

Although the Pono application had exceeded all of the qualifications for licensure established by the Hawaii Legislature, nevertheless, the DOH informed Pono that, “Your application rank: 3rd among applications submitted for the county of Honolulu” . . . Receipt of an application evaluation score lower than the successful applicants for the respective county.” *See Letter dated June 16, 2016 from Margaret Leong to William Jarvis and Pono which was received by Pono on June 20, 2016 (the “June 16 Letter”), a copy which is attached hereto as Exh. “1.”*

“Haw. Rev. Stat. §§ 342-13, 91-14(b), and constitutional due process mandated an agency hearing of issues affecting property rights.” *Pele Def. Fund v. Puna Geothermal Venture*, 77 Haw. 64, 65-66 (1994). Pono’s rights have been affected greatly by the DOH decision to deny its license application. This constitutes Pono’s Notice of Appeal and Pono hereby requests a formal contested case hearing on the Pono license application and the reasons for its denial.

Throughout its review and the selection process, communications from the DOH were opaque and vague, in stark contrast to the transparency exhibited in the application provided by Pono. As such, the DOH review and selection process lacked public scrutiny and Pono was denied due process or even the ability to determine if the DOH had made simple mistakes in the selection criteria, process, and results.

Although Pono has been provided little information and documents from the DOH, Pono still has uncovered the following errors or omissions by the DOH and reserves the right to raise additional errors as documents and information are uncovered and released during the Appeal process. These errors and omissions include the following:

1. On March 21, 2016, five Panel members were announced providing these Panel members with less than one month to properly critique and score over 60 applications. The lack of a reasonable time-frame in which to properly review and score the applications negatively

prejudiced Pono. Furthermore, the DOH decision to proceed with only four Panel members late in the application scoring process following the April 8, 2016 removal of Dr. John Fisher prejudiced Pono.

2. The license selection process was arbitrarily weighted in a manner that did not promote the selection of the most qualified applicant.

3. The DOH failed to perform the necessary due diligence of applicants mandated by the Hawaii Legislature, specifically, that the DOH review and verify the information and documentary materials submitted in the applications and determine that those materials were true and valid. This lack of due diligence by the DOH prejudiced Pono.

4. DOH has never released its scoring for the items included in applications, or the weighting assigned to each category, making it impossible to evaluate whether the scoring by the Panelists was reasonable or arbitrary or capricious, whether the scoring complied with the statutory requirements or even whether the arithmetic used in designating the eventual licensees was accurately performed. For example, in HRS Chapter 329D, the Hawaii Legislature authorizes the DOH to award a total of eight licenses: **three** licenses for the City and County of Honolulu. In its June 16 Letter, the DOH informed Pono that “your application rank: **3rd** among applications submitted for Honolulu.” June 16 Letter, Exh. “1” hereto (emphasis added). Thus, based on the ranking list in the June 16 Letter, it appears that Pono should have been awarded a license for the City and County of Honolulu.

II. STANDARD OF LAW

The Hawaii Legislature has established a framework for Medical Marijuana Dispensaries license application procedure and verification. HRS Chapter 329D. Pursuant to HRS 329-21, “all proceedings for denial, suspension, fine, or revocation of a license on any ground specified

in subsection (a) shall be conducted pursuant Chapter 91, including the right to judicial review.” HRS § 329D-21(2)(d). Moreover, the Hawaii Legislature provided that the DOH “shall adopt rules pursuant to Chapter 91 to effectuate the purposes of this chapter.” HRS §329D-27.

As such, Chapter 11-850 of the Hawaii Administrative Rules was adopted. Although these administrative rules purport to adopt the Hawaii Legislature’s intent, the DOH exercise of its authority during the recent licensing application and selection process, through its decisions and various press releases discussed herein, proved woefully inadequate and as a result forced the DOH to adopt rule changes during the actual licensing application process and scoring. DOH’s conduct was arbitrary, capricious, and exceeded its statutory authority and/or the jurisdiction of the agency. Moreover, the secretive nature of the panel review process and license application selection process constituted an unlawful procedure, was arbitrary and capricious and/or characterized by an abuse of discretion or a clearly unwarranted exercise of discretion.

On June 20, 2016, Pono was served with its Notice of Denial of its license application. “If the Department denies an application for or renewal of a license, the Department shall notify the applicant in writing of the Department’s decision, including the reason for the denial.” HAR 11-850-24(b). “A person aggrieved by a decision made pursuant to this section may appeal in accordance with this chapter.” HAR § 11-850-24(c). The Notice of Denial specifically provided that, “You have a right to appeal the decision within 20 days of receipt of this Notice pursuant to Section 329D-21, HRS, and Sections 11-850-24 and 11-850-1011, HAR.”

“When an applicant who has not received a license requests a hearing pursuant to section 329D-21, HRS, the Department shall timely post that application request on its website.” HAR §

11-850-101(e). Any hearing conducted under this section shall be conducted as a contested case under Chapter 91 HRS and Chapter 11-1.

Accordingly, herein, Pono files a Notice of Appeal of the DOH decision contained in the June 16 Letter (served on Pono on June 20, 2016). Pono hereby requests a contested case hearing pursuant to Chapter 91.

III. DISCUSSION

(i) Background.

On or about May 15, 2015, William Jarvis (“Jarvis”), Duane Fisher (“Fisher”), and Kenneth Marcus (“Marcus”), filed Articles of Incorporation for Pono Organics Investors, LLC, an entity doing business as Pono Wellness. Pono was created with the intention of applying for a medical cannabis production and dispensary license from the State of Hawaii.

For over eight months, Jarvis led a team devoted to submitting a perfect application. Between May 2015 and January 2016, Pono spent over Two Hundred Thousand Dollars (\$200,000) to meet the application requirements set out by the DOH.¹ Pono’s Application included substantive discussion and demonstrations that Pono had already secured the following:

- Hired a full-time project manager to oversee the Application process;
- Hired a professional cannabis consulting firm, who, prior to the Application, had operated cannabis businesses for many years in Colorado and are well-known for the quality of their medicine;
- Raised over Six Million Dollars (\$6,000,000.00) in funding for Pono (all from Hawaii residents or institutions)

¹ Each of these qualifications are described in detail in Pono’s Medical Marijuana Dispensary License Application No. 3443 filed January 29, 2016 (the “Application”).

- Conducted a nation-wide recruiting process, resulting in the hiring of three key employees out of hundreds of applications;
- Assembled an Advisory Panel consisting of 16 expert professionals in their fields, ranging from pain management, nursing care, ethnobotany, cannabis sciences, HIPPA compliance, Pharmaceutical operations, and patient advocacy;
- Developed a 111-page financial model based on heavily researched industry data and analysis, predicting revenues, costs, and cash flow for five years;
- Developed and created an 86-page business plan containing detailed information on the mission, business philosophy, logistical processes, financials, and key benchmarks put in place by Pono;
- Developed and created a 45-page turnkey security plan for the first production and retail locations (which included an agreement with a local Hawaii security company to fulfill the requirements set out both by Statute and the Pono security plan);
- Secured and executed a lease for an isolated 20+ acre parcel of land and a 10,000 square foot facility to serve as the primary production location;
- Secured a letter of intent for the purchase of a second parcel of land (8 acres), on which to build a second production facility;
- Secured and executed a lease for a proven retail location in the heart of Honolulu;
- Secured a letter of intent for a second retail location;
- Opened two business banking accounts – one with American Savings Bank, and one with West Oahu Community Federal Credit Union (the latter of which was

accompanied by a letter from the Chairman of the Board explicitly acknowledging that they intended to do business with Pono post-license);

- Conducted 23 State and Federal background checks to include all Pono members, officers, employees, and advisory board members;
- Compiled over 1,400 unique pages of supporting addenda material to accompany the Application, providing documentation to support all claims and statements made in Pono's Application narratives as well as letters of recommendation from the Hawaii Dispensary Alliance and the Hawaii Medical Association.

On or about December 29, 2015 and December 30, 2015, Pono sent multiple emails to the DOH requesting clarification in regard to the DOH's dispensary license rules. Pono never received a response to its emails, and no issues raised by Pono were ever addressed by the DOH in its FAQs.

On January 29, 2016 at approximately 2:30 a.m., Pono properly submitted its Application to the DOH. After receiving a verification code from the DOH, at approximately 1:00 p.m. on January 29, 2016, Pono paid the Five Thousand Dollar (\$5,000.00) license application fee in person at the DOH's office in Kapolei, Hawaii.

On or about April 7, 2016, the DOH informed Pono via email that Pono would be required to provide fingerprints for each owner, principal, and member of Pono by April 12, 2016. Within this written request was the caveat that the DOH would be unable to provide advice to applicants in regard to which Pono personnel would be required to submit fingerprints. Pono complied with the request and, on April 12, 2016 at approximately 11:00 a.m., Pono

submitted approximately 12 sets of fingerprints for the DOH's approval. Pono spent approximately \$698.10 during this process in fingerprint screening fees.

The public and the applicants were originally told by the DOH that the Application review would be conducted by a panel of five members (the "Panel"). *See* DOH News Release dated March 21, 2016. On April 8, 2016, one week before the licenses were to be announced, the DOH posted a News Release on its website in which it announced, among other things, that one of the Panel members, John Fisher, "would be unable to fully participate in the selection and his scoring will not be included." *See* DOH's April 8, 2016 News Release p. 1, ¶ 2. The DOH April 8 News Release, further stated, in pertinent part, as follows:

"It has just recently come to my attention that Dr. John Fisher, through no fault on his part, was not able to continue with his review. I'm not at liberty to share more details, in the interest of Dr. Fisher's privacy. We thank him for his time and assistance to date and wish him well."

The review and selection of the applicants will continue with the remaining four panel members. "We believe the review will be sufficiently rigorous with the remaining four members of the panel," said Director of Health, Dr. Virginia Pressler.

Id. p. 1.

(ii) The DOH Elects To Proceed With A Selection Panel Of Only Four Members.

The DOH provided no further information as to the reasons for Dr. Fisher's removal from the Panel, and, to date, has provided no further information to the public or to the applicants (including Pono). Moreover, since the scoring of the applicants was held by the DOH in secrecy, it is unclear whether scoring of the remaining four members of the Panel, as opposed to the original Panel of five, was sufficiently rigorous.

On April 13, 2016, the DOH posted a News Release on its website which informed the public that the announcement for license winners would be delayed from April 15, 2016 to April 29, 2016. On April 29, 2016, the DOH posted a News Release on its website announcing the selection of the eight applicants who would be issued Marijuana Dispensary Licenses. Pono was not listed as a successful applicant on April 29, 2016. Pono was not one of the applicants awarded a license on April 29, 2016. *See* April 29, 2016 DOH News Release. In this April 29 News Release, the DOH also informed the public of the following:

“Upon the completion of the selection process and the awarding of licenses, the Department of Health will begin working with the selected licensees to ensure the safety of their products, and the safety of patients and the public,” said State Health Director Dr. Virginia Pressler. “We look forward to improving access to marijuana for registered patients who have medical needs, and increasing educational opportunities for healthcare professionals.”

After receiving more than 60 applications in January, the department conducted a rigorous review and selection process. A four-member selection panel reviewed and scored applications based on thirteen merit criteria, some of which include the ability to operate a business, a plan and timeline for operations, proof of financial stability, ability to comply with security requirements, and capacity to meet patient needs.

A dispensary licensed pursuant to Chapter 329D, HRS, may begin dispensing marijuana no sooner than July 15, 2016, with the approval of the Department of Health. Each dispensary licensee may operate up to two production centers and two retail dispensing locations within the county they are licensed to serve. Margaret Leong, Supervisor for the Medical Marijuana Dispensary Licensing Program, explained that, “There are many steps the dispensaries will need to take in order to actually start production and dispensing, so we can’t say exactly when the dispensing will begin. But we are excited to start working with the selected licensees on the next steps.” Pursuant to section 11-850-20, Hawaii Administrative Rules, the Department is holding unselected applications in reserve to offer a license to the next highest scoring applicant if the selected applicants fail to timely pay the required licensing fee. When all available licenses have been issued, the unselected applications will be removed from the list of reserved applications and the Department will notify all applicants of their status, at which time they will have an opportunity to appeal the denial.

The department will post a list of the total scores received by applicants upon completion of the awarding of licenses, which is anticipated to be completed within the next two weeks.

See April 29, 2016 Department News Release p. 2.

Between April 29, 2016 and June 20, 2016, Pono sent multiple emails to the DOH requesting a score and a rationale behind the DOH's scoring. To date, no response to these emails has ever been received by Pono from the DOH.

(iii) Pono Ranks "3rd Among Applicants Submitted For The County of Honolulu."

On or about June 20, 2016, after multiple requests by Pono to DOH for a score and its rationale, Pono received a form letter from the DOH stating, "your application rank: 3rd among applications submitted for the county of Honolulu." Specifically, the June 16 Letter stated as follows:

X Your application rank: 3rd among applications submitted for
the county of Honolulu

* * * *

(5) Receipt of an application evaluation score lower than the successful applicants for the respective county;

* * * *

You have a right to appeal the decision within 20 days of receipt of this notice pursuant to section 329D-21, HRS, and sections 11-850-24 and 11-850-101, HAR.

See June 16 Letter, Exh. "1" hereto.

In HRS Chapter 329D, the Hawaii Legislature authorizes the DOH to award a total of eight licenses: **three** licenses for the City and County of Honolulu. In its June 16 Letter, the DOH informed Pono that "your application rank: **3rd** among applications submitted for Honolulu." June 16 Letter, Exh. "1" hereto (emphasis added). Thus, based on the ranking list

contained in the June 16 Letter, Pono should have been awarded a license for the City and County of Honolulu.

The June 16 Letter also provided that Pono had 20 days from receipt of this notice in which to file a Notice of Appeal to the DOH. To date, Pono has not been provided with any information and/or explanations on the individual scores issued by each panel member, or the various merit criteria used to score each individual application. Because the criteria for scoring has been maintained by the DOH in secrecy (and continues to be maintained in secrecy), it is impossible to determine whether mistakes were made in compiling the scores from the various panel members or if there was any bias in favor of a successful applicant or against Pono. Indeed, Pono has received no explanation as to why its Application, which according the DOH “ranked 3rd for the county of Honolulu,” did not result in licensure for Pono.

(iv) Additional Problems With The Selection Process.

The licensing selection process was unnecessarily burdensome, arbitrary, and capricious. Admittedly, the Panel members, who were selected by the DOH, were certainly qualified in their respective fields. However, the Panel members had no experience or expert knowledge in venture capital, business plan review and analysis, or the medical cannabis industry. Moreover, the Panel members were only selected on March 21, 2016. Since the selection process was to be completed by April 15, 2016, the Panel members were placed in the impossible position of performing due diligence and evaluating 64 applications from March 21 until April 15. This impossible situation was compounded since, although five members were initially selected to serve on the Panel, on April 8, 2016, a mere one week before the successful applicants were to be announced, Dr. John Fisher was excused from the Panel, (presumably while applications were already being reviewed and scored by the other Panel members). To date, the reason for Dr.

Fisher's removal from the Panel has not been made public. The lack of information released to the public by the DOH, makes it impossible to determine whether Dr. Fisher's scoring, or lack thereof, or his actions or interactions with other members of the Panel prior to his removal damaged Pono. However, the removal of one of the members of the scoring panel so close to the completion date casts cloud of doubt on the entire outcome of that scoring. Pono and the public deserve to know the reason for Dr. Fisher's removal from the Panel and whether it had any effect on the outcome of the selection process. For example, at the time of Dr. Fisher's removal from the Panel, was Dr. Fisher already scoring the applications? Prior to this removal, did Dr. Fisher speak or correspond with other Panelists?

Moreover, the DOH never provided the public or the Applicants with an explanation as to why the DOH elected to proceed with the scoring of the applications with only the four remaining Panel members when the DOH had previously stressed to the Applicants that it was necessary for the scoring to be conducted by five Panel members. Indeed, the DOH had publicly stated as recently as March 21, 2016 that if a Panel member is "disqualified," it "will **necessitate** a new panel member being selected and delay the selection process." *See* March 21 DOH News Release announcing members of Selection Panel for Medical Marijuana Dispensary License (emphasis added).

Yet, inexplicably, when Dr. Fisher was removed from the Panel on April 8, the DOH did not select a new panel member. Instead, the DOH elected to proceed with only four Panel members scoring the applications. The DOH never provided the public or the Applicants any explanation as to why the DOH elected to proceed with scoring by only four Panel members following Dr. Fisher's removal in April. Given Dr. Fisher's removal on April 8, 2016, one week before the date for the public notification of the licenses, and presumably during the ongoing

scoring of the Application process, the DOH's decision to proceed with a Panel of four was arbitrary and capricious.

The license selection criteria were also arbitrarily weighted in a manner that did not promote the selection of the most qualified applicant. On the Application, thirteen (13) separate criteria were weighted evenly at ten points apiece, even though each of these criteria were afforded different page limits. In addition, depending on the criteria, applicants were awarded up to ten points for something as simple as stating they had not had a business license revoked. Such a simple criterion stands in stark contrast to an equally weighted question that concerns the individual applicant's business background and expertise. Indeed, that important question – Criterion 1 – was only worth ten points, but also contained 12 subsections. These subsections should have been critical to the selection process – an applicant's background in regulated industries, operating retail locations, and securing inventory and tracking systems are all vital determining factors in making a non-arbitrary selection for the licenses. However, these important traits to the successful operation of a business were relegated to sub-categories, and were therefore worth only .833 points each. This also assumes that each of those 12 sub-categories were equally weighted, which has also not been confirmed or denied at any point by the DOH. Applicants were given no direction as to what the Panel would consider the most important qualifying factors.

Moreover, to the best of Pono's knowledge, the Panel members were not given any uniform set of guidelines or instructions on how to grade applications or any other process for scoring on these various categories. With respect to scoring, each Panel member appears to have been left to their own devices. It is unclear if any Panel members were provided with background materials and understood the basic tenets of the medical cannabis business, which

would leave the door open for less qualified applicants to navigate their way through the selection process.

Further, the DOH failed to perform the necessary due diligence of Applicants to determine if the information submitted in the application was true and valid as mandated by the Legislature. In establishing Chapter 329D, the Legislature clearly intended that the DOH would vigorously review and verify the Applications. For example, HRS § 329D-4(l) provides that, “The department shall review and verify that the information submitted in the application is true and valid and meets the requirements established in section 329-3(b).” Nevertheless, after an initial review of the applicants to ensure that the applications were properly submitted, the only due diligence conducted by the DOH was the finger printing of all officers and employees. Admittedly, finger printing of employees could presumably lead to uncovering a criminal record of an officer or employee (which, given the industry, is very important). However, the DOH apparently neglected or chose not to conduct any other due diligence into the accuracy of the representations made by the applicants in their applications. Indeed, there was no due diligence conducted by the DOH and/or the Panel members to determine the veracity of responses to the queries contained in the Applications. Pono has been informed that since the April 29, 2016 announcement awarding licenses, certain successful applicants have been actively attempting to secure additional financing and a grow facility. Indeed, one successful applicant even said to Pono’s CEO that in filling out the application, “We were just trying to figure out how much we should lie.” Pono believes that certain licensees overstated their qualifications in their application and by accepting those applicants’ representations at “face value,” the DOH failed to uncover material misrepresentations contained in those applications. Pono’s Application was truthful and was supported by extensive documentary exhibits. Pono was prejudiced by the

failure of the DOH to conduct due diligence into the accuracy of the information contained in the applications.

Finally, Pono reserves the right to raise additional issues after it has had the opportunity to review any additional information or documents uncovered during the administrative appeal process. As explained previously, the Application review and selection process was opaque and the applicants, including Pono, were provided with little information from the DOH. If Pono's review of the documentary record during this appeal raises additional issues, Pono reserves the right to address those issues.

IV. RELIEF REQUESTED

FOR THE REASONS SET FORTH HEREIN, Appellant William Jarvis/Pono Organics Investors, LLC dba Pono Wellness respectfully requests that the DOH provide the following relief:

A. The DOH shall schedule a Hearing on this Appeal within fifteen days of the date of this notice or as soon thereafter that these issues may be heard.

B. If, in advance of or as result of the Hearing on the Appeal, the DOH determines that Pono's "application rank" was "3rd among applications submitted for the county of Honolulu," the DOH shall deem Pono a successful applicant and issue a Medical Marijuana License to Pono.

C. Alternatively, in advance of the Hearing on the Appeal, Pono shall be provided with all documents provided to Panel members used in the scoring of the Applications, all records of the due diligence conducted on each applicant, and all documents and information relating to the removal of John Fisher as a Panel member, and the decision by the DOH to proceed with the scoring of applications by only four Panel members.

D. If, in advance of or as a result of the Hearing on the Appeal, the DOH determines that the Pono licensing decision was made:

- (1) in violation of constitutional or statutory provision; or
- (2) in excess of statutory authority; or
- (3) upon unlawful procedure; or
- (4) affected by other error of law; or
- (5) clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record; or
- (6) arbitrary, or capricious, or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

Then the DOH should take immediate corrective action, including, but not limited to: (i) the issuance of a Medical Marijuana Dispensary License to Pono; or (ii) enjoin the current Medical Marijuana Dispensary Licensees from commencing operation until Pono has had the opportunity to commence its operation; or (iii) if warranted, enjoining the current Medical Marijuana Dispensary Licensees from commencing operation until the DOH can conduct further scoring of applicants through a panel of five members after such applicants have been fully verified by the DOH and vetted by the public; or (iv) any and all other corrective action that the DOH deems warranted.

E. If, in advance of or as a result of the Hearing, there is a finding that any Applicant was untruthful on its application, such Applicant should be barred from holding a Medical Marijuana Dispensary License or further consideration for an award of a Medical Marijuana Dispensary License.

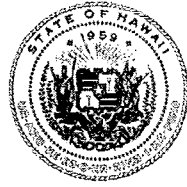
F. For such other and further relief as the DOH deems just and proper.

DATED: Honolulu, Hawaii, July 8, 2016.

A handwritten signature in black ink, appearing to read 'P. Brown', written over a horizontal line.

PHILIP R. BROWN
Attorney for Appellants
William Jarvis, Pono Organics Investors, LLC
dba Pono Wellness

DAVID Y. IGE
GOVERNOR OF HAWAII



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DEPARTMENT OF HEALTH
OFFICE OF HEALTH CARE ASSURANCE
601 KAMOKILA BOULEVARD, ROOM 337
KAPOLEI, HAWAII 96707

In reply, please refer to
file:

June 16, 2016

Mr. William Jarvis
Pono Organics Investors, LLC
dba Pono Wellness
1016 Koloa Street
Honolulu, Hawaii 96816

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7002 0510 0004 3292 3921

Dear Mr. Jarvis

**RE: NOTICE OF DENIAL FOR MEDICAL MARIJUANA DISPENSARY
LICENSE
APPLICATION NO: 3443
WILLIAM JARVIS / PONO ORGANICS INVESTORS, LLC DBA PONO WELLNESS**

Your application score: 455.00

X Your application rank: 3rd among applications submitted for
the county of Honolulu

 Your application was not verified as to meet the requirements of
section 329D-3(b), Hawaii Revised Statutes, (HRS) and thus was
not ranked for merit.

Your application for a license to operate a Medical Marijuana Dispensary was denied for
the following reason(s):

- (1) Failure to provide the information required in sections 11-850-13 through 11-850-17, Hawaii Administrative Rules (HAR);

- (2) Failure to meet the requirements set forth in chapter 11-850, HAR, Act 241, Session Laws of Hawaii 2015, or chapter 329D, Hawaii Revised Statutes (HRS);

EXHIBIT "1"

(3) Provision of misleading, incorrect, false, or fraudulent information;

(4) Failure to pay all applicable fees as required;

(5) Receipt of an application evaluation score lower than the successful applicants for the respective county;

(6) An applicant has a background history that indicates the applicant does not have a reputable and responsible character or would pose a risk to the health, safety, or welfare of the public or qualifying patients;

(7) Other ground that serves the purpose of 11-850 HAR or 329D, HRS:

You have a right to appeal the decision within 20 days of receipt of this notice pursuant to section 329D-21, HRS, and sections 11-850-24 and 11-850-101, HAR.

Notice of appeal shall be sent in writing, mailed by U.S. Postal Service or hand-delivered to the Department of Health, Office of Health Care Assurance, 601 Kamokila Blvd., Room 337, Kapolei, Hawaii 96707. Electronically mailed requests for an appeal will NOT be accepted.

Pursuant to section 11-850-101(e), HAR, if you request an appeal, your request will be posted on the Department of Health website, and a successful applicant for this license may intervene as of right in any hearing.

Sincerely,

Margaret Leong

Margaret Leong
Supervisor
Medical Marijuana Dispensary Licensing Program

