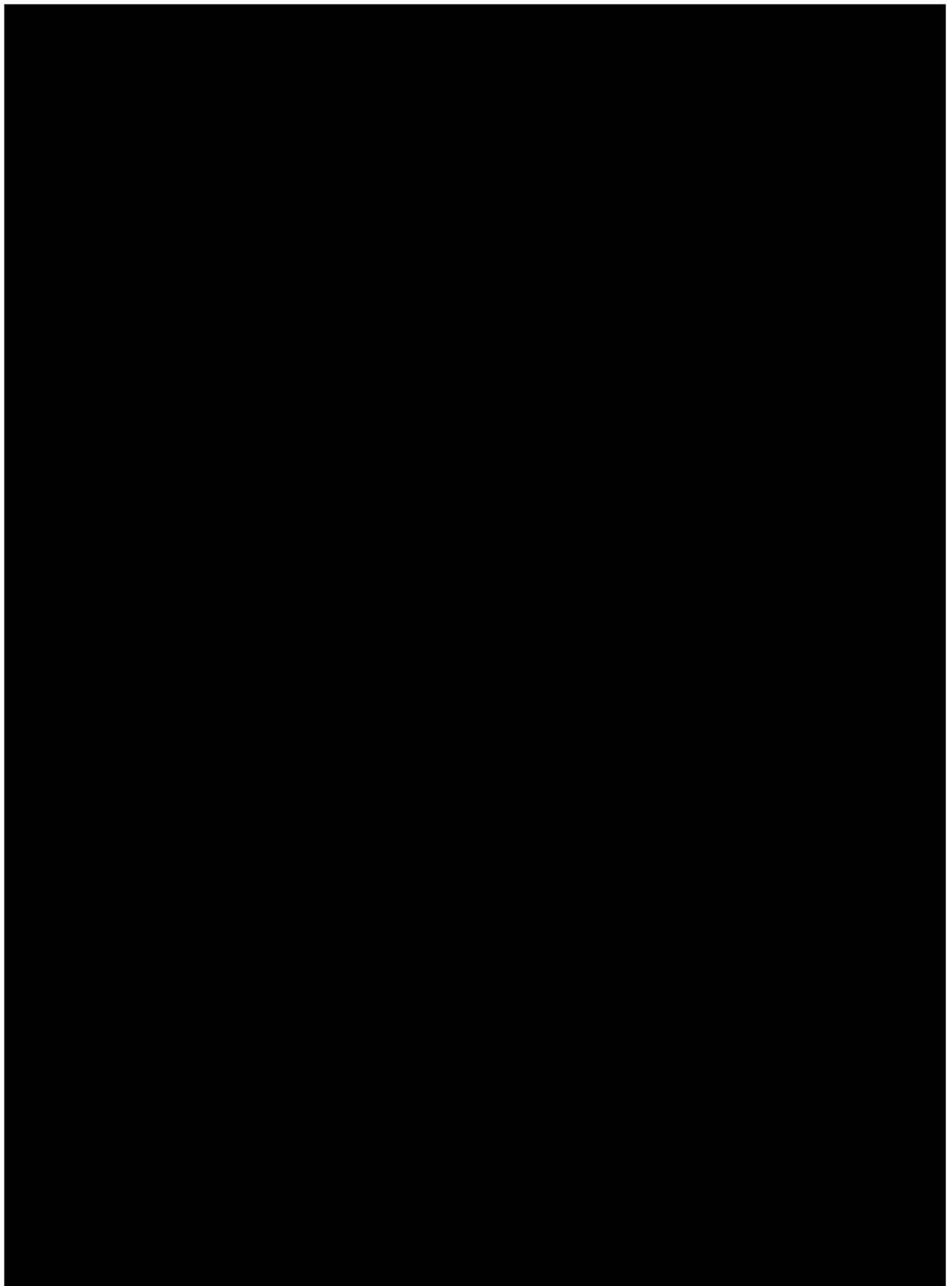


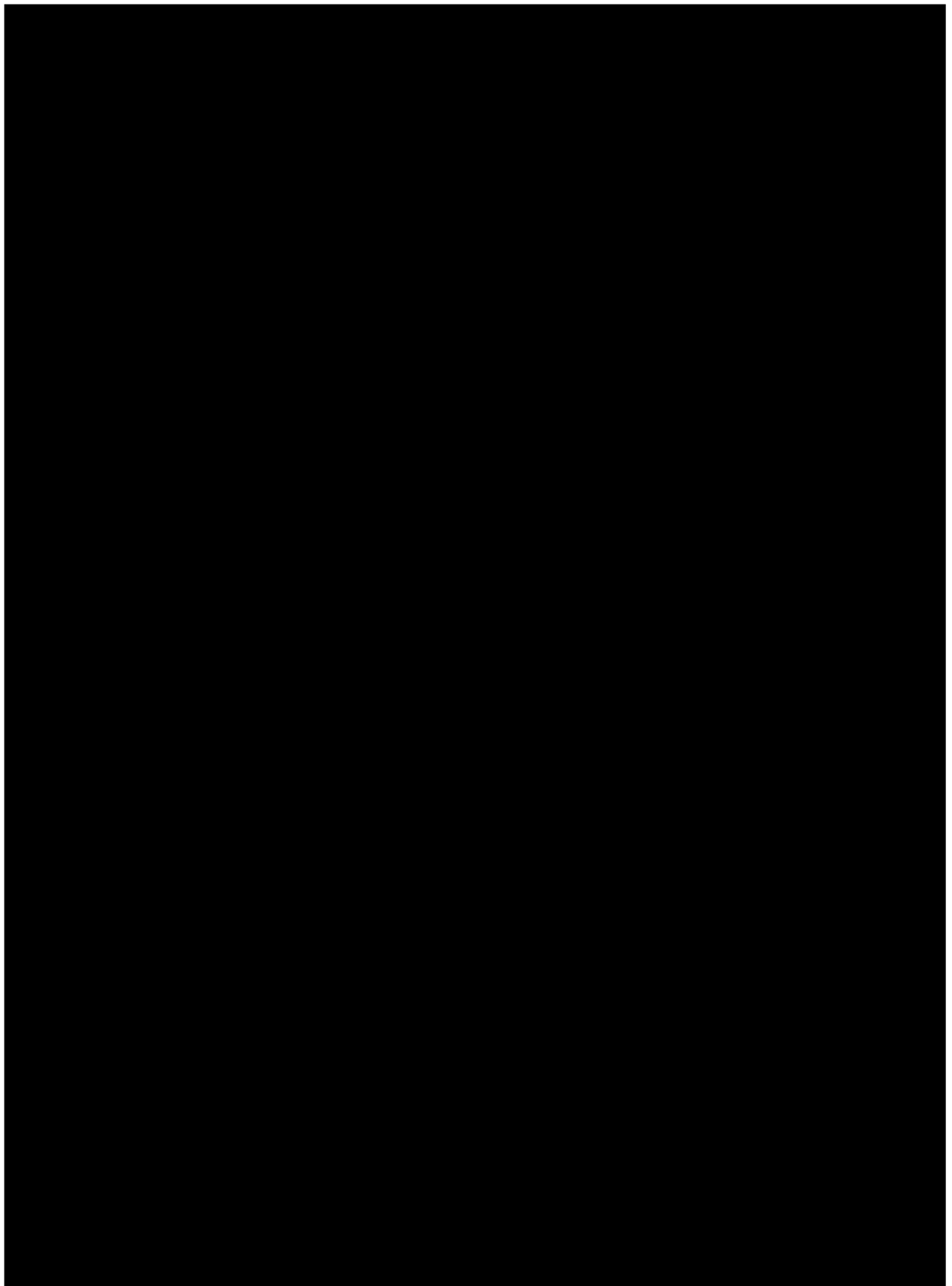


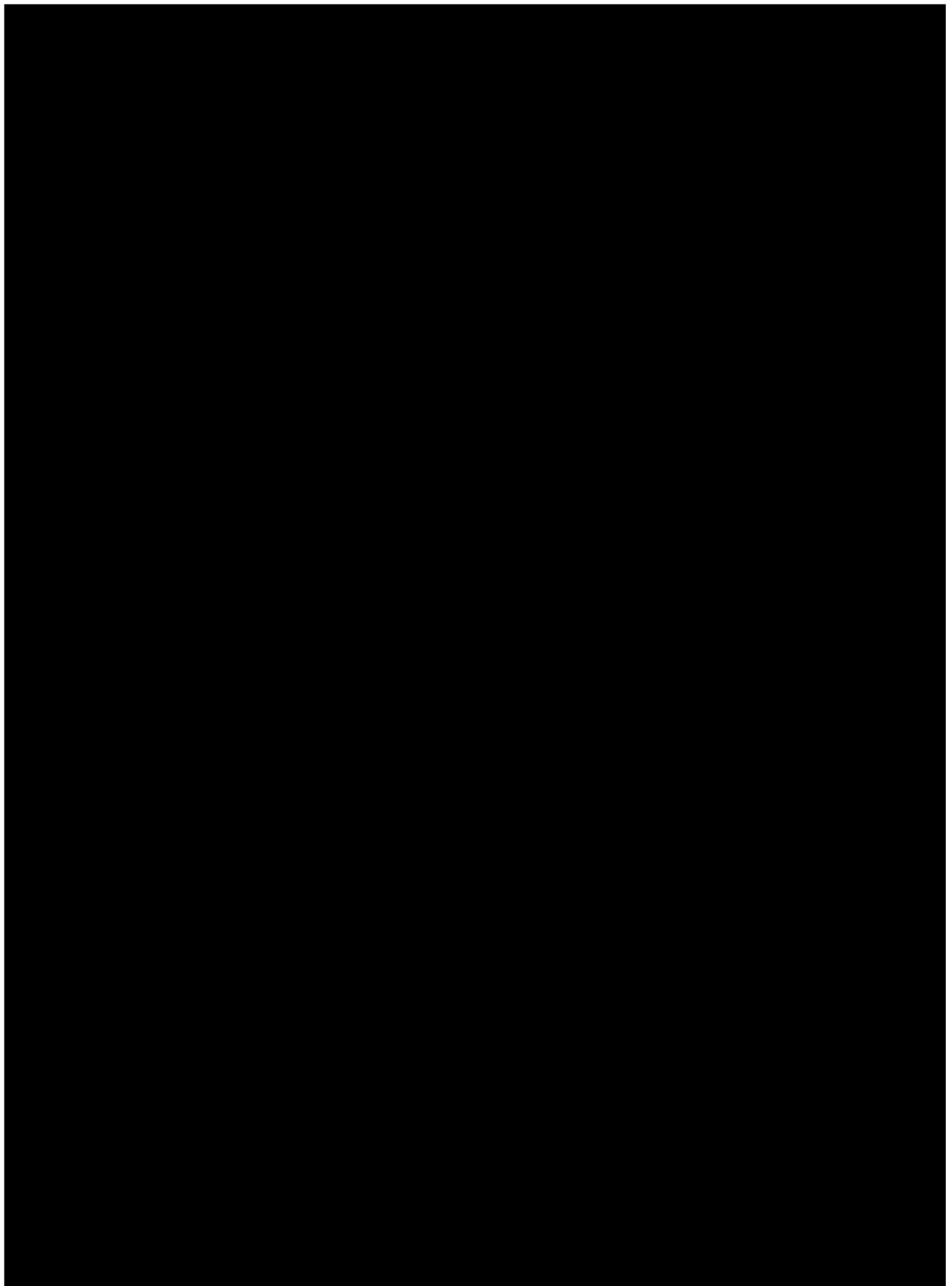


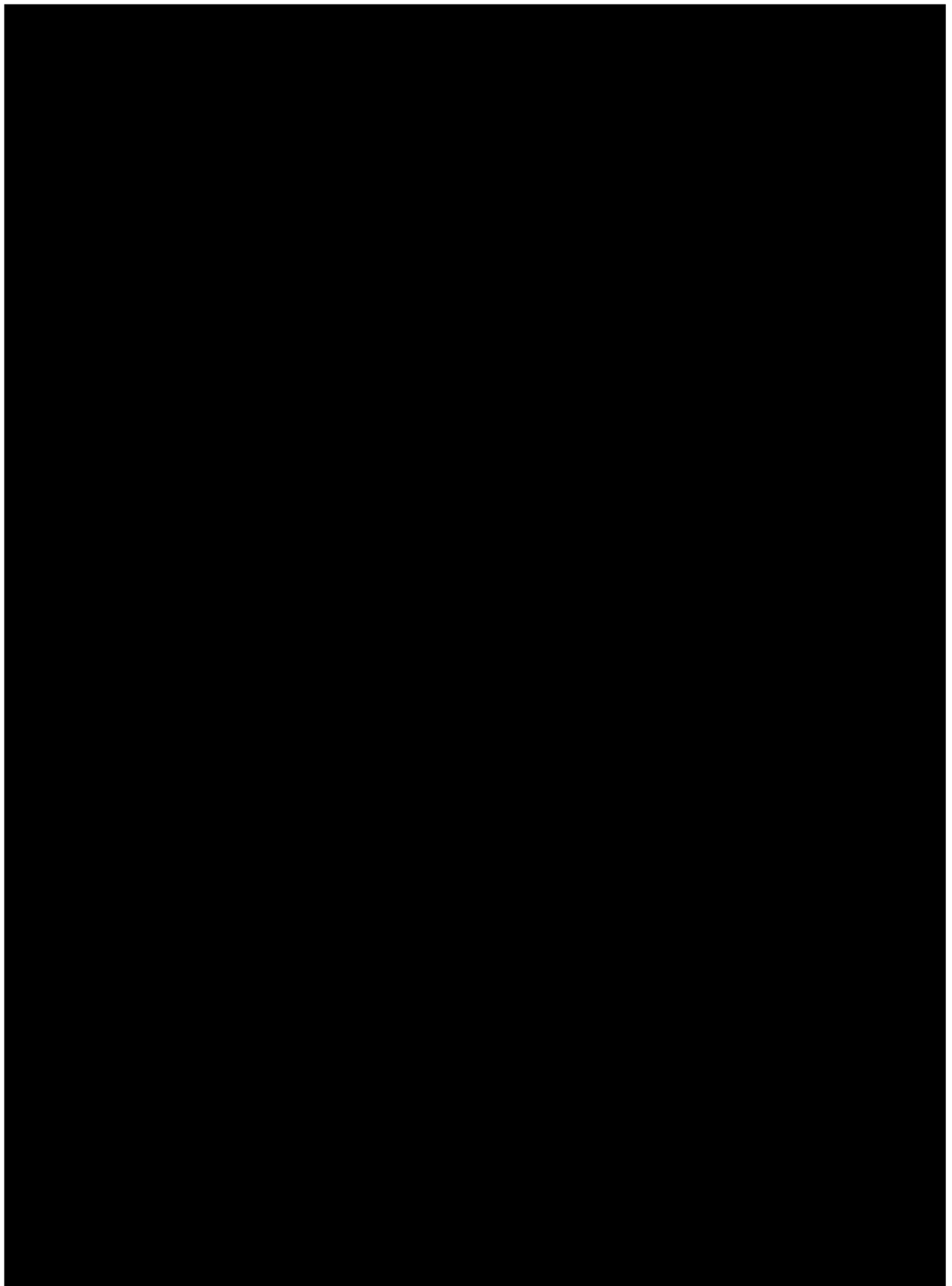


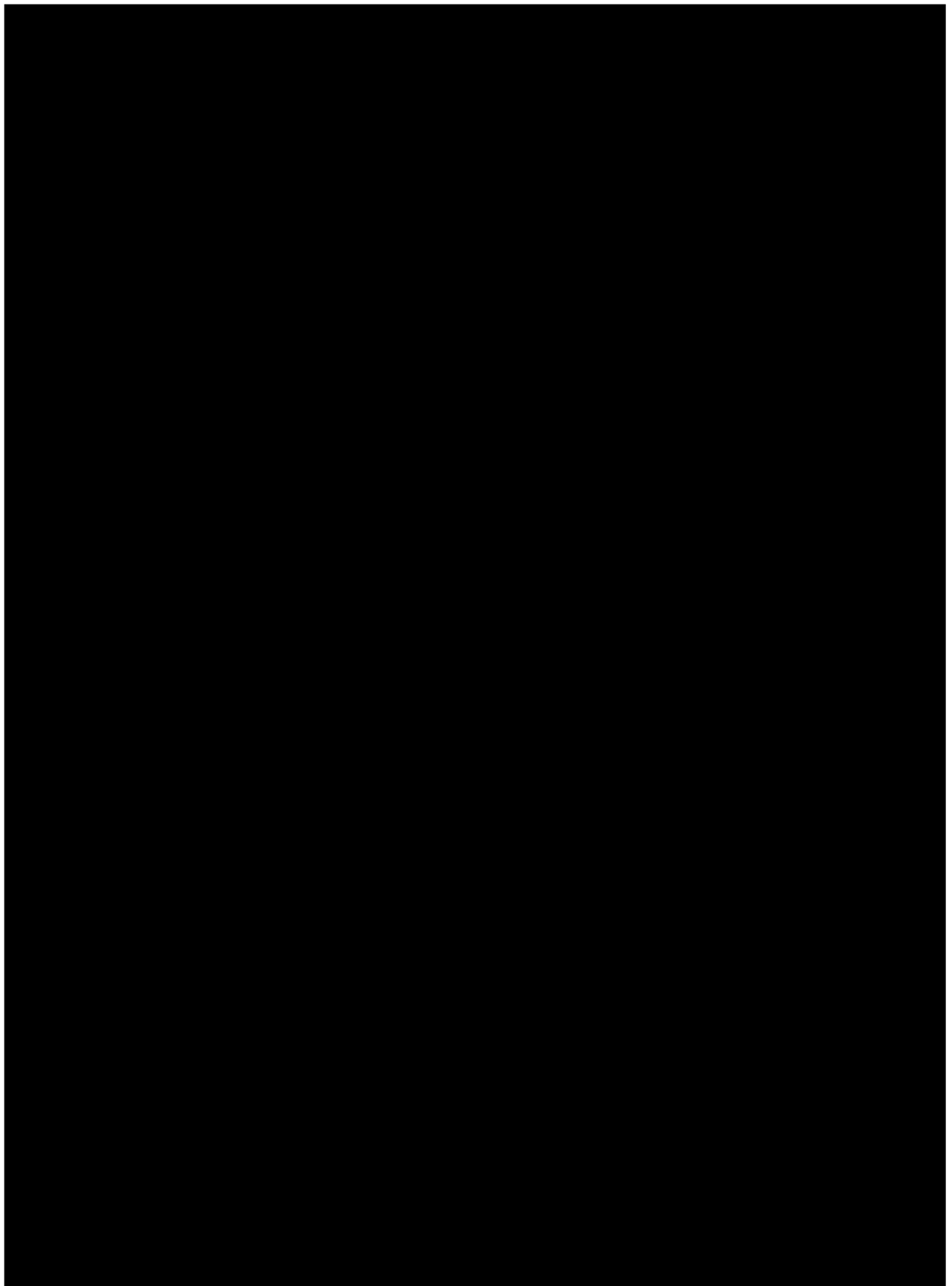


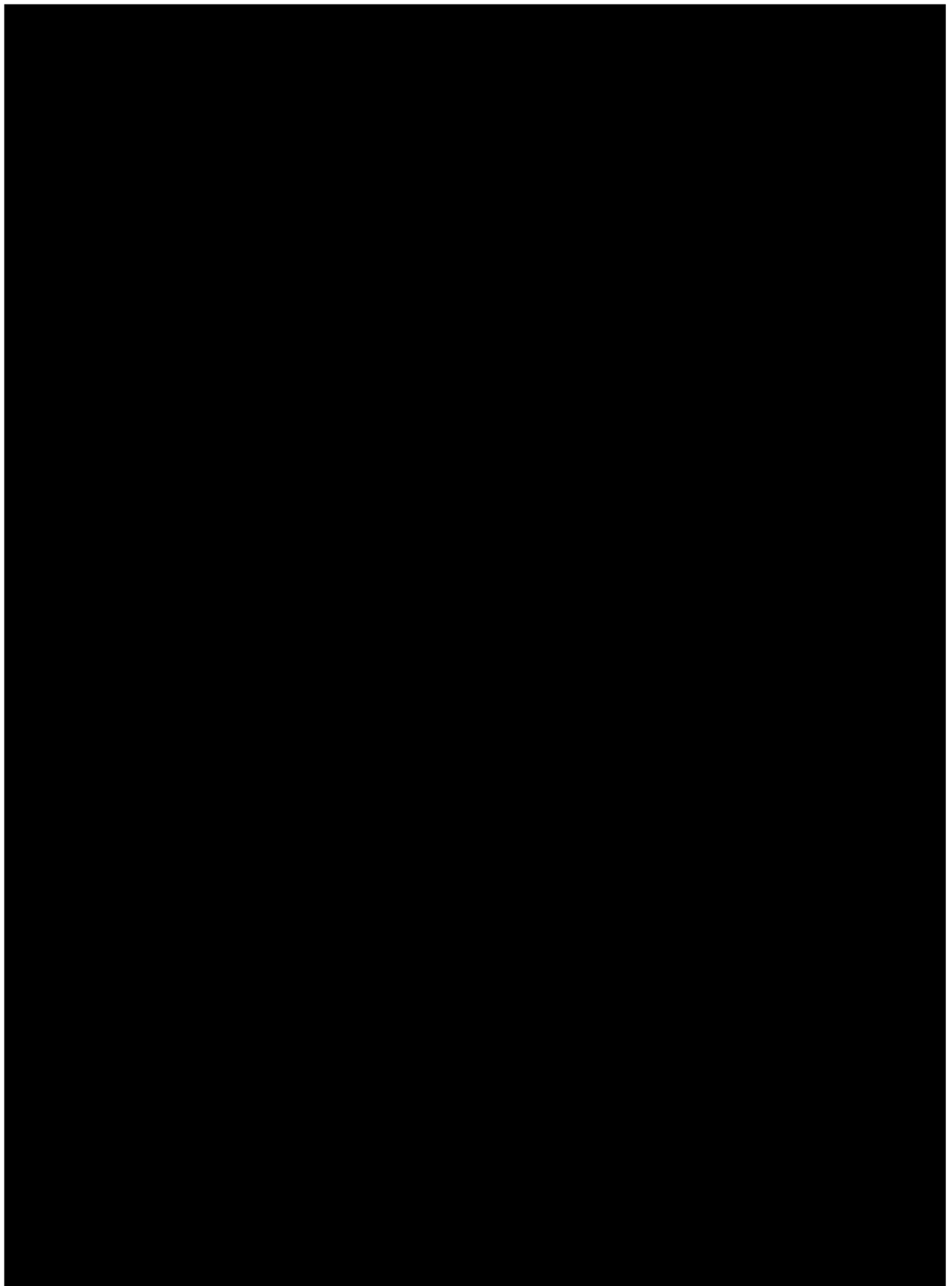


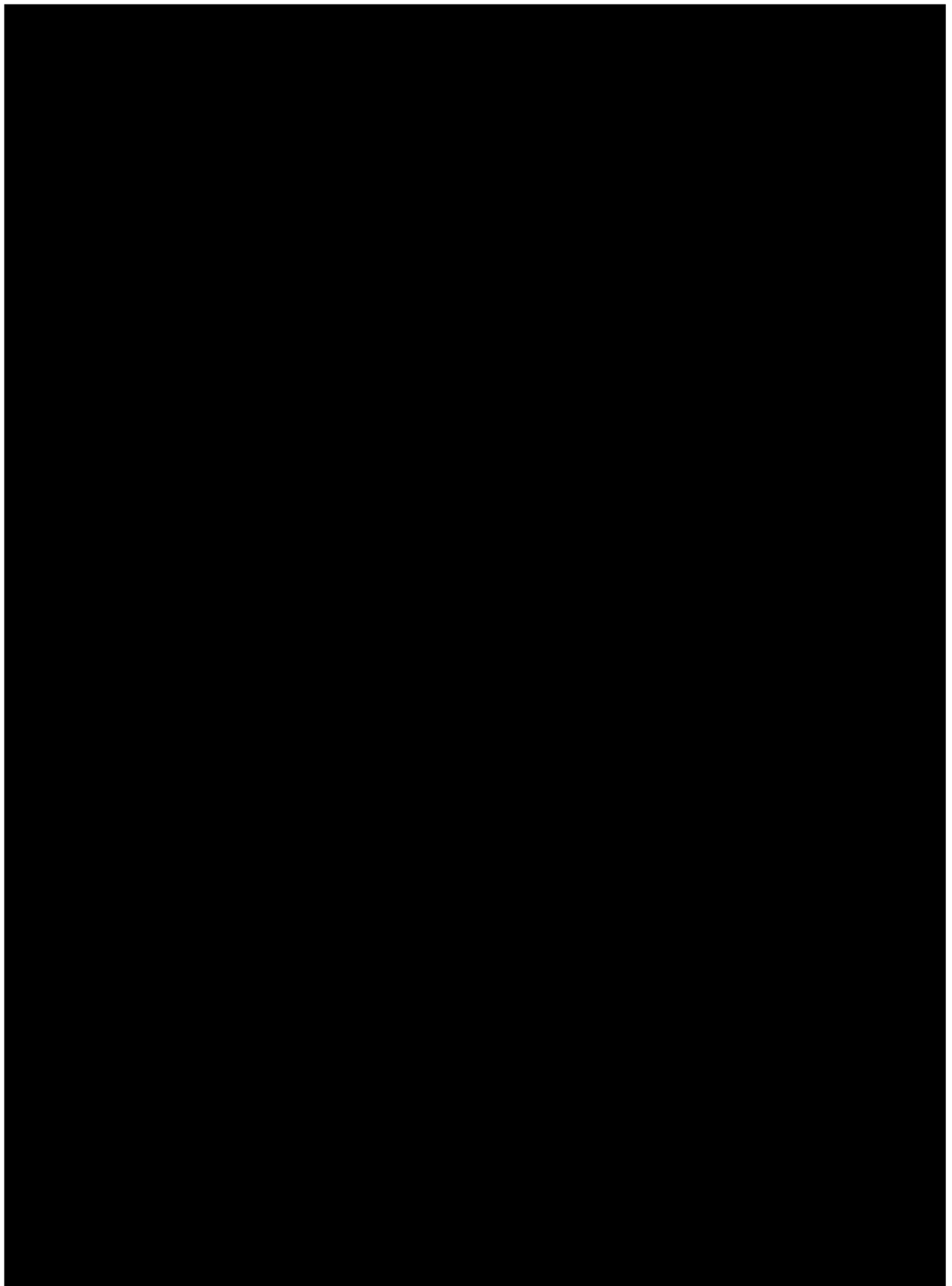


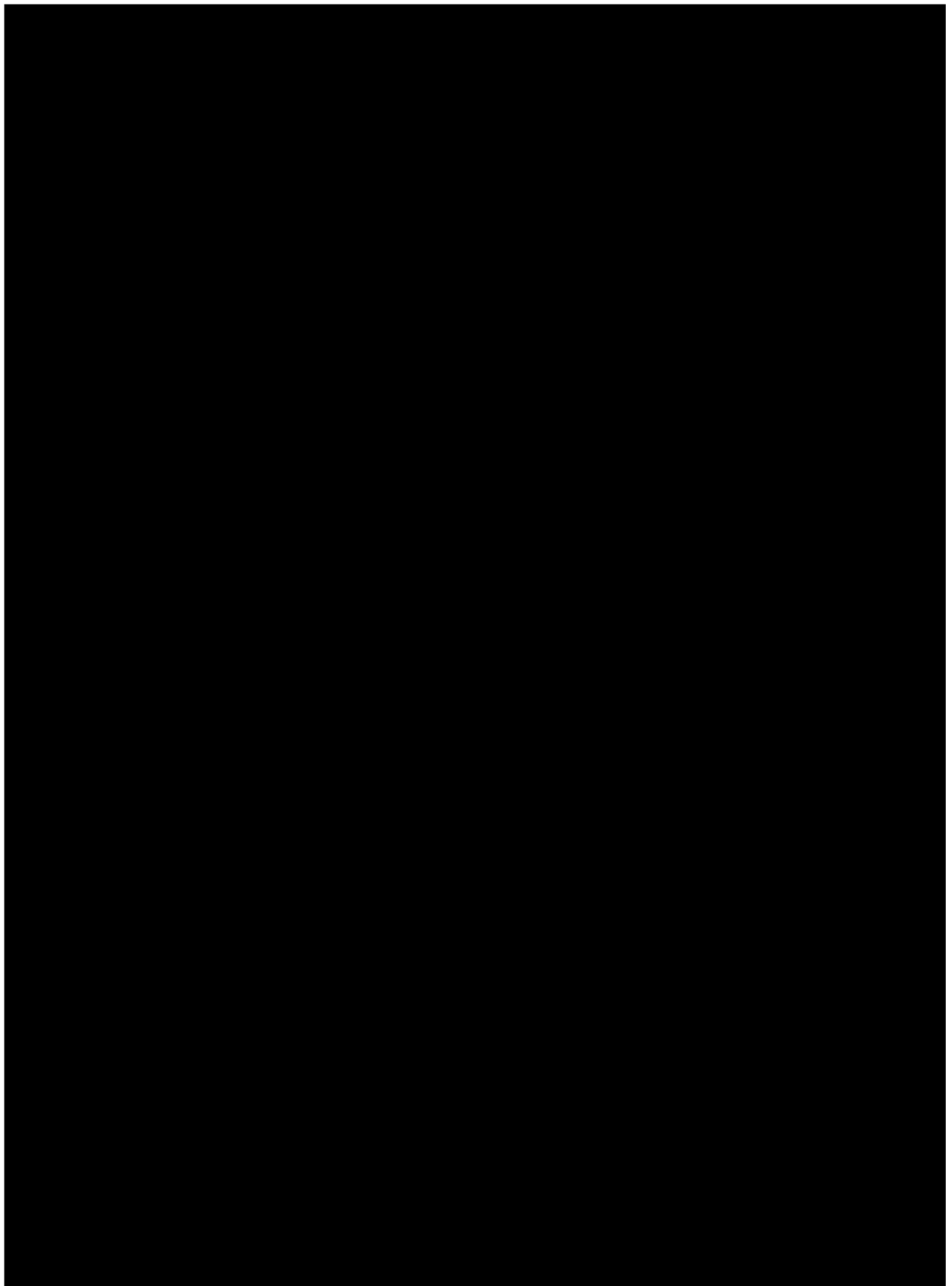




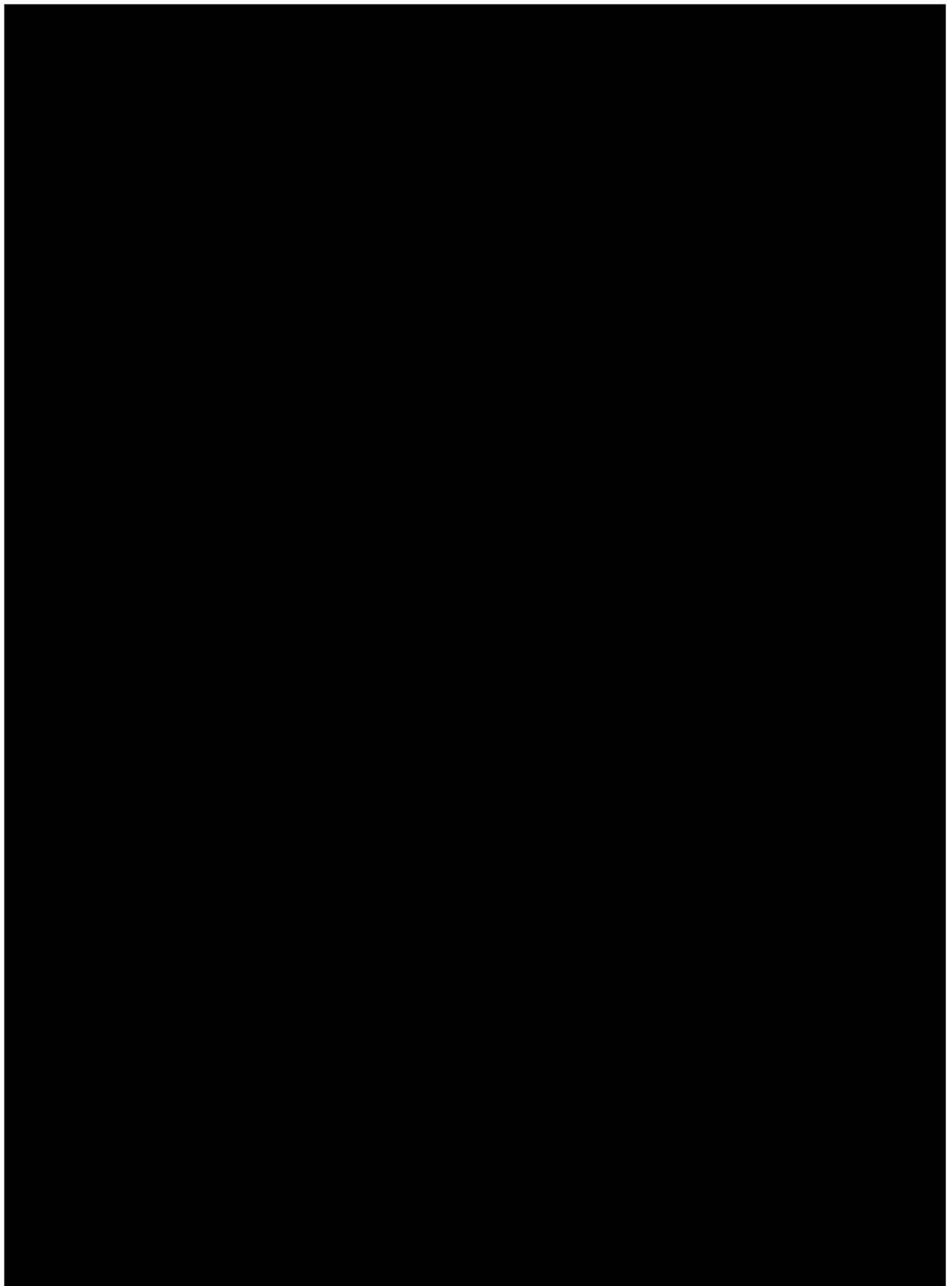


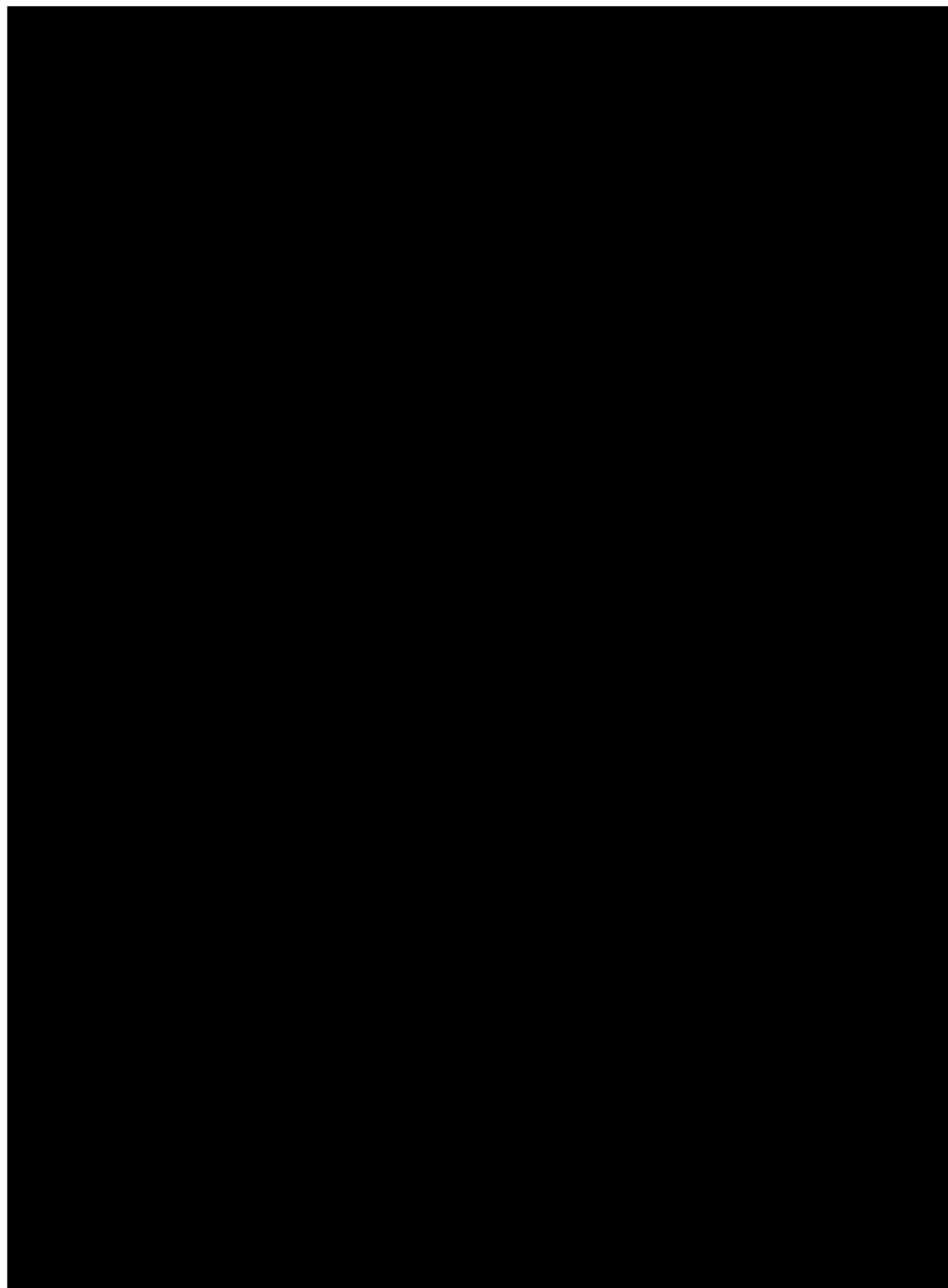


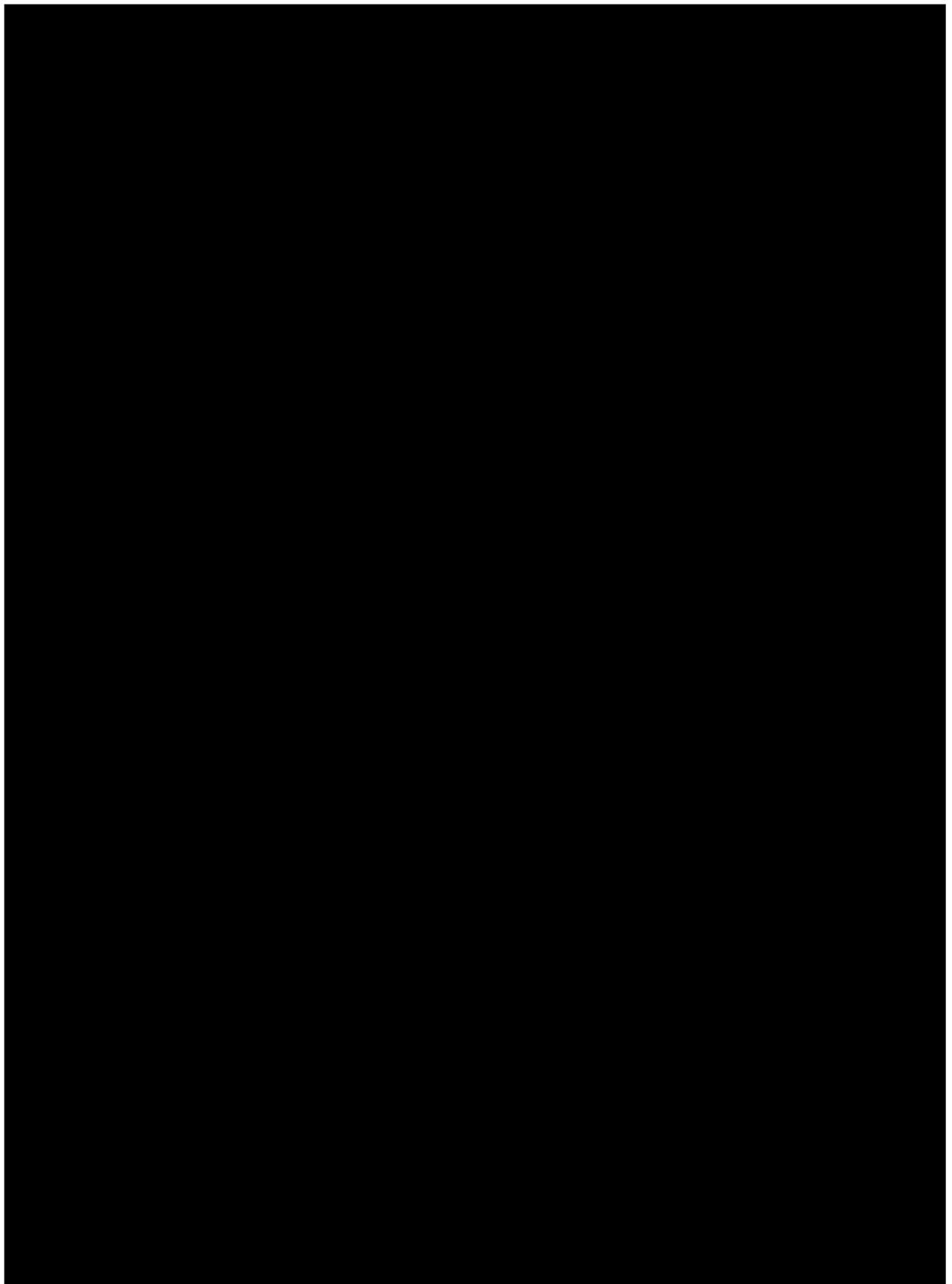


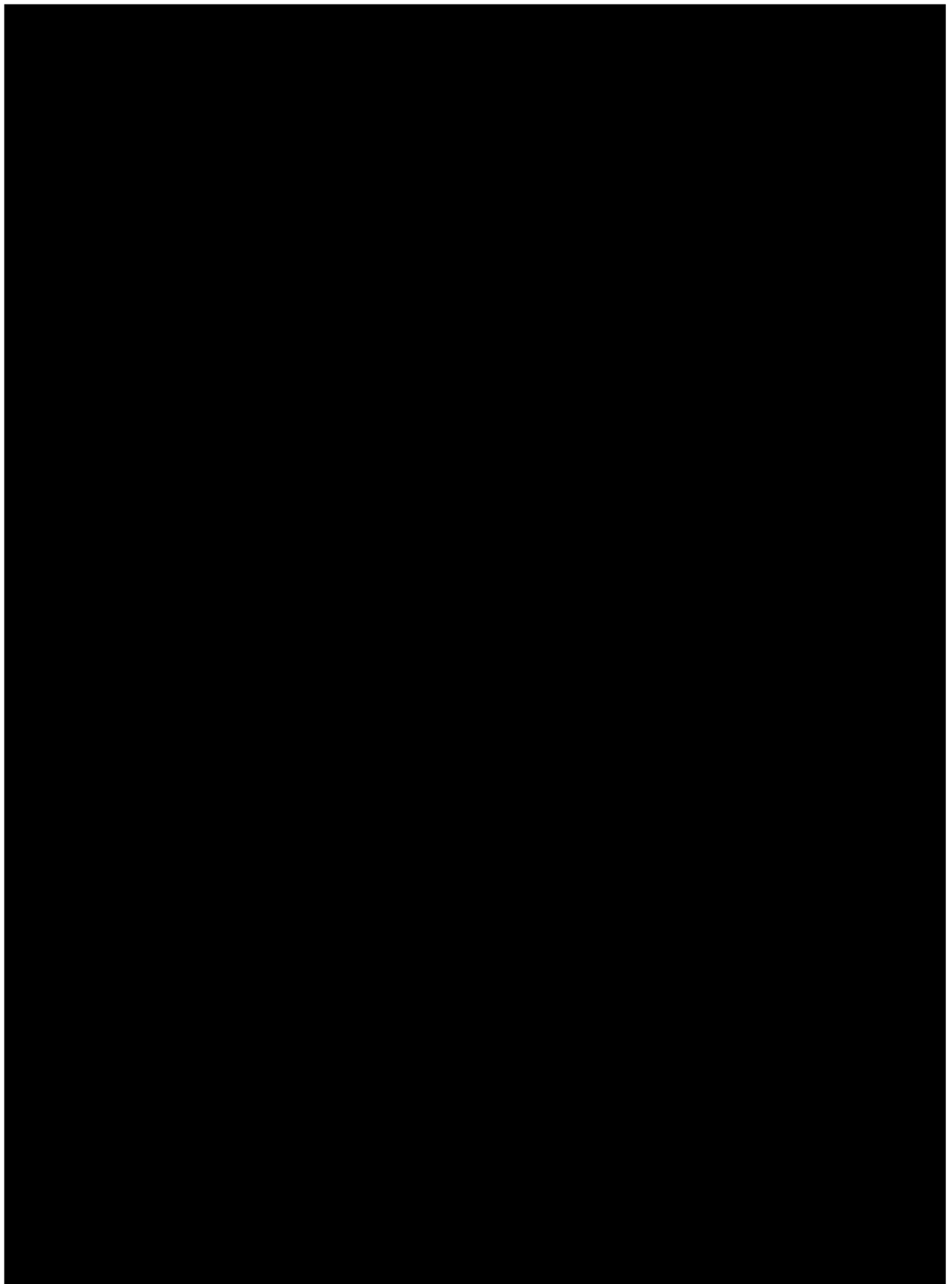


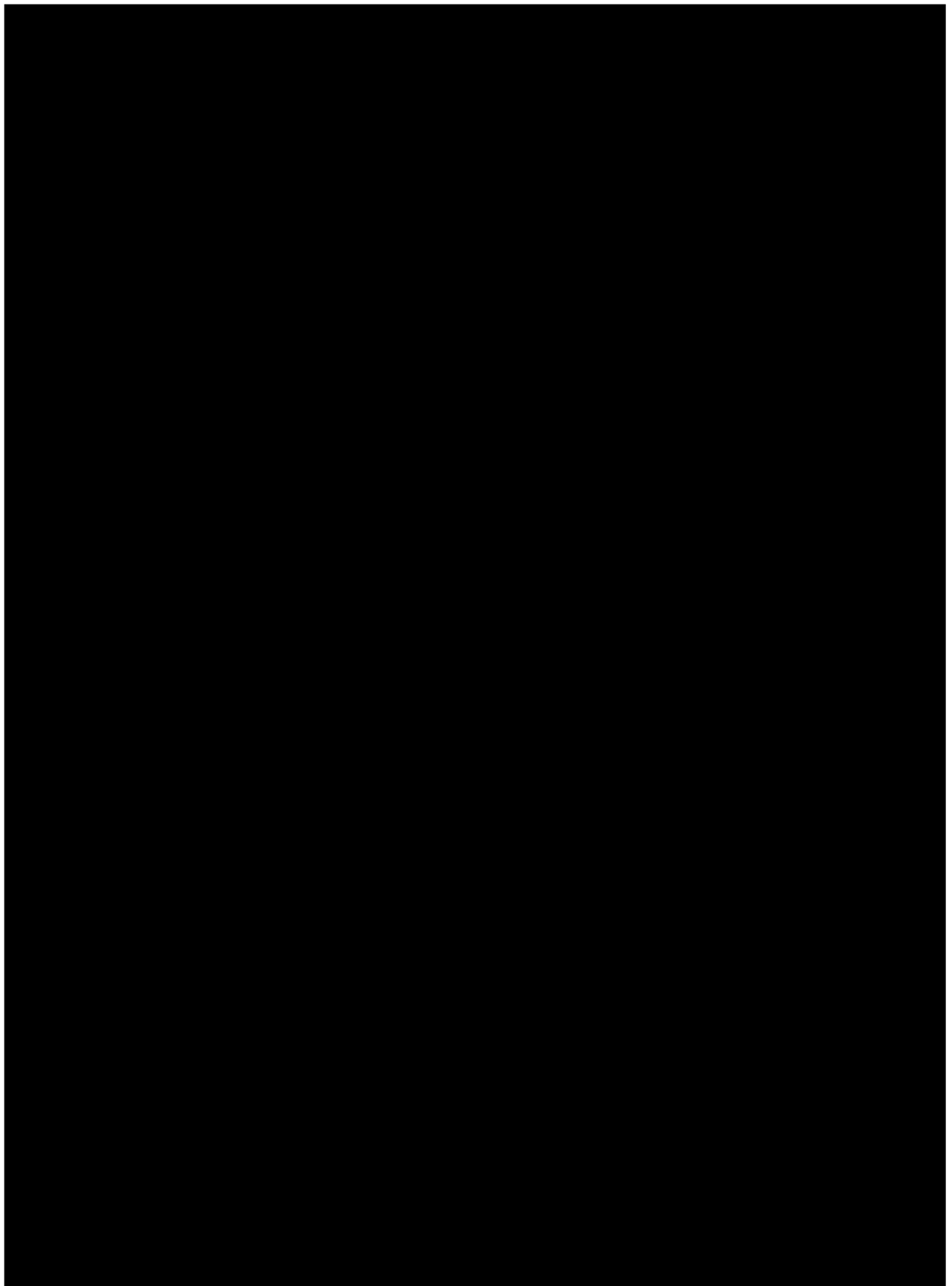


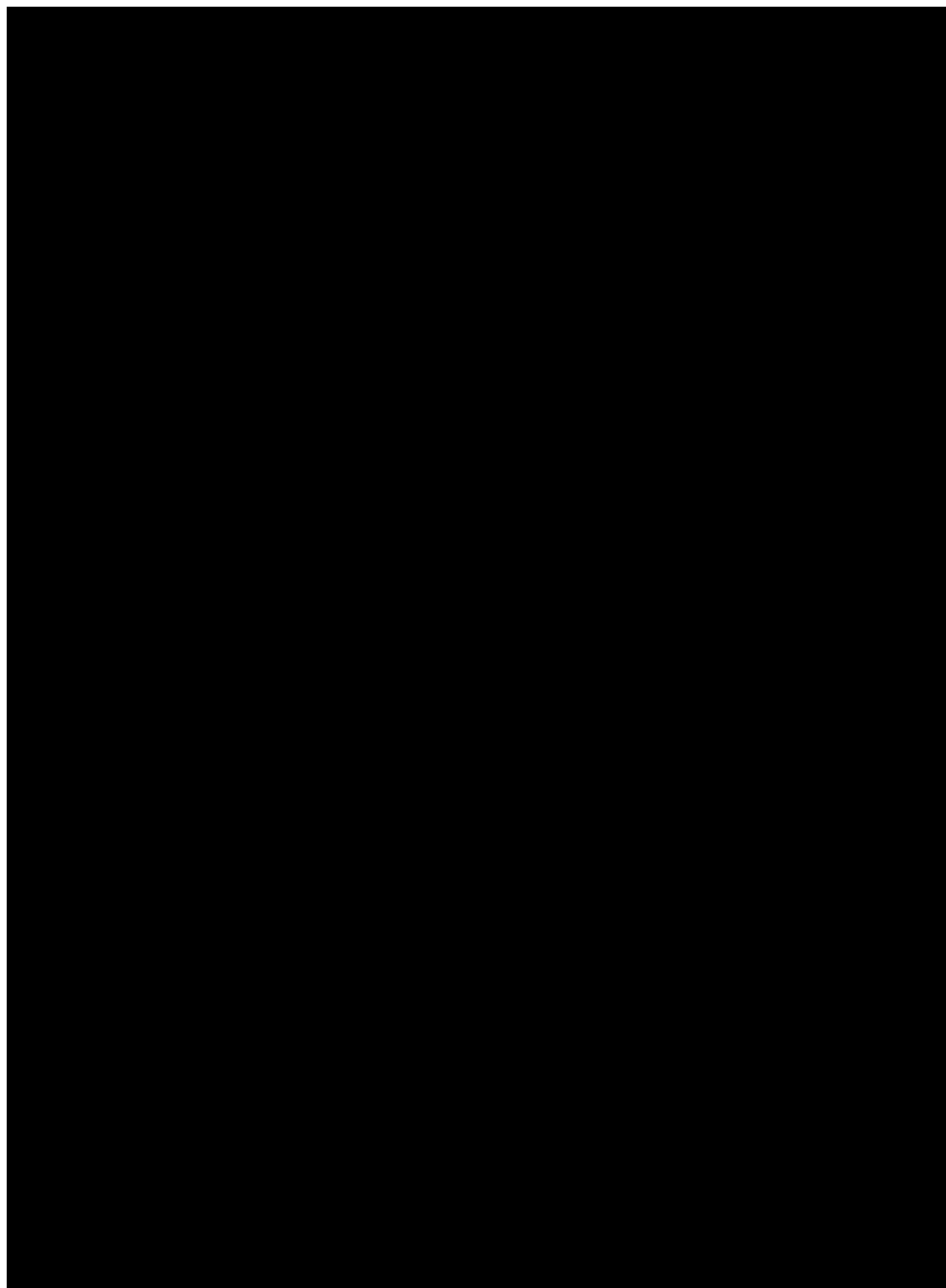












## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#),  
Tryke Companies UT, 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.  
Commercial information .

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.)

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

Please see the attached GRAMA Claim of Business Confidentiality statement

Signed: \_\_\_\_\_

On behalf of (company):

Tryke Companies UT, LLC (Lesley Scott Gordon, VP Licensing & Regulatory Affairs, Curaleaf, Inc.)

Date: \_\_\_\_\_

01/23/2026

### **GRAMA Claim of Business Confidentiality**

The following is a concise statement supporting the claim of business confidentiality related to Tryke Companies UT, LLC's ("Applicant") submission for medical cannabis Processor establishment application:

The information contained on Checklist p. 1-7, and Response p. 8-416 contain non-public individual and business information that is protected as trade secret and contains specific employee name and contact information. Applicant derives independent economic value from its business location, ownership structure, expected opening date, and operational hours to the extent that information is not readily ascertainable. Our competitors can derive economic value from its disclosure. Applicant has taken reasonable efforts to maintain the secrecy of such information.

#### **Processing Establishment Property Information**

The information contained on Response p. 8-407, 413-414, 416 contain non-public property and facility information that is protected as trade secret. Applicant derives independent economic value from its facility layout, blueprint descriptions, and description summaries for highly competitive application submissions. It has hired experts and expended considerable resources to design a state-of-the-art facility. Our competitors can derive economic value from its disclosure and competitive advantages from the disclosure of such information that is not publicly available. Applicant has taken reasonable efforts to maintain the secrecy of such information. In addition, keeping Applicant's facility diagrams confidential is vital for ensuring a secure facility. Disclosure could compromise the safety of the facility, its contents, and the employees working within the facility.

#### **Operating Plan**

The information contained on Response pages 8-407, 413-414, 416 strike at the heart of trade secret information and describe our facility's operating plan. Applicant derives independent economic value from its product types, product type descriptions, extraction methods and processes, equipment used, applicable security procedures and protocols, storage plans, recall practices, destruction methods, transportation strategies, and the formulas patterns, compilations, programs, devices, methods, techniques, and processes associated with the operating plan. Its description and summaries are kept confidential and are only available to internal personnel that need to know the information. Any such disclosure may be used in a highly competitive application submissions by competitors not only in Utah but other jurisdictions as well. Applicant has hired experts and expended considerable resources to develop its operating plan. Applicant has taken reasonable efforts to maintain the secrecy of such information. In addition, keeping Applicant's security information confidential is vital for ensuring a secure facility. Disclosure could compromise the safety of the facility, its contents, and the employees working within the facility.

#### **Appendixes** Response P. 1-7, 408-412, 415

Applicant's Ownership structure, performance bond, manufactured food status, business license, and municipal permit constitute trade secret information. The descriptions constitute methods and



techniques related to the application procedures that our competitors could use upon disclosure to submit similarly situated applications without expending the time and resources necessary to create the same content. Applicant derives economic value from such documents and has taken reasonably necessary efforts to maintain its secrecy. Further, the ownership issue contains personal information not readily available to the public.

GRAMA Claim of Business Confidentiality

This concise statement constitutes a trade secret. As with other portions of the application descriptions, Applicant derives economic benefit from these statements. If disclosed, competitors could bypass the time and training expended and expertise necessary to detail trade secret and confidential information by copying such descriptions. Applicant has limited access to such descriptions and has not made them readily available to the public.



**PRODUCTION FACILITY APPLICATION**  
**UTAH DEPARTMENT OF AGRICULTURE AND FOOD**

---

**Application Type**

Tier 1 Processor Renewal

**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:

Information provided must be clear and concise; do not repeat information

Ensure each section speaks to the requested information and appear in the same order as application

**Application Date**

01/09/2026

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]







































































































































































































































































































































































































































































































































































































































































































































































































































































































































































## GRAMA Claim of Business Confidentiality

Pursuant to Utah Code Section [63G-2-305](#)(1) and (2), and in accordance with Section [63G-2-309](#),  
Zion Alchemy, 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

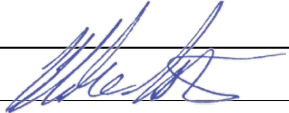
This claim is asserted because this information requires protection as it includes:

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

Zion Alchemy, LLC has developed novel and sensitive intellectual property and competitive business strategies that has enabled the company to excel in the marketplace. The company also relies heavily on its experienced key personnel to conduct market research, and production methodologies that are critical to the company's success. Disclosure of such trade secrets and commercial information would create unfair competition against the company that would result in devastating loss and damages to the company.

Signed: 

On behalf of (company): Zion Alchemy, LLC

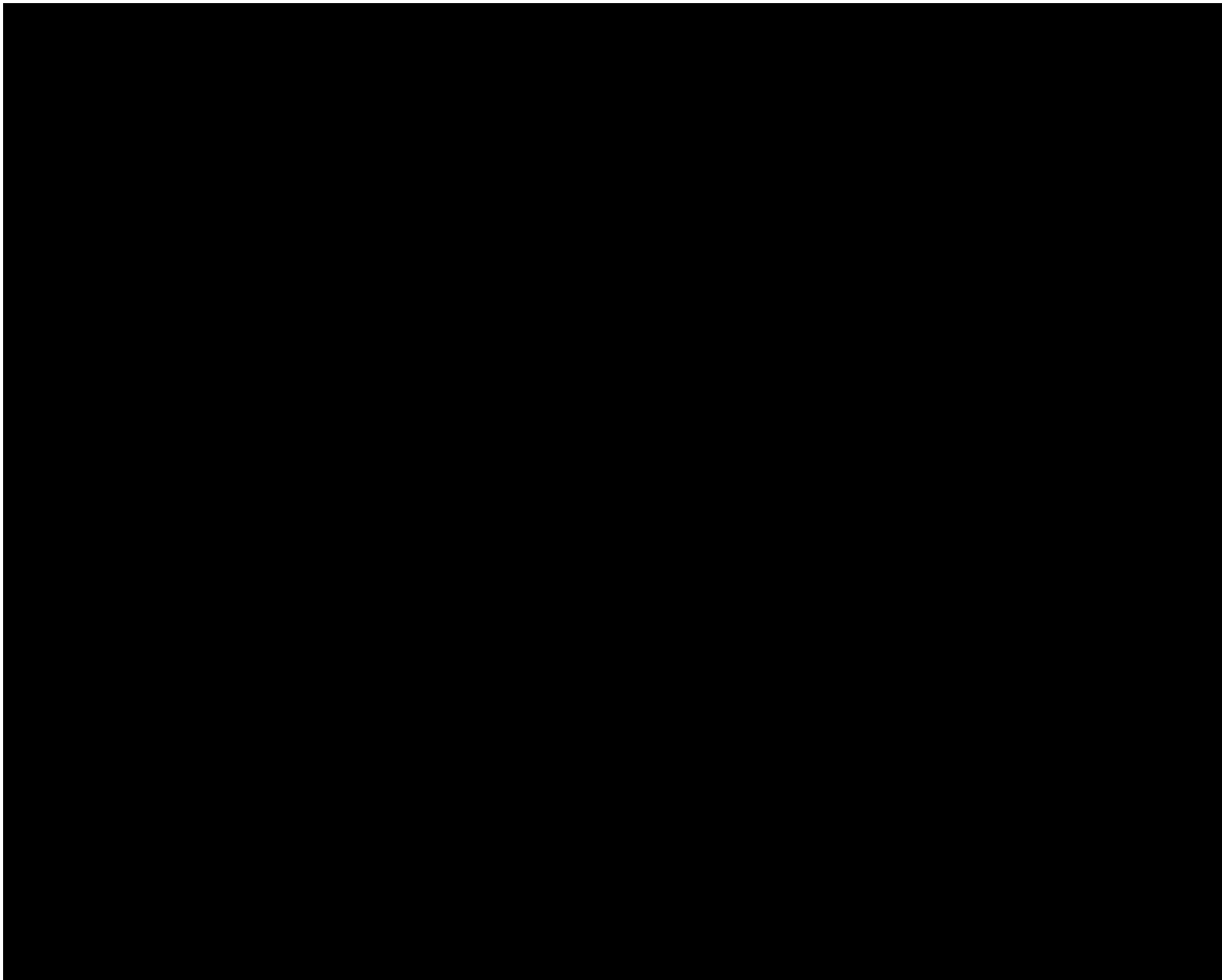
Date: 02FEB2026

Processing Establishment Property Information:

*All information in this section must follow specific requirements as outlined in Utah Administrative Rule: Cannabis Cultivation (R66-1), Cannabis Processing (R66-2), Quality Assurance Testing on Cannabis (R66-3), and/or Independent Cannabis Testing Laboratory (R66-4) as applicable to the license type you are seeking.*

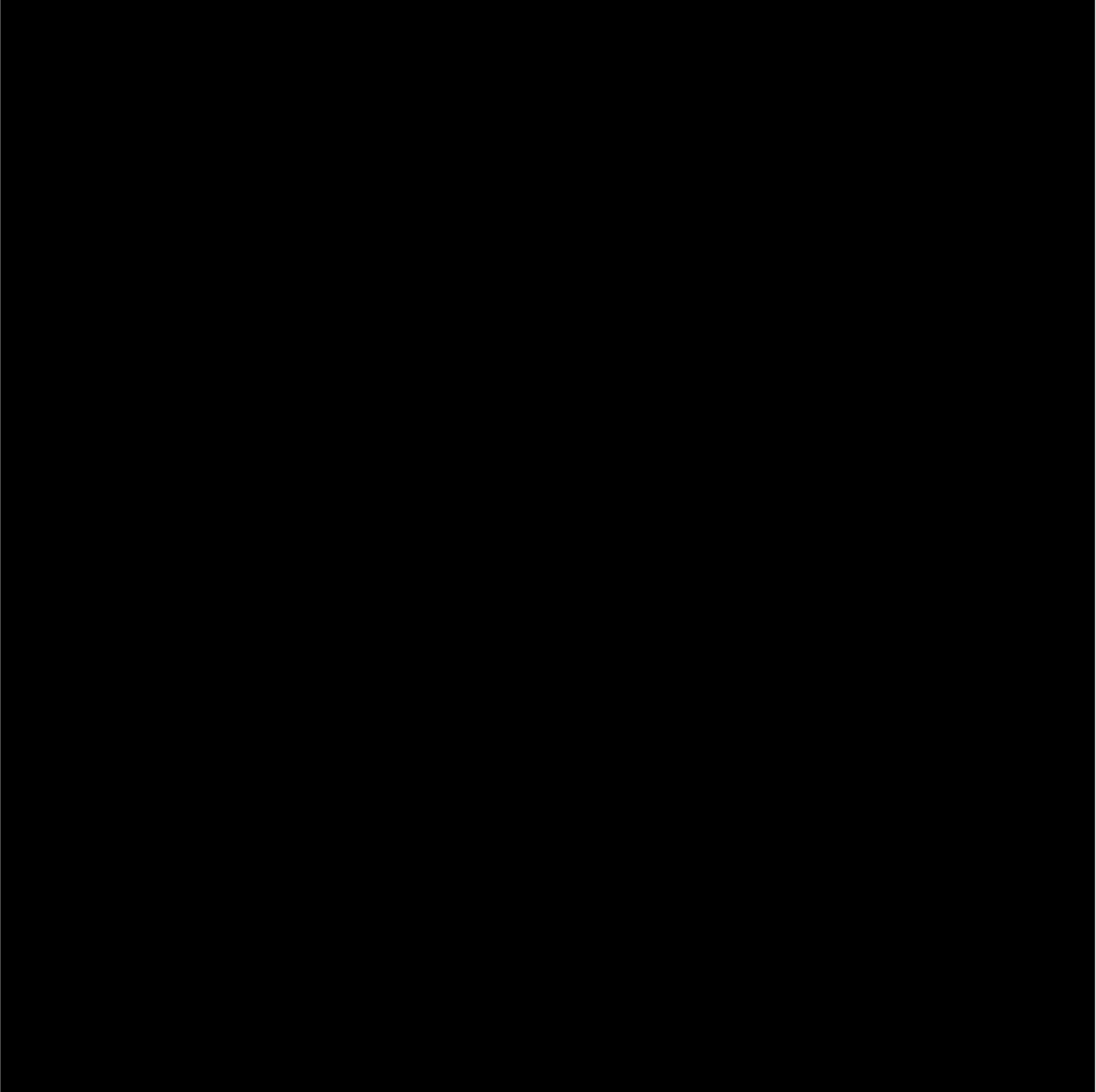
Please upload the establishment's current facility blueprint with:

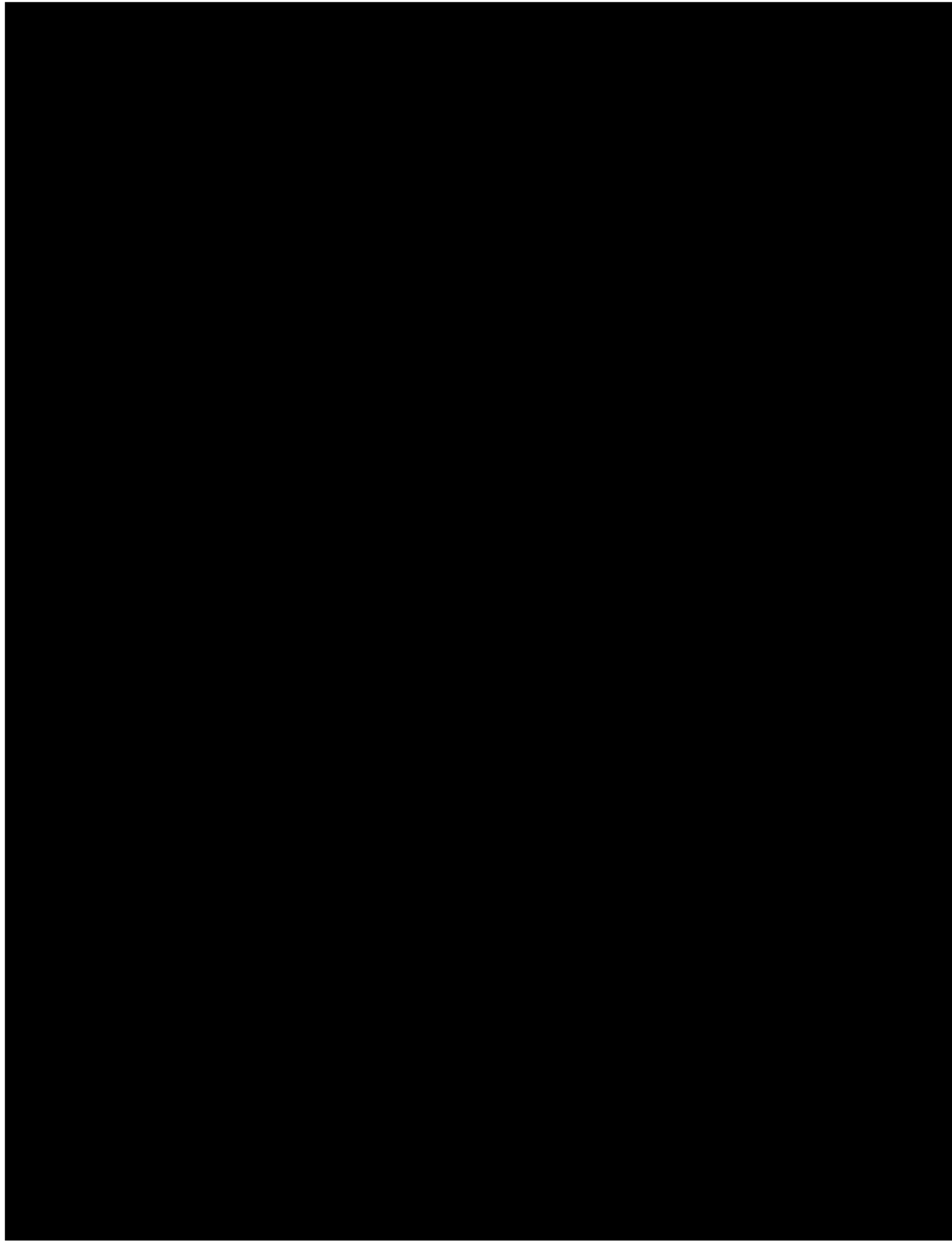
[REDACTED]



#### Security Plan

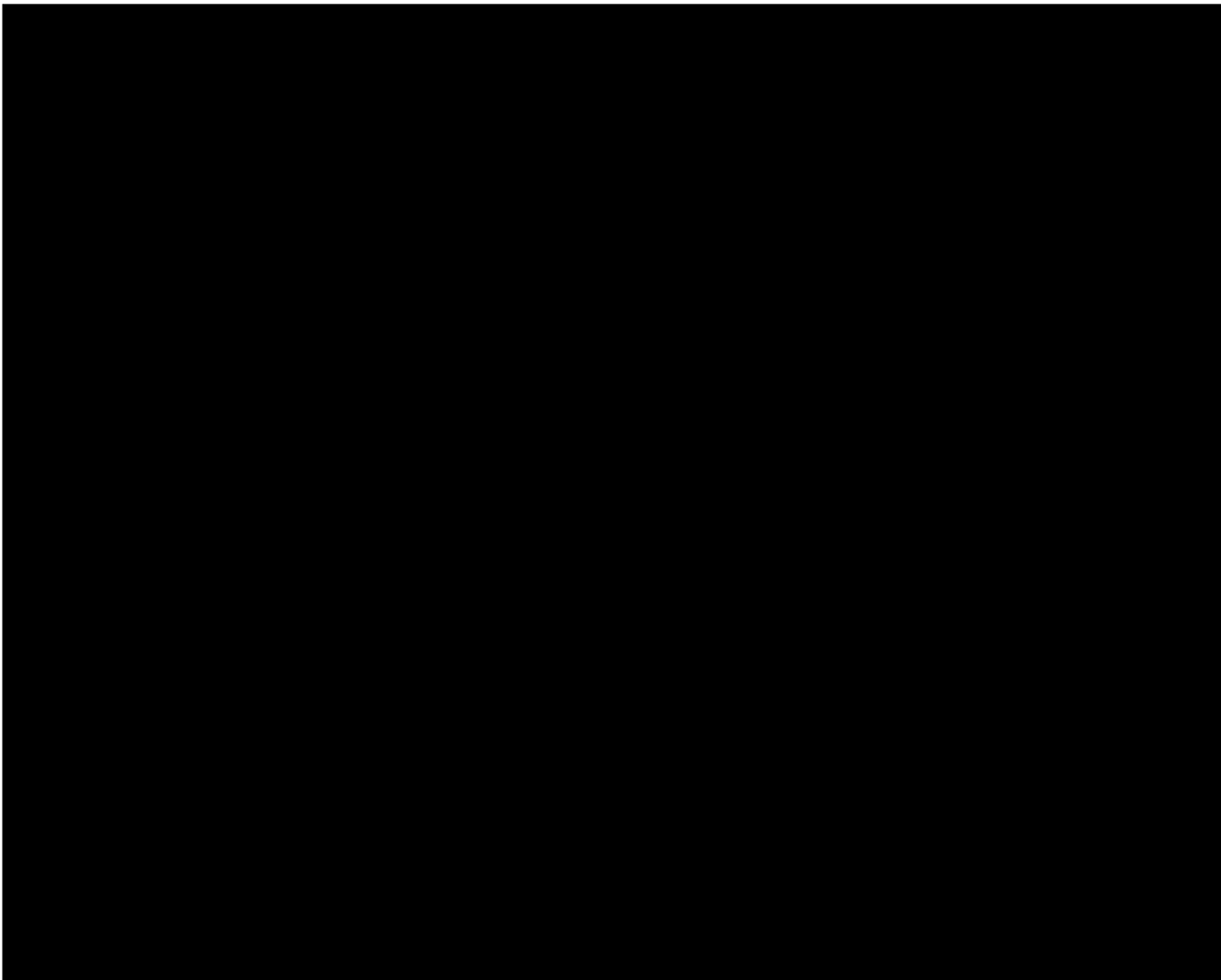
Submit the cannabis processing facility's most up-to-date security plan. Security plans shall include:

- 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
  - f) Visitor policy
- 



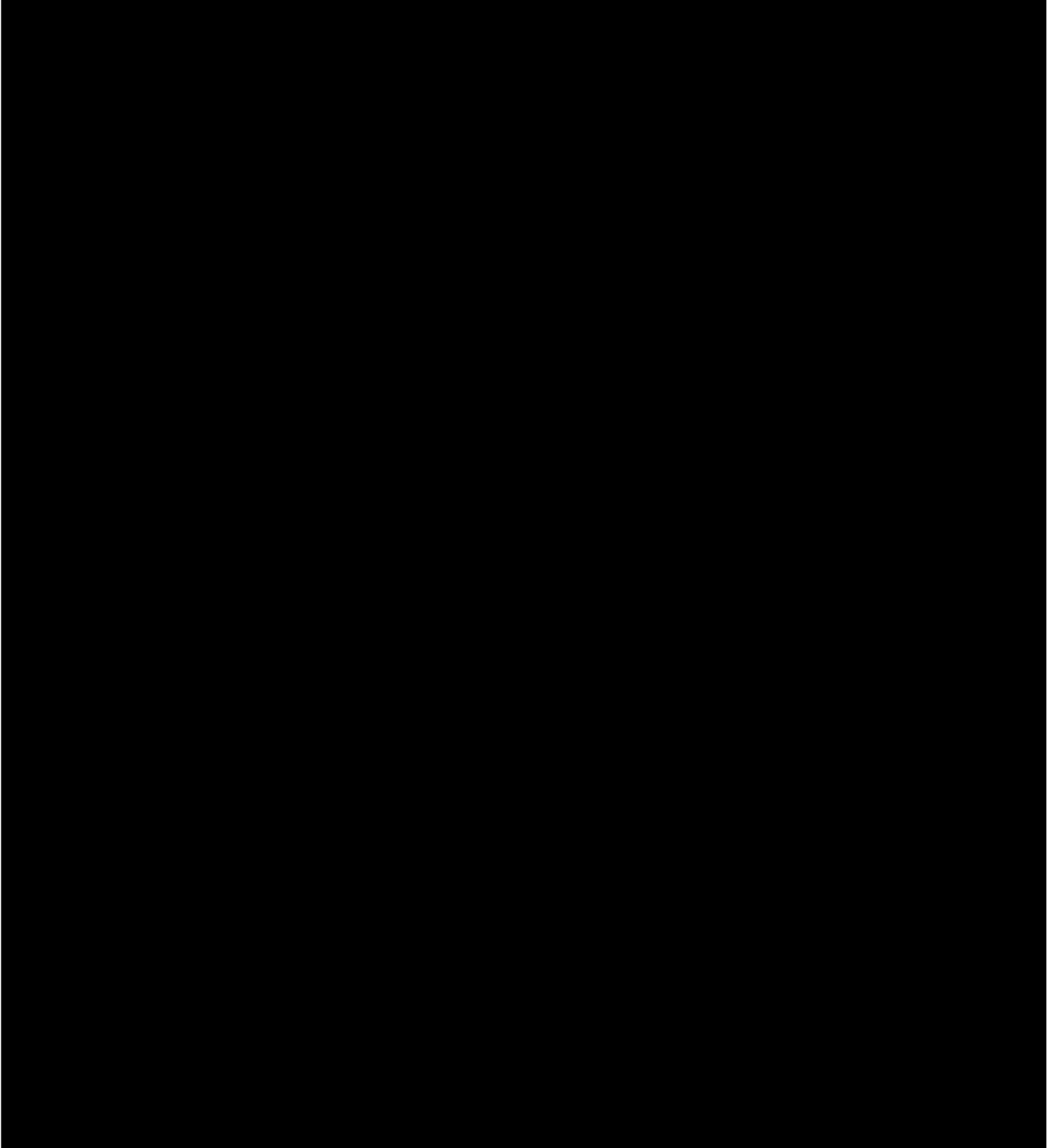




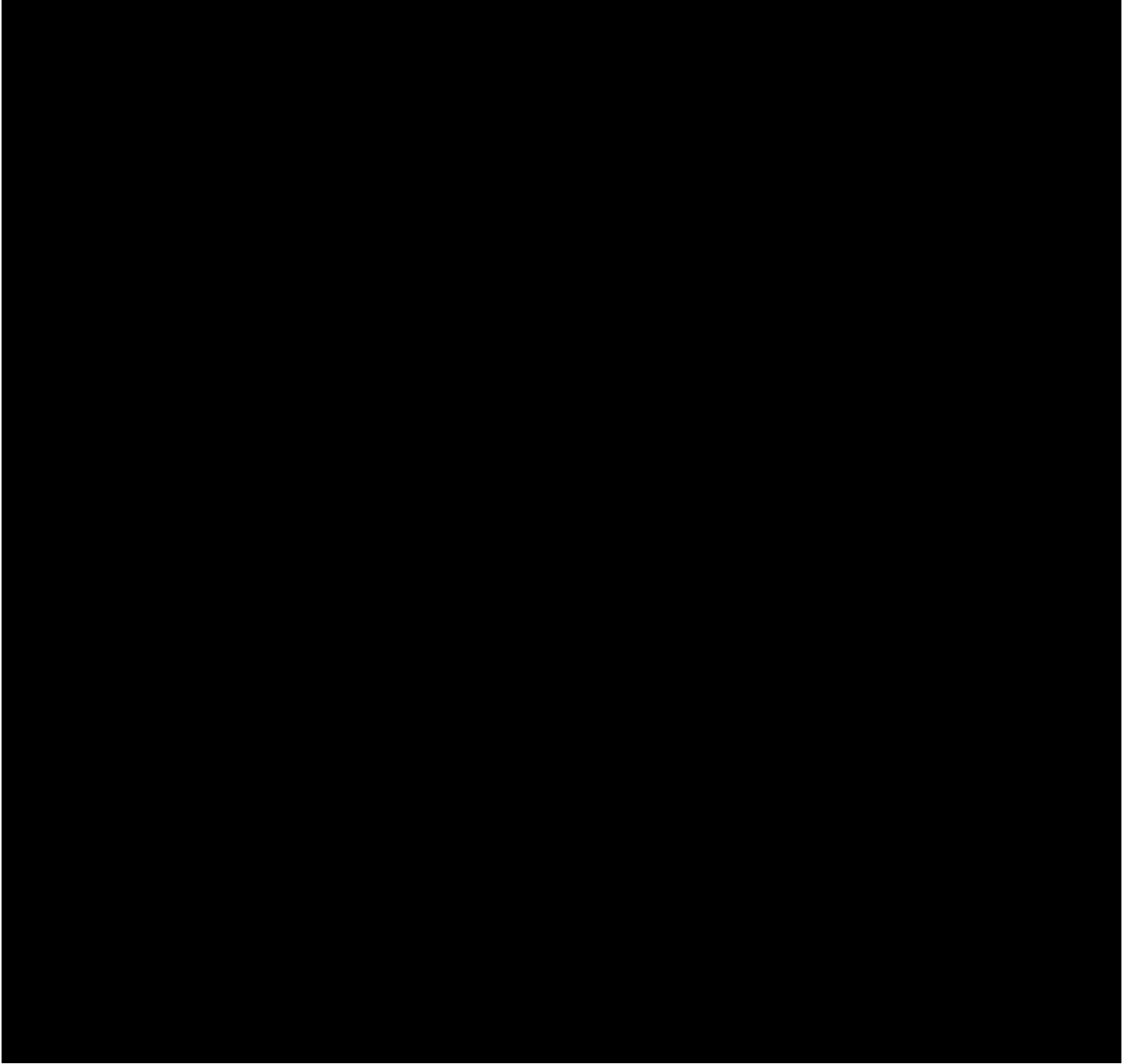




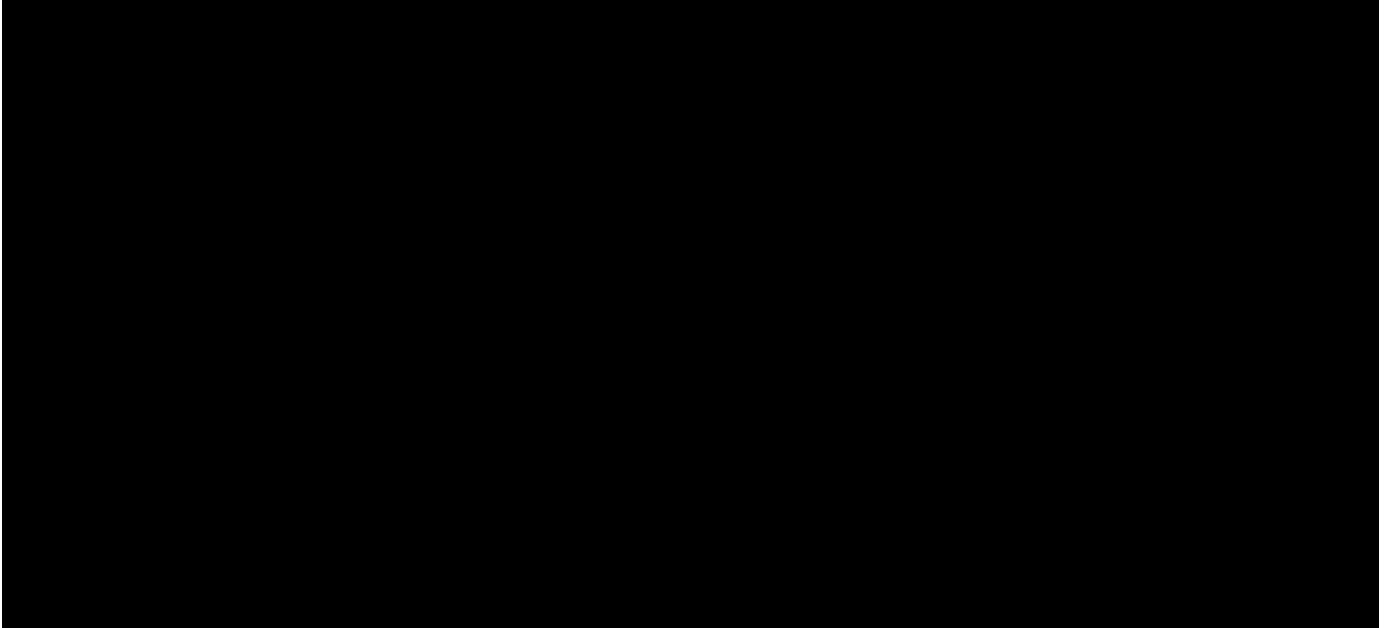
Describe the proposed cannabis facility's Inventory Control System (ICS) and detail the procedures the facility will employ to meet the ICS requirements of Utah Code 4-41a-103 and Utah Administrative Rule related to inventory control. Include a description of how the facility will comply with section 4-41a-2 and use the state Electronic Verification System to track facility agents.



Does the licensee complete Research and Development (Yes or No option). If Yes, add "Attach all Standard Operating Procedures"



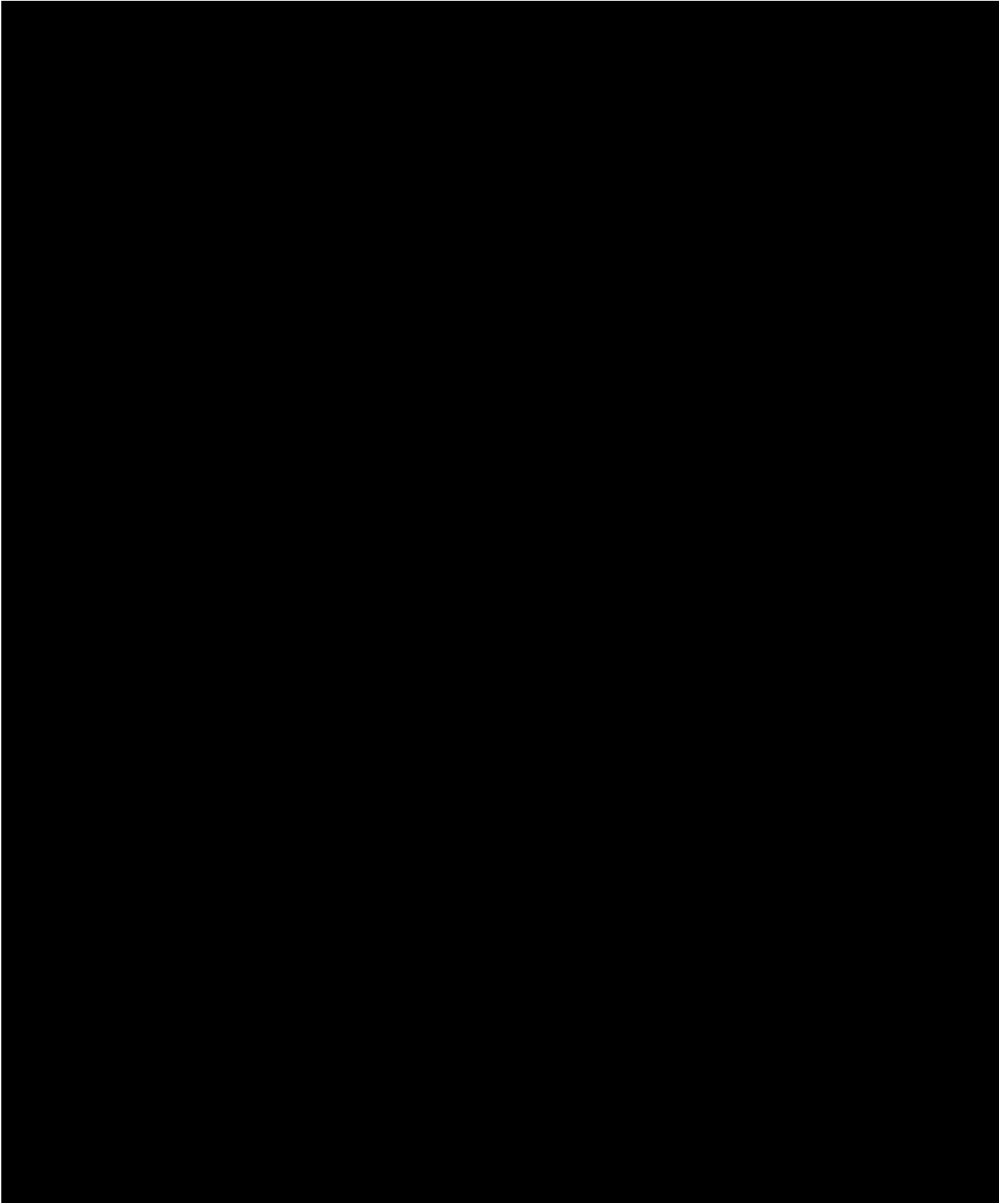
**Provide the proposed cannabis facility storage protocols, both short and long-term, to ensure all cannabis is stored in a manner that is sanitary and preserves the integrity of the cannabis.**



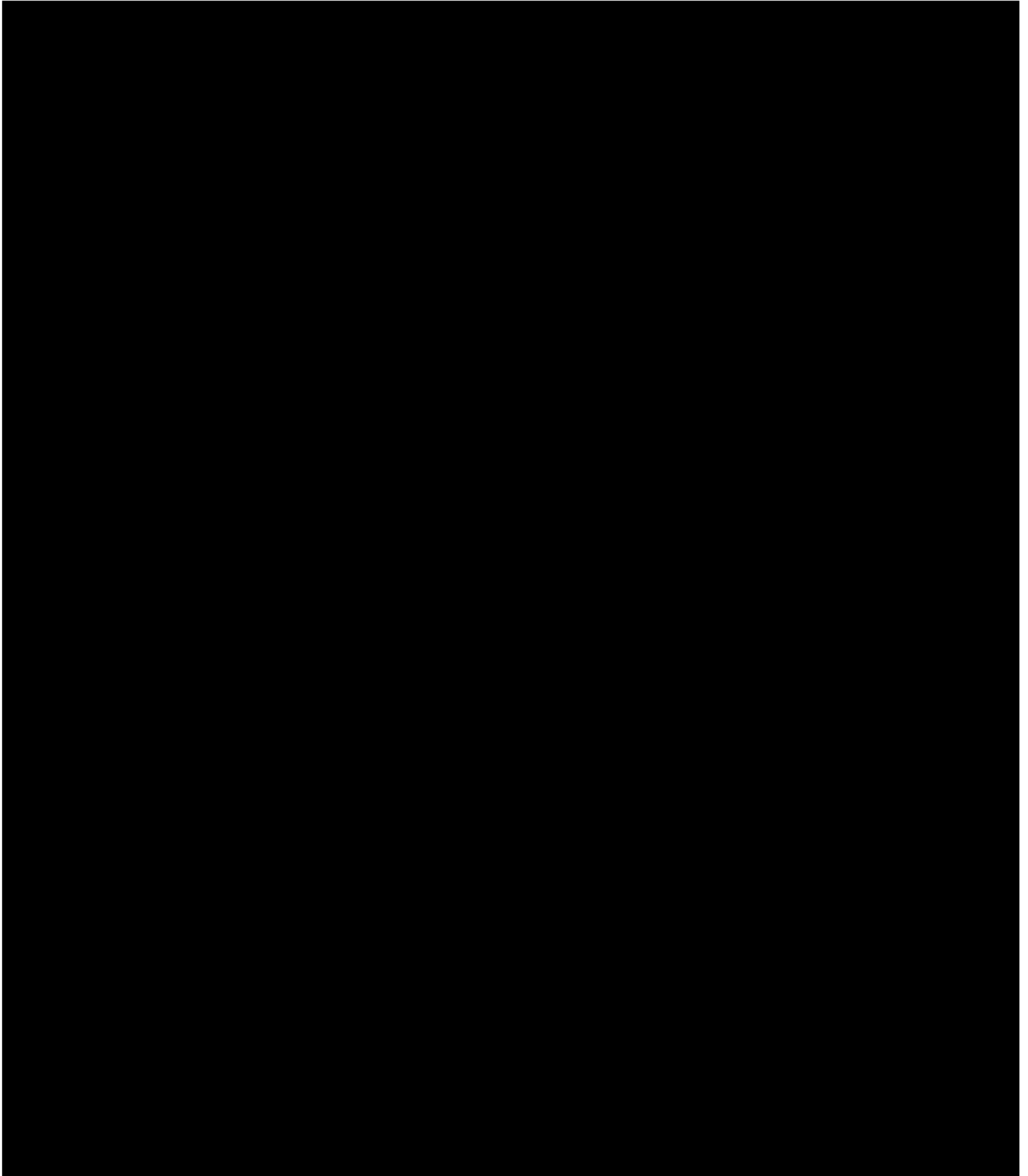
Does this facility process or store hemp?

If Yes then add "Attach Standard Operating Procedure for hemp is stored and blueprint outlining the separation between hemp and cannabis"

Provide procedure for the use of cannabinoid isolate, outlined R66-2-7(5)



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.



the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million, and the number of people aged 75 and over has increased by 1.1 million (Office of National Statistics 1999). The number of people aged 65 and over is projected to increase to 6.5 million by 2011, and the number of people aged 75 and over to 3.5 million (Office of National Statistics 1999).

There is a growing awareness of the need to address the needs of older people in the UK. The Department of Health (1999) has published a strategy for older people, which sets out a vision for a society in which older people are able to live independently and actively, and to participate in the life of their communities. The strategy also sets out a number of key objectives, including: to improve the health and well-being of older people; to support older people to live independently; to promote social inclusion; and to protect the rights of older people.

One of the key challenges facing the UK in the 21st century is how to meet the needs of older people. This is a complex task, as older people have a wide range of needs, and these needs are often complex and interrelated. In order to meet the needs of older people, it is essential to have a good understanding of their needs, and to have the resources and skills to meet these needs.

One of the key areas of research in this field is the study of the needs of older people. This research has identified a number of key areas of need, including: health and well-being; social inclusion; and protection of rights. This research has also identified a number of key factors that influence the needs of older people, including: age; gender; social class; and ethnicity.

One of the key challenges facing researchers in this field is how to measure the needs of older people. This is a complex task, as the needs of older people are often complex and interrelated. In order to measure the needs of older people, it is essential to have a good understanding of their needs, and to have the resources and skills to measure these needs.

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the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million (1990–1999) and is projected to increase by a further 1.5 million by 2010 (Office for National Statistics 2000). The number of people aged 65 and over in the UK is projected to increase from 10.5 million in 1999 to 12.5 million in 2010.

There is a growing awareness of the need to develop strategies to meet the needs of the ageing population. The Department of Health (2000) has published a strategy for ageing, which sets out the government's commitment to improve the lives of older people. The strategy is based on the principle that older people should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of older people, including measures to improve housing, transport, and social services.

The Department of Health (2000) has also published a strategy for dementia, which sets out the government's commitment to improve the lives of people with dementia. The strategy is based on the principle that people with dementia should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of people with dementia, including measures to improve housing, transport, and social services.

The Department of Health (2000) has also published a strategy for mental health, which sets out the government's commitment to improve the lives of people with mental health problems. The strategy is based on the principle that people with mental health problems should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of people with mental health problems, including measures to improve housing, transport, and social services.

The Department of Health (2000) has also published a strategy for physical health, which sets out the government's commitment to improve the lives of people with physical health problems. The strategy is based on the principle that people with physical health problems should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of people with physical health problems, including measures to improve housing, transport, and social services.

The Department of Health (2000) has also published a strategy for social care, which sets out the government's commitment to improve the lives of people who need social care. The strategy is based on the principle that people who need social care should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of people who need social care, including measures to improve housing, transport, and social services.

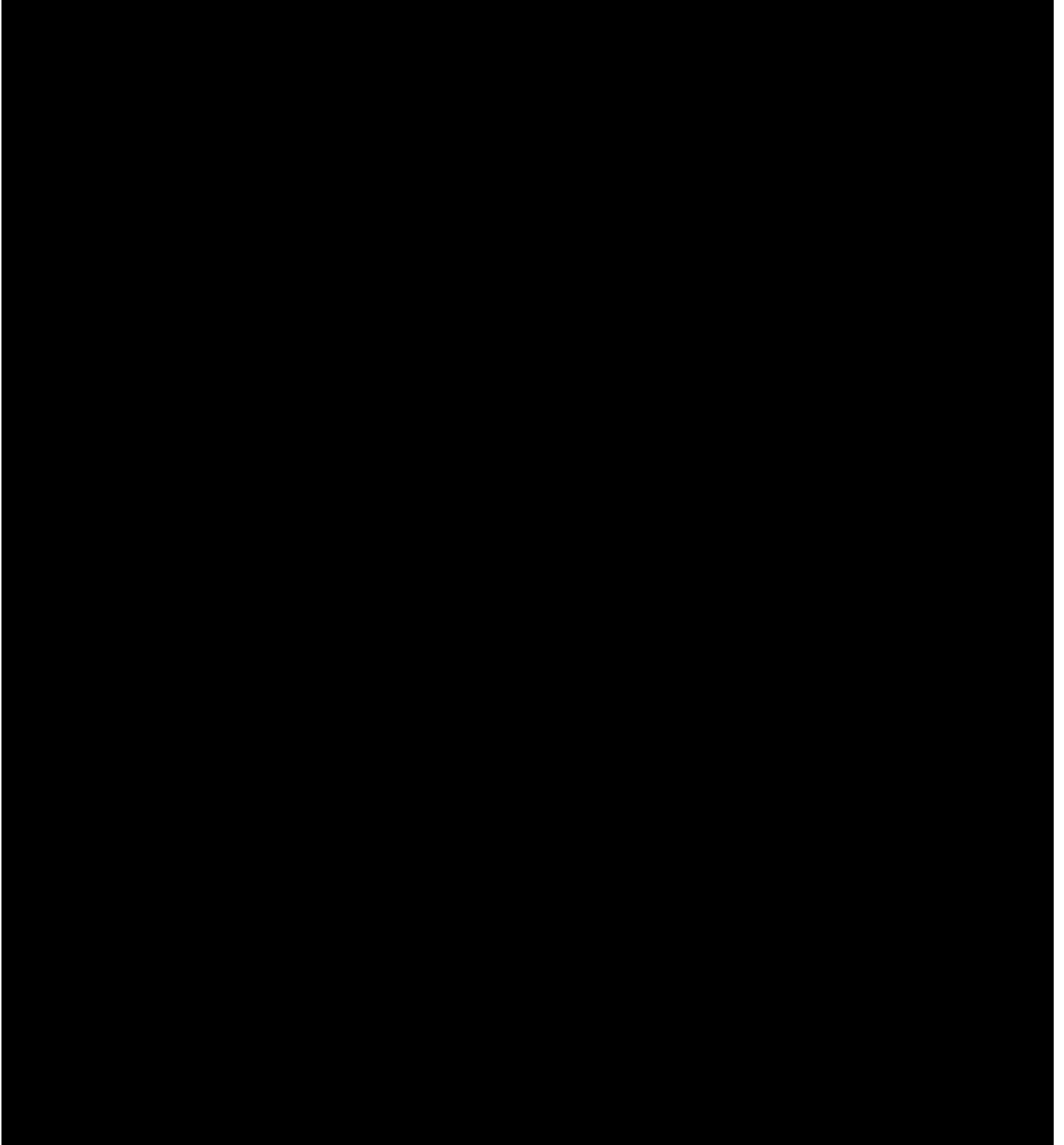
The Department of Health (2000) has also published a strategy for health care, which sets out the government's commitment to improve the lives of people who need health care. The strategy is based on the principle that people who need health care should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of people who need health care, including measures to improve housing, transport, and social services.

The Department of Health (2000) has also published a strategy for public health, which sets out the government's commitment to improve the lives of the population. The strategy is based on the principle that the population should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of the population, including measures to improve housing, transport, and social services.

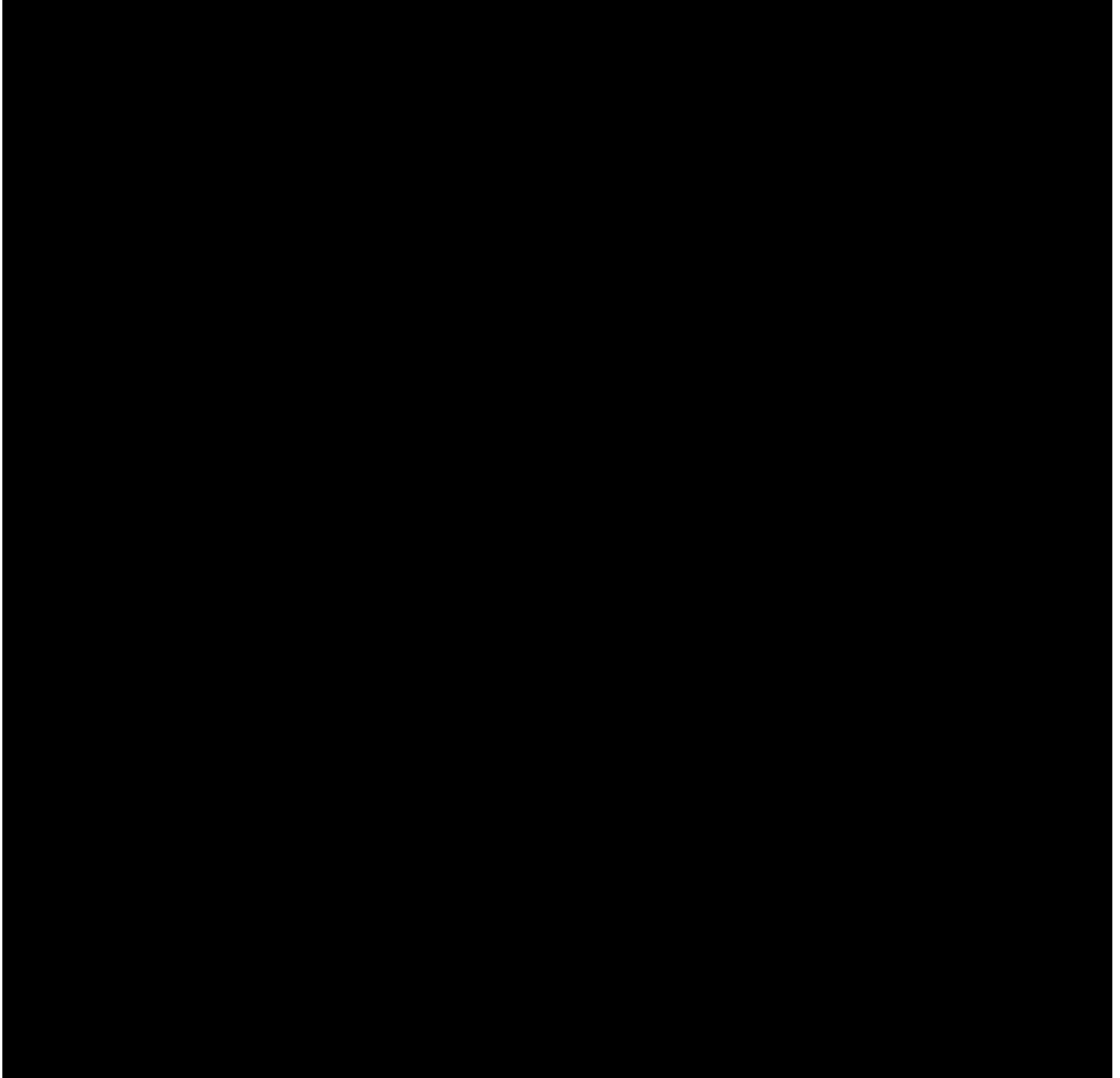
The Department of Health (2000) has also published a strategy for the environment, which sets out the government's commitment to improve the lives of the population. The strategy is based on the principle that the population should be able to live independently, safely and comfortably, and to participate fully in the community. The strategy sets out a range of measures to improve the lives of the population, including measures to improve housing, transport, and social services.



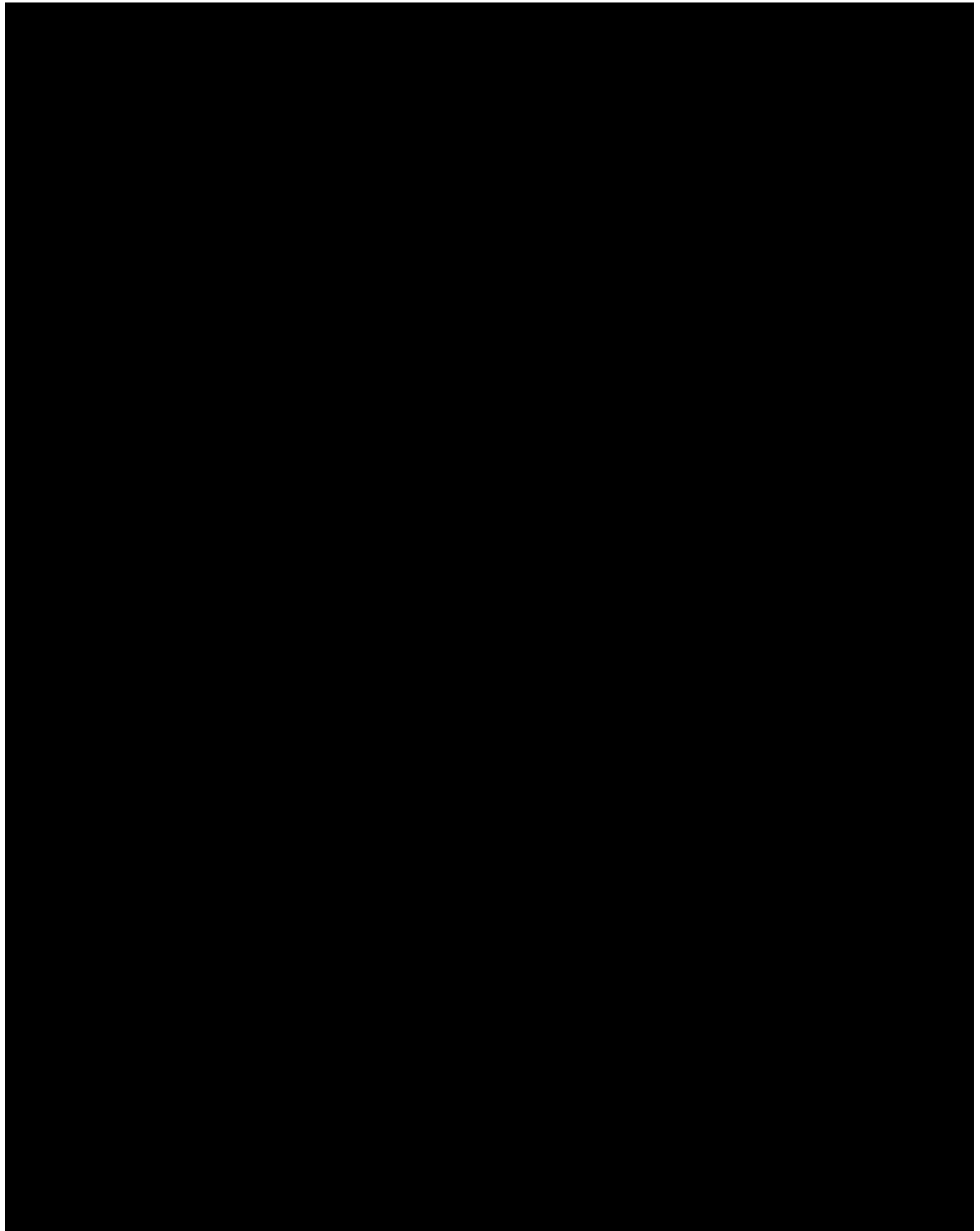
**Provide the proposed cannabis facility's waste disposal plan. Explain how the facility will comply with Utah Code 4-41a-405 and Utah Administrative Rule related to waste disposal.**



**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.**







the 1990s, the incidence of *S. flexneri* has increased in the United Kingdom [10]. In the United States, *S. flexneri* has been reported to be the most common serotype of *Shigella* isolated from children with shigellosis [11].

There is a paucity of data on the epidemiology of *S. flexneri* in the United Kingdom. In the 1980s, *S. flexneri* was the most commonly isolated *Shigella* serotype from patients with shigellosis in the United Kingdom [12]. In the 1990s, *S. flexneri* was the most commonly isolated *Shigella* serotype from patients with shigellosis in the United Kingdom [13].

The purpose of this study was to determine the prevalence of *S. flexneri* in the United Kingdom. The study was designed to determine the prevalence of *S. flexneri* in the United Kingdom. The study was designed to determine the prevalence of *S. flexneri* in the United Kingdom.

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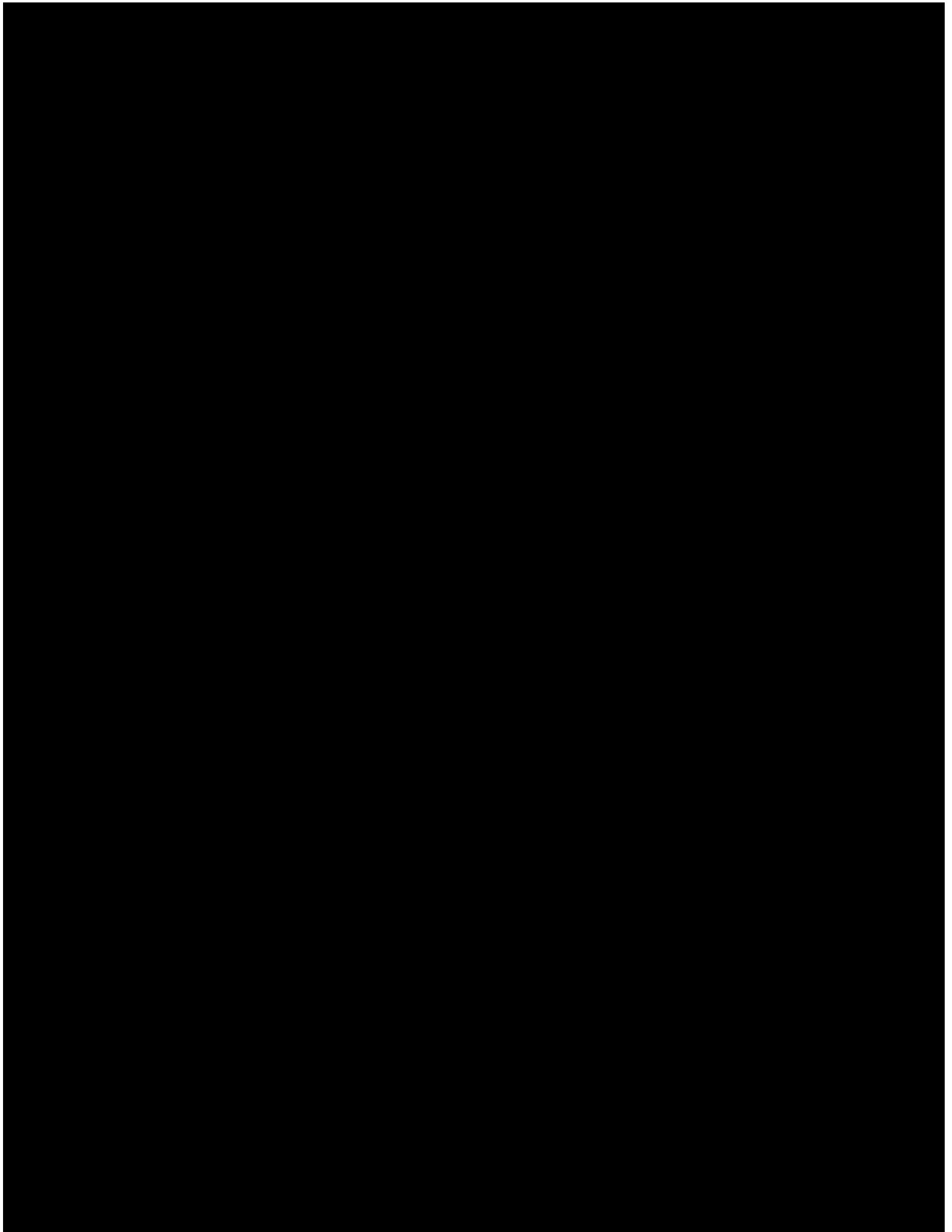
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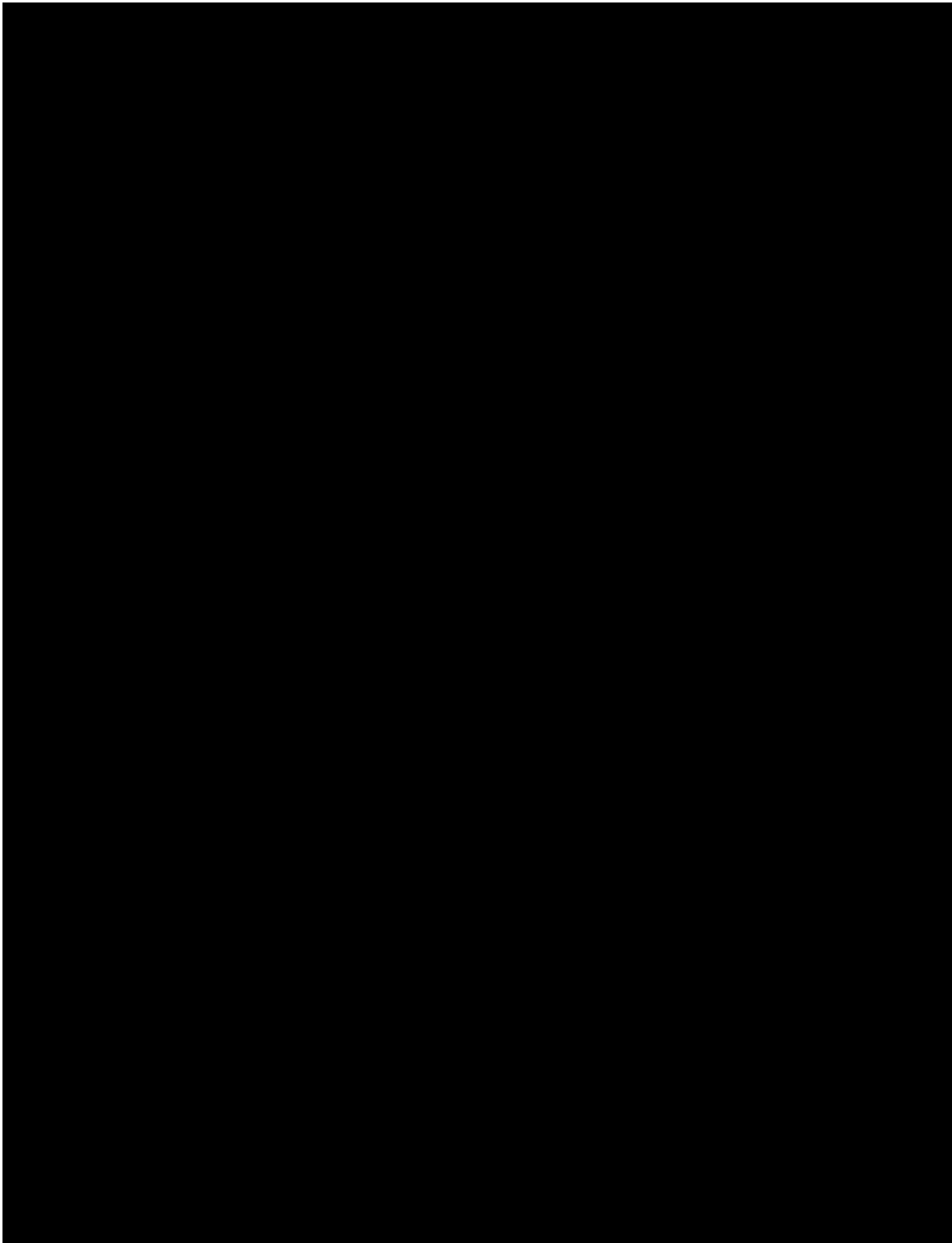
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the 1990s, the number of people in the UK who are employed in the public sector has increased by 1.5 million, from 2.5 million in 1980 to 4 million in 1998. The public sector has become a major employer in the UK, and its growth has been a key factor in the overall growth of the economy.

The public sector has also become a major provider of social services, and its growth has been a key factor in the overall growth of the economy. The public sector has become a major provider of social services, and its growth has been a key factor in the overall growth of the economy.

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the 1990s, the number of people in the UK who are aged 65 and over has increased from 10.5 million to 12.5 million, and the number of people aged 75 and over has increased from 4.5 million to 6.5 million (Office of National Statistics 2000).

There is a growing awareness of the need to develop services to meet the needs of older people, and the need to ensure that the health care system is able to meet the needs of older people. The Department of Health (1999) has identified the need to develop services to meet the needs of older people, and the need to ensure that the health care system is able to meet the needs of older people.

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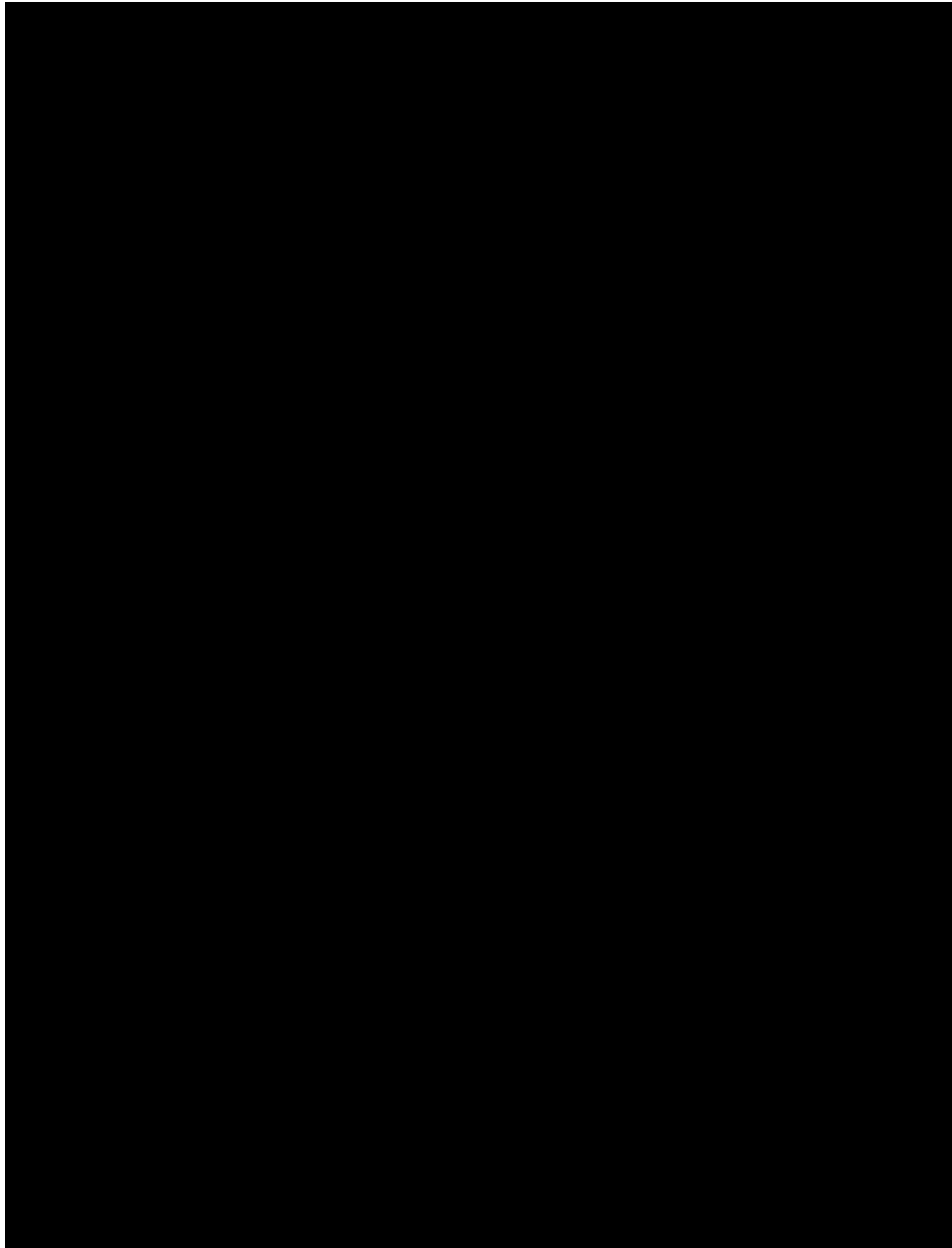
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The first part of the paper discusses the importance of the research and the objectives of the study. It then presents a literature review of the existing research on the topic. The next section describes the methodology used in the study, including the data collection and analysis techniques. The results of the study are then presented, followed by a discussion of the findings and their implications. The paper concludes with a summary of the main points and a list of references.

The research was conducted in a systematic and rigorous manner, following the principles of good research practice. The data was collected from a representative sample of the population, and the analysis was carried out using appropriate statistical methods. The results of the study are presented in a clear and concise manner, and the implications of the findings are discussed in detail.

The findings of the study have important implications for the field of research. They suggest that there is a need for further research in this area, and that the results of this study can be used to inform policy and practice. The paper also highlights the importance of the research and the need for continued efforts to improve our understanding of the topic.

In conclusion, the paper provides a comprehensive overview of the research and its findings. It highlights the importance of the research and the need for continued efforts to improve our understanding of the topic. The results of the study are presented in a clear and concise manner, and the implications of the findings are discussed in detail.









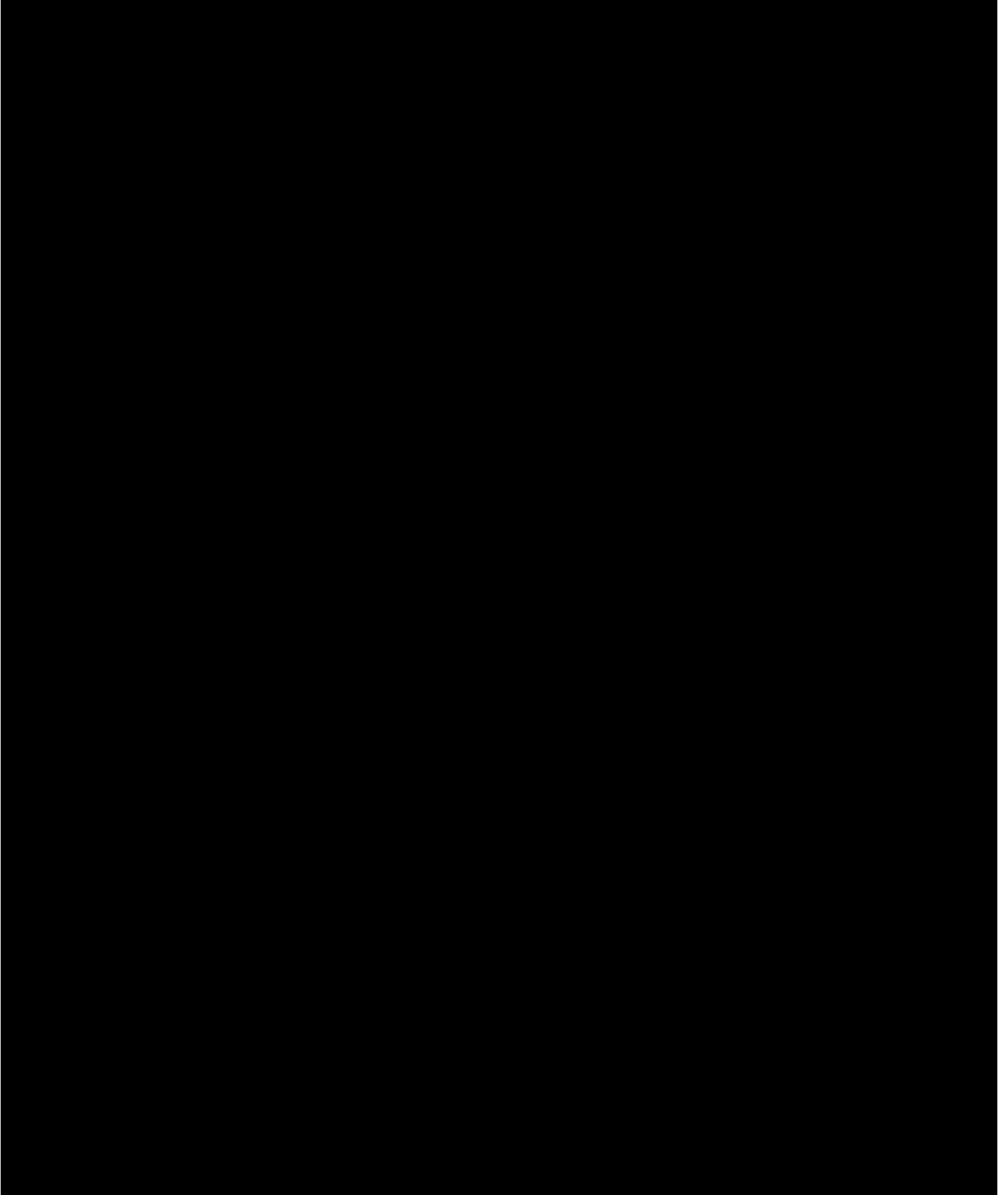




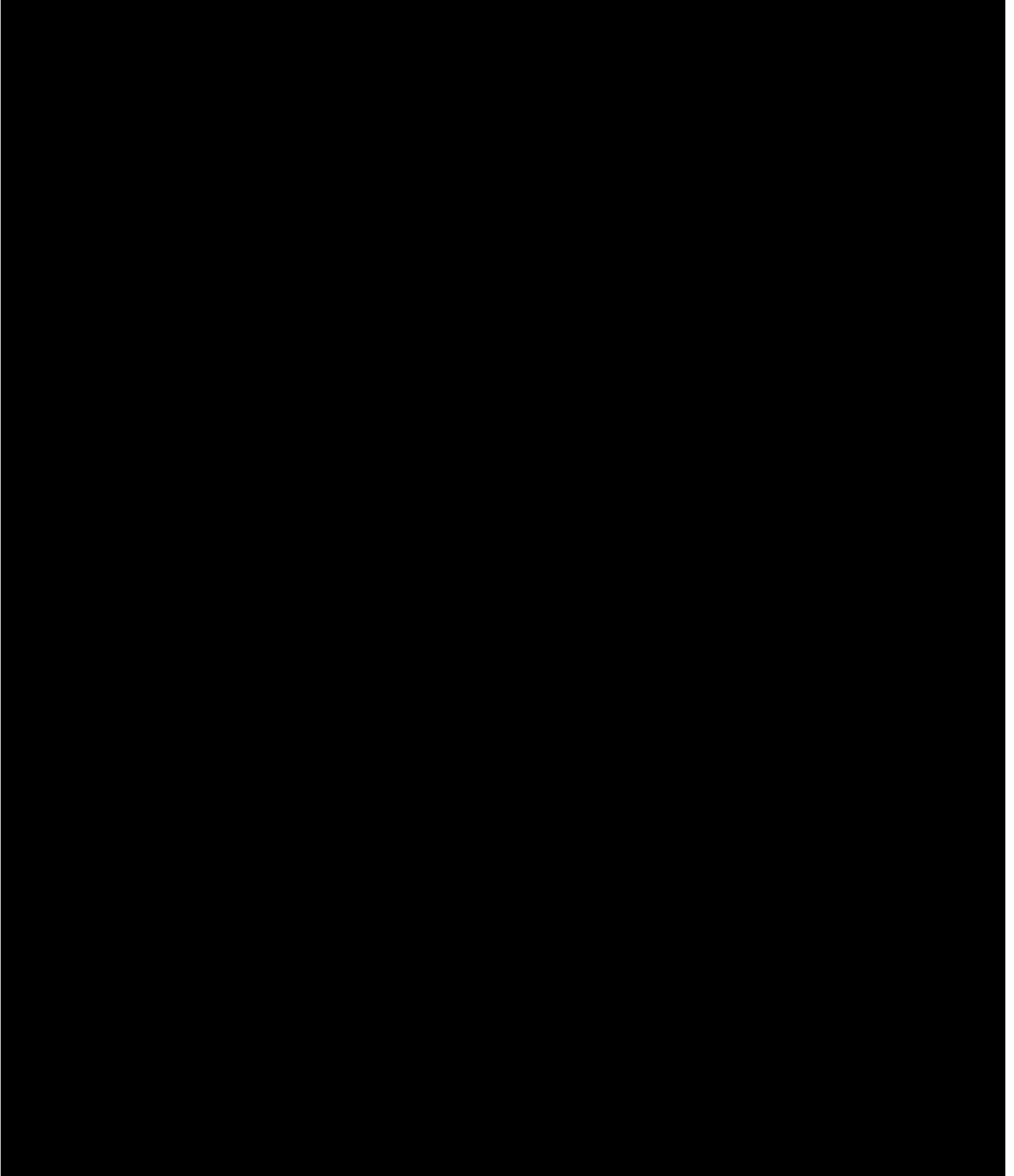
Is the facility doing CBD to THC conversion? If yes, outline the facility's methods.



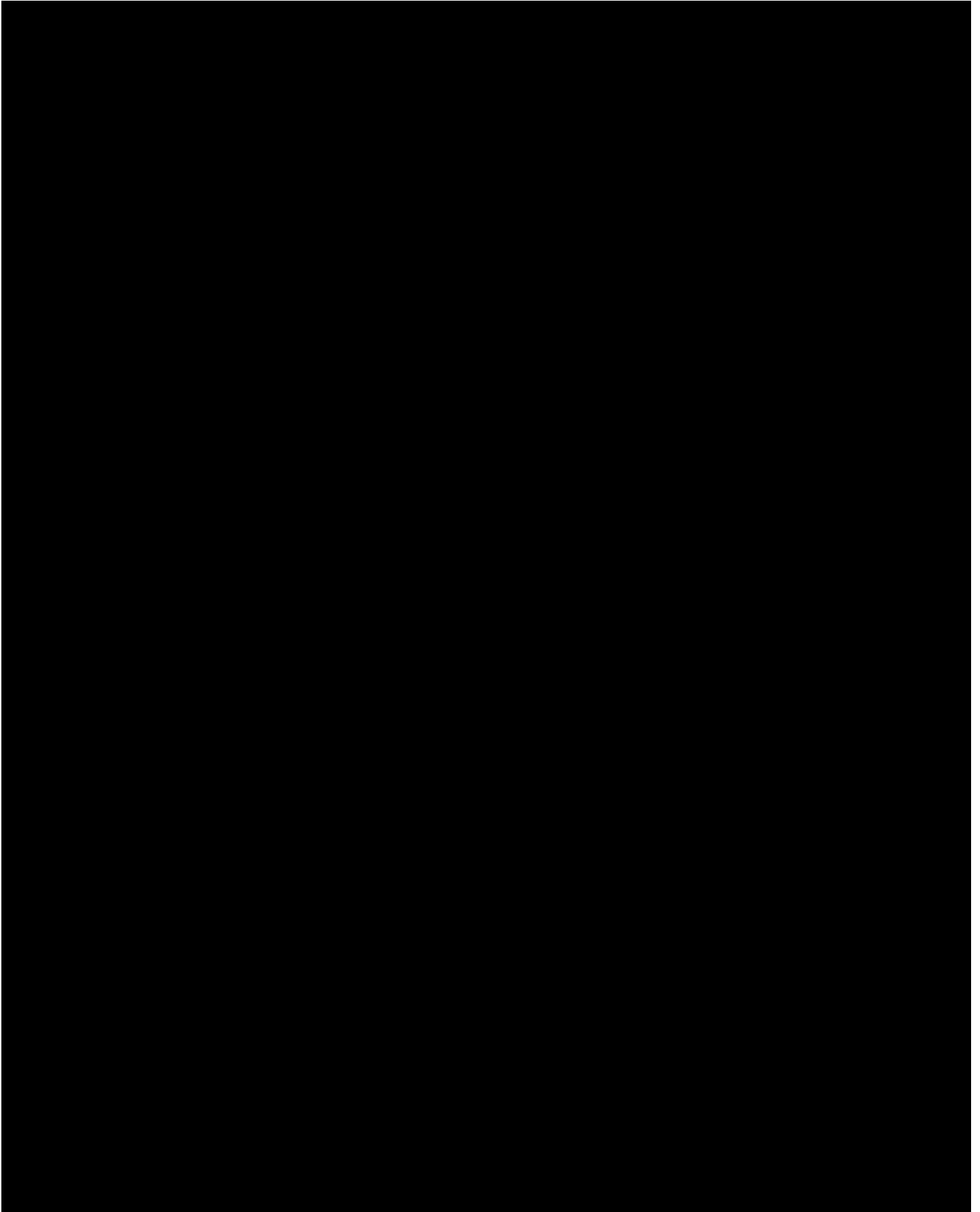
Provide the processing facility's written plan and procedures to handle potential recalls in accordance with R66-2-15. Include:



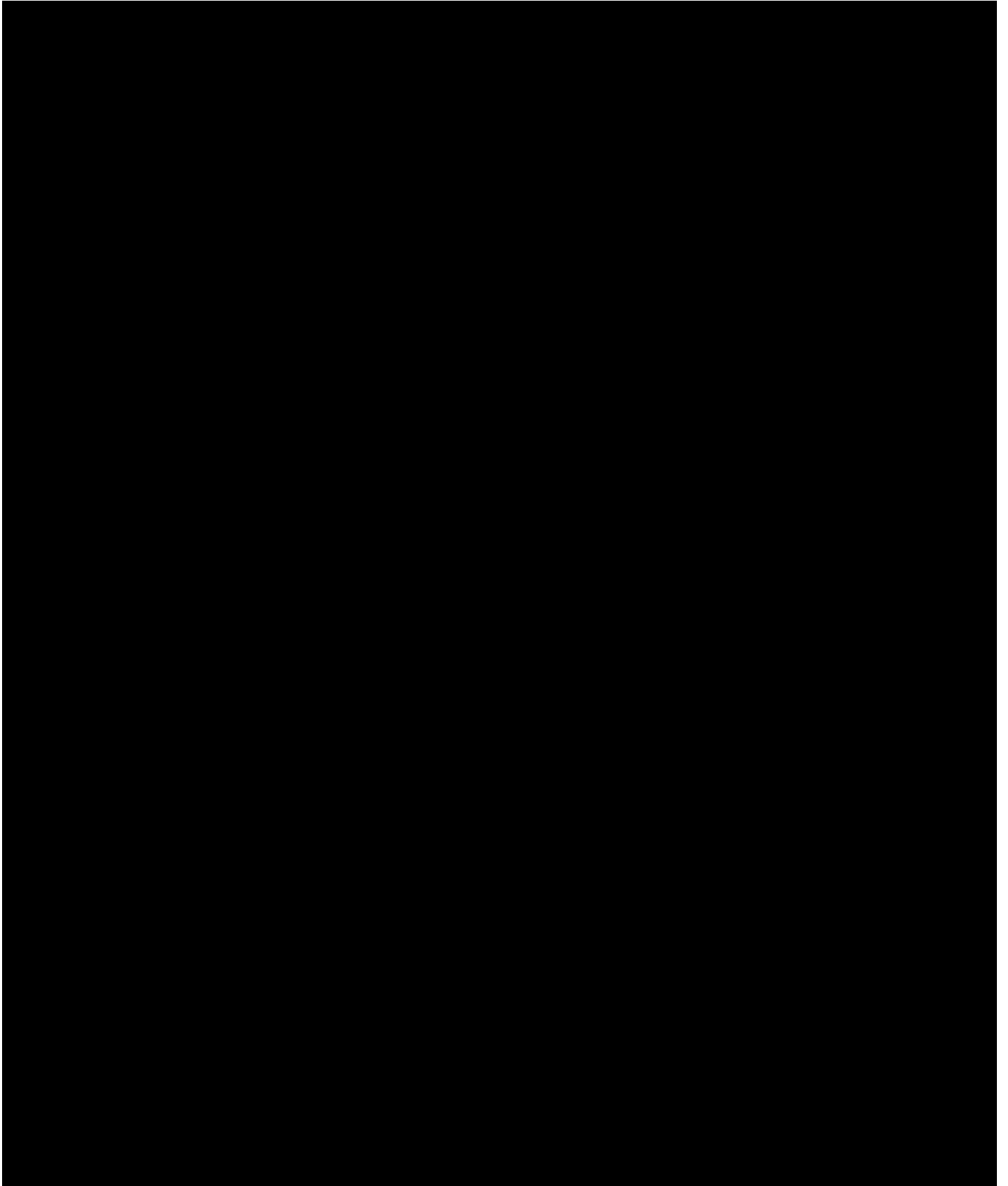
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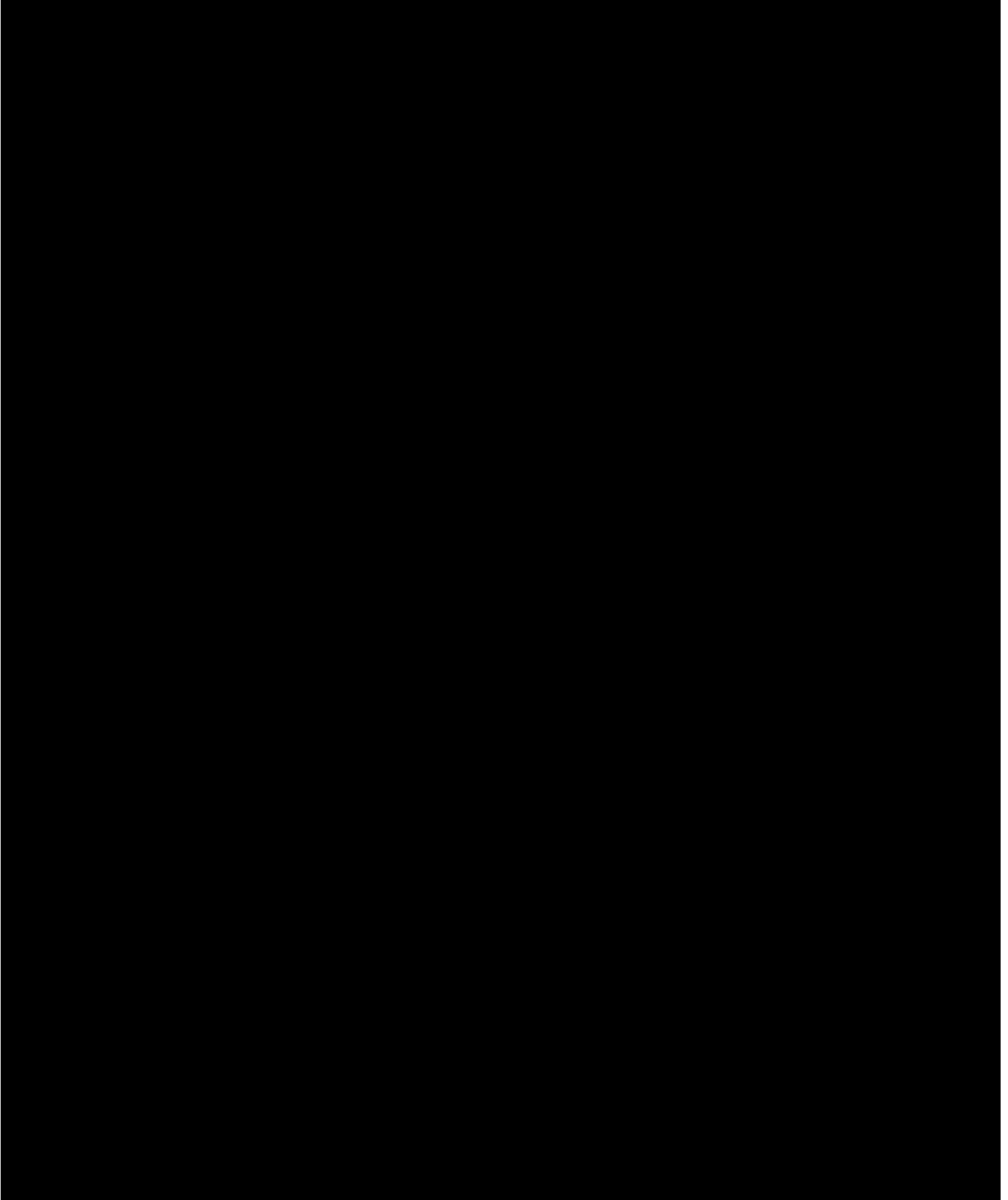
Provide facility's plan for remediation - Product being remediated or destroyed



Submit the facility's plan and procedure to dispose of product that fails quality assurance testing. A destruction plan must be written for every product type produced at the facility and must comply with federal laws, Utah Code 4-41a-405, and Administrative Rule R66-2-17.



In the CFR section, state how you are currently using CFR to package, label, etc (ex. Cleanliness, sanitation, manufacturing, records



the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million, and the number of people aged 75 and over has increased by 1.1 million (Office for National Statistics 2000). The number of people aged 65 and over is projected to increase to 10.5 million by 2026, and the number of people aged 75 and over to 6.5 million (Office for National Statistics 2000).

There is a growing awareness of the need to develop strategies to meet the needs of the ageing population. The Department of Health (1999) has identified the need to develop a 'new paradigm' for health care, which is based on the principles of prevention, promotion, and primary care. The Department of Health (1999) has also identified the need to develop a 'new paradigm' for health care, which is based on the principles of prevention, promotion, and primary care.

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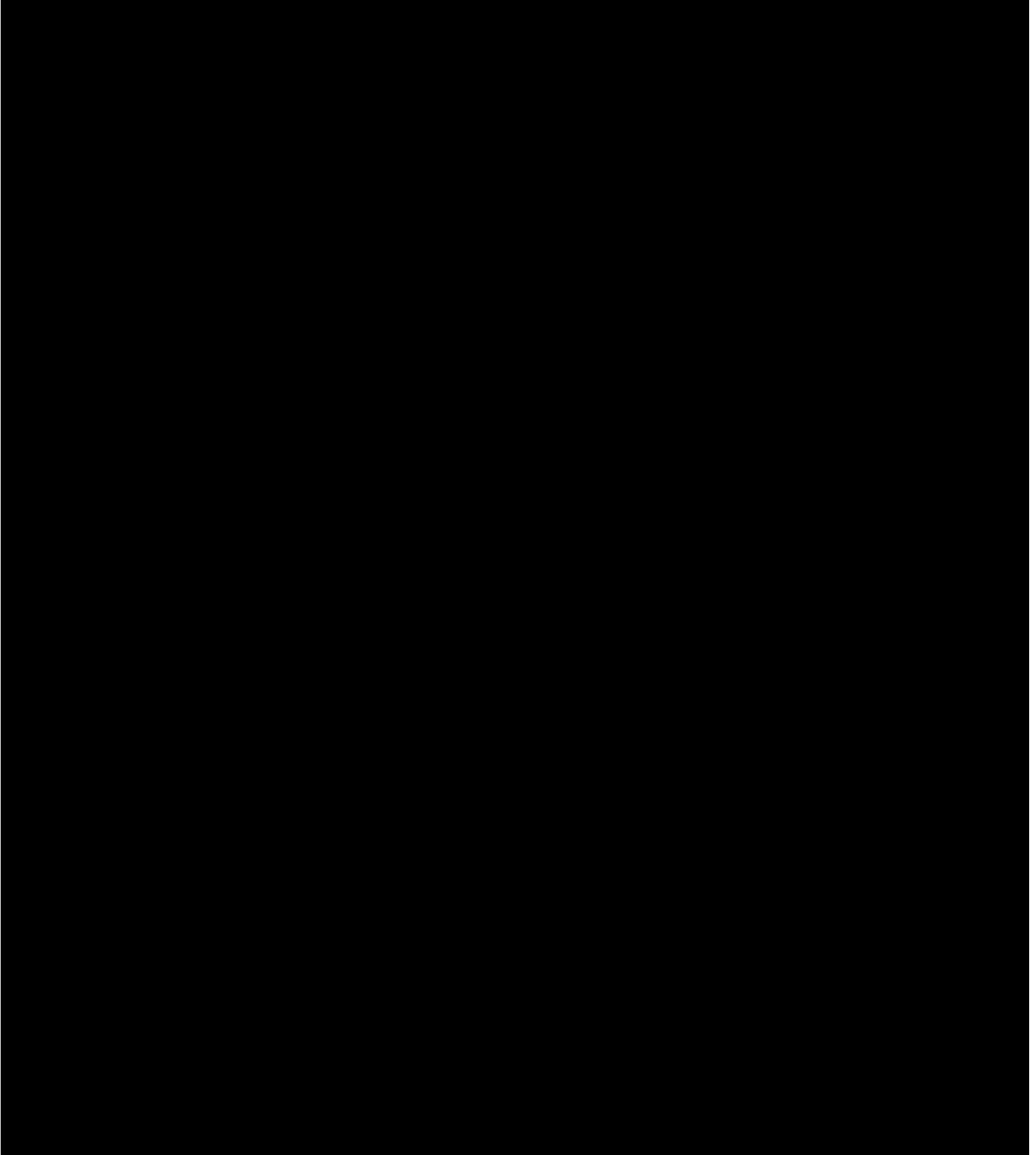
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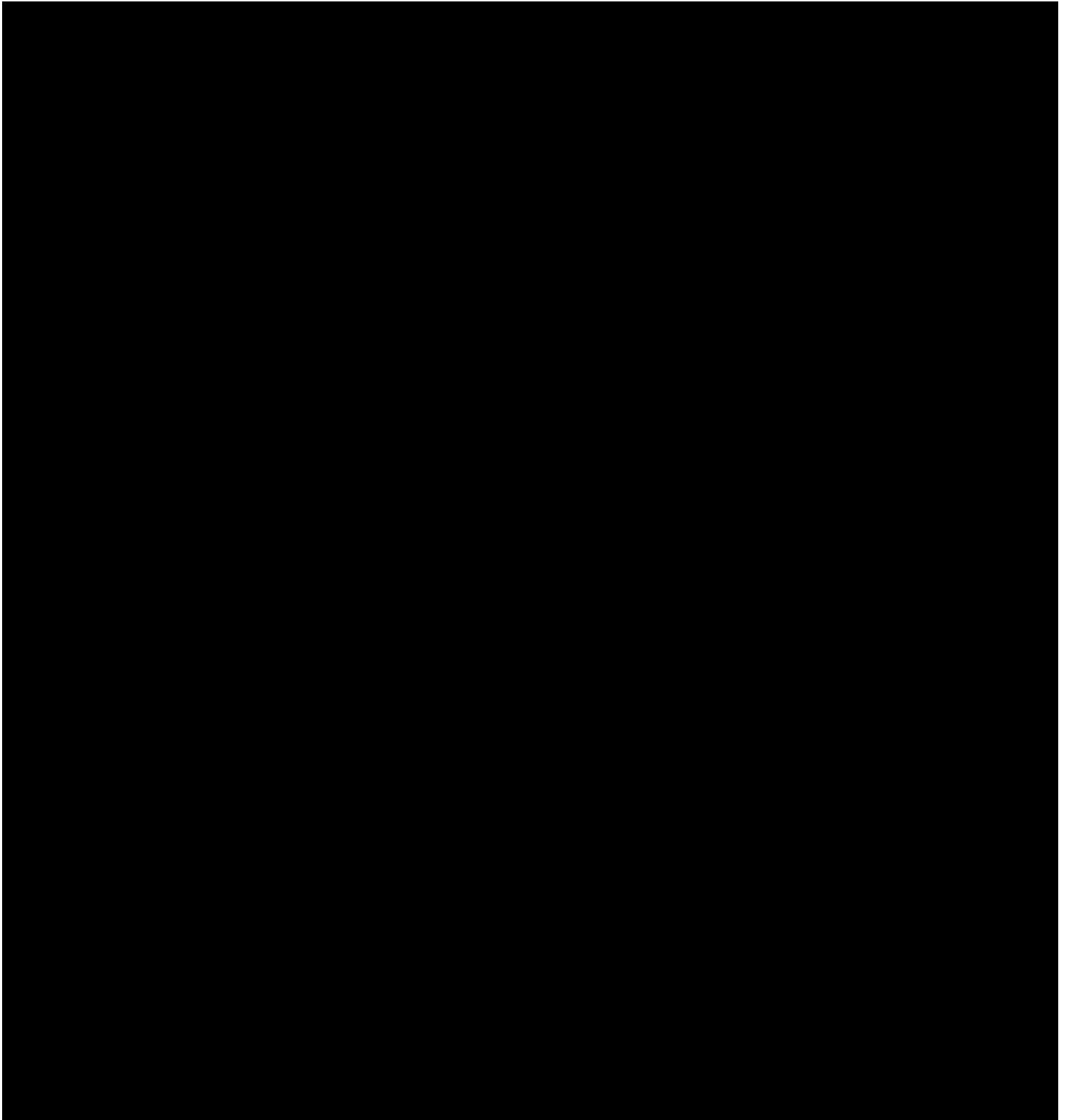




**Provide the facility's plan and procedures to have a representative sample of cannabis products tested by an independent testing laboratory to determine if the product is safe for human consumption.**



**Provide a description of any investigation or adverse action taken by any licensing jurisdiction, government agency, law enforcement agency, or court in any state for any violation or detrimental conduct in relation to any of the applicant's cannabis-related operations or businesses**

A large black rectangular redaction box covers the majority of the page, obscuring all content below the instruction. The box is solid black and extends from the left margin to the right margin, and from just below the instruction to the bottom of the page.



[REDACTED]

