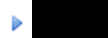




## Medical Marijuana Dispensary License Application

Department of Health, Office of Health Care Assurance

[Home \(/mmjdisp/index.html\)](#) [My Account](#) [Log Out \(/mmjdisp/logout\)](#)



Criteria 1. Ability to operate a business, including but not limited to education, knowledge, and experience

Criteria 2. Plan for operating a medical marijuana dispensary in the county for which the applicant is seeking a license, including but not limited to a timeline for opening a retail dispensing location

Criteria 3. Proof of financial stability and access to financial resources

Criteria 4. Ability to comply with the security requirements of this chapter and section 329D-7, HRS

Criteria 5. Capacity to meet the needs of qualifying patients

Criteria 6. Ability to comply with criminal background check requirements pursuant to this chapter and sections 329D-7, 329D-12, and 846-2.7, HRS

Criteria 7. Ability to comply with the requirements in this chapter and chapters 329 and 329D, HRS, for inventory tracking, security, and dispensing limits for qualifying patients

Criteria 8. Ability to maintain confidentiality of a qualifying patient's medical condition, health status, and purchases of marijuana or manufactured marijuana products

Criteria 9. Ability to conduct or contract for certified laboratory testing on marijuana and manufactured marijuana products pursuant to this chapter and sections 329D-7 and 329D-8, HRS

Criteria 10. Ability to comply with requirements for packaging, labeling, and chain of custody of products

Criteria 11. A plan for secure disposal of marijuana and manufactured marijuana products

Criteria 12. Ability to ensure product safety, in accordance with this chapter and sections 329D-8, 329D-10, 329D-11, HRS

Criteria 13. No history of having a business license revoked.

Total Merit Criteria Points Awarded to Applicant

**HELPFUL INFORMATION FOR FILLING OUT THIS FORM:**

1. You can save your work on this form by checking the 'Save my progress and resume later' box and then clicking the 'Save form and resume later' button at the bottom of each screen.  
**IMPORTANT:** Remember to do this every time you leave your application or you will lose the information you have entered.

2. To keep your information secure, remember to log out of your application each time you finish working on it.




3. Use a current version of Google Chrome or Firefox browser when completing this form.

4. Save the form every 20 minutes to avoid timing out. When entering information in a spreadsheet, save and exit the form first.

5. Do not include single or double quote marks ( ' or " ) or more than one period ( . ) in your document names.

**INSTRUCTIONS FOR THE MEDICAL MARIJUANA DISPENSARY LICENSE APPLICATION**

Before applying for a medical marijuana dispensary license, applicants must acknowledge that they have read the statute and administrative rules on medical marijuana dispensary licensing. Click be redirected to the statute and administrative rules.

Hawaii Revised Statute (HRS) 329D	 I acknowledge that I have read <a href="http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/9329D-HRS.pdf">Chapter 329D, HRS (http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/9329D-HRS.pdf)</a> , and I am aware of the application and licensing requirements.
Hawaii Administrative Rules (HAR) Chapter 11-850	 I acknowledge that I have read <a href="http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/93/files/2015/12/Dispensary-Rules-Chapter-11-850-signed-by-Gov-12-13-15.pdf">HAR, Chapter 11-850 (http://health.hawaii.gov/medicalmarijuana/wp-content/blogs.dir/93/files/2015/12/Dispensary-Rules-Chapter-11-850-signed-by-Gov-12-13-15.pdf)</a> , and I am aware of the licensing requirements.
Disclaimer:	 I understand that the use and possession of marijuana is illegal under federal law, and is illegal under State law except as provided in Chapters 329 and 329D, HRS.

**MINIMUM REQUIREMENTS**

All individual applicants and applying entities must meet the requirements listed below or the application will not be accepted. Applicants must attach proof to the online application as described in sections.

**INDIVIDUAL APPLICANT**

- \* Individual applicant shall be at least 21 years old.
- \* Shall be a legal resident of the State of Hawaii for at least five (5) uninterrupted years immediately preceding the date of the license application.
- \* Shall not have any felony convictions or any other disqualifying background history.
- \* Shall be authorized by the applying entity to submit an application for a dispensary license, and act as the primary point of contact with the department.

**APPLYING ENTITY**

- \* The applying entity must be organized under the laws of the State of Hawaii.
- \* Have a Hawaii tax identification number.
- \* Have a Department of Commerce and Consumer Affairs Business Registration Division number and suffix.
- \* Have a federal employer identification number.
- \* Not be less than fifty-one percent held by Hawaii legal residents or entities wholly controlled by Hawaii legal residents who have been legal residents for not less than five years immediately prece application was submitted.
- \* Have financial resources under its control of not less than \$1,000,000 for each license applied for, plus not less than \$100,000 for each retail dispensing location allowed under the license applied bank statements or escrow accounts, and those financial resources shall have been under the control of the applying entity for not less than ninety days immediately preceding the date the applica
- \* Be composed of owners, principals, or members, each of whom is not less than twenty-one years of age and has no felony convictions or any other disqualifying background history.

**APPLICATION FEE**

The license application fee of \$5,000 by certified check or cashier's check payable to the State of Hawaii, Department of Health, is part of the minimum requirements and must be received at Depart Medical Marijuana Dispensary Licensing, Room 337, 601 Kamokila Blvd., Kapolei, HI 96707 or be postmarked by 4:30 pm Hawaii Standard Time on the last day of the open application period Januar

Please note the application number on the check. This is found in the heading of the email confirmation you receive upon submittal, and is also visible when you view your completed application on

---

**NOTE: ALL QUESTIONS MUST BE ANSWERED TO SUBMIT YOUR APPLICATION UNLESS OTHERWISE INDICATED.**

**SECTION A: APPLICATION FOR COUNTY**

**NOTE:** An applicant may apply for a license for more than one county, but may only receive one license. Indicating here that you are applying for a license for more than one county does not consti license in another county; separate applications must be submitted. The applicant and applying entity must complete a separate application with all required documentation for each application an refundable application fee of \$5,000 for each application. The financial resources required (\$1,000,000 plus not less than \$100,000 for each retail dispensing location) may apply across applications only apply toward one license, if granted.

---

1. For which county are you requesting a license? City & County of Honolulu

---

2. Are you also applying for a dispensary license in another county? ☐

---

2a. If YES, what other county or counties are you applying for a license?  
(NOTE: A separate application and check will be required for each county.)

---

## SECTION B: INDIVIDUAL APPLICANT INFORMATION

## GENERAL INFORMATION

3. Legal Name of Applicant

Jason Kalani Bullard

4. Upload Proof of Legal Name of Applicant

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certified copy of the Certificate of Naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Court-issued, certified copy of a divorce decree;
- \* Certified copy of a legal change of name order

5. Date of Birth (must be at least 21 years old)

**Scan and submit a certified copy of AT LEAST ONE (1) of the following:**

\* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;

\_\_\_\_\_

\* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;

\* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;

\* Valid, unexpired driver's license or government issued photo identification card.

1

United States

114

██████████

████████████████████

**12. Has the individual applicant ever been convicted of a felony? If YES, STOP, you are not an eligible applicant.**



**14. Has the individual applicant ever been arrested?**



14a. If YES, please describe (e.g., date, disposition, etc.)

---

**Obtain a Criminal History Report**

Copy the Validation code from an eCrim report for the individual applicant generated by the Hawaii Criminal Justice Data Center no earlier than December 12, 2015 at 8:00 a.m. (Hawaii-Aleutian Standard Time). [REDACTED]

Visit [eCrim.ehawaii.gov \(https://ecrim.ehawaii.gov/ahewa/\)](https://ecrim.ehawaii.gov/ahewa/) to obtain the eCrim report.

15. Enter the eCrim Validation Code here:

16. NOTICE: Pursuant to Chapter 329D HRS and Chapter 11-850 HAR, applicants are required to provide consent to a background check, including fingerprinting, to be conducted by the Department of Health or its designee.

☒ I consent

Further information and instructions will be provided on <http://health.hawaii.gov/medicalmarijuana/>. If the information and instructions are not yet posted, please check the website often.

RESIDENCY INFORMATION 17. Is the Applicant a legal resident of the State of Hawaii for at least five years? If NO, STOP, you are not an eligible applicant. [REDACTED]

18. Upload Proof of Hawaii Residency:

Scan and submit AT LEAST ONE (1) of the following source documents as proof of Hawaii state residency for at least five years:

- \* State of Hawaii tax return Form N-11 without schedules, worksheets, or attachments, and redacted to remove all financial information and all but the last four digits of the individual's social security number;
- \* Evidence of voter registration;
- \* Ownership, lease, or rental documents for place of primary domicile;
- \* Billing statements including utility bills; or
- \* Vehicle registration.

0 [REDACTED]  
[REDACTED]

19. Authorized to Act on Behalf of Applying Entity

Scan and submit evidence of the authority of the individual to act on behalf of the applying entity, and supporting documentation (e.g. corporate resolution, bylaws, articles of incorporation):

0 [REDACTED]  
[REDACTED]

---

**SECTION C: APPLYING ENTITY INFORMATION**

20. Name of Applying Entity

Green Leaf Group, LLC d/b/a Hawaiian GreenLeaf Company, LLC

21. Applying Entity's Business Address

290 Karsten Drive  
Wahiawa, Hawaii 96786  
United States

22. Entity Phone #

[REDACTED]

23. Entity Email

[REDACTED]

24. Entity Fax #

[REDACTED]

---

25. Is the applying entity organized under the laws of the State of Hawaii?  
If the answer is 'NO', STOP, you are not an eligible applicant.

Yes

26. Upload Applying Entity Incorporation or Business Status  
Documentation:

Upload a certified copy of applying entity's incorporation documents in  
the State of Hawaii.



Visit [Hawaii Business Express](https://hbe.ehawaii.gov/documents/search.html)  
(<https://hbe.ehawaii.gov/documents/search.html>) for available  
documents.

27. Provide the entity's Hawaii Department of Commerce & Consumer  
Affairs Business Registration Division Number & Suffix (file number).

Visit [Hawaii Business Express - Business Name Search](https://hbe.ehawaii.gov/documents/search.html)  
(<https://hbe.ehawaii.gov/documents/search.html>) to locate your entity's  
file number.

28. Upload a copy of the entity's Certificate of Good Standing from the  
Department of Commerce and Consumer Affairs.



29. Hawaii Tax Identification Number:

Provide the number along with a copy of the State of Hawaii Tax  
Identification Number (see question immediately below).

Visit [Tax ID Search](https://dotax.ehawaii.gov/tls/app) (<https://dotax.ehawaii.gov/tls/app>) for this  
information.

30. Upload a copy of the entity's State of Hawaii Tax Identification  
document.



31. Federal Employer Identification Number: Provide the Federal Employer  
Identification Number.

32. Upload a copy of the entity's Federal Employer Identification Number  
document.



#### OWNER(S), PRINCIPAL(S), & MEMBER(S) INFORMATION

33. Enter the total number of Owner(s), Principal(s), and Member(s) of the  
applying entity here:

---

**34. Upload Owner, Principal, and Member Information Spreadsheet**

**INSTRUCTIONS:** Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Information to be provided:

**1) List of Owners, Principals, and Members of the Applying Entity**

For each Owner, Principal, and Member of the Applying Entity:

- A) Name, Address, Phone number, and Email Address
- B) Each individual's percent interest in the company
- C) State of primary residence
- D) Number of years each person has lived in Hawaii (the most recent, uninterrupted number of years that the person has been a resident), and
- E) A criminal background check for each Owner, Principal, and Member.

Copy the validation code from an eCrim report for the individual generated by the Hawaii Criminal Justice Data Center no earlier than December 12, 2015 at 8:00 a.m. (Hawaii-Aleutian Standard Time).

Visit [eCrim.ehawaii.gov \(https://ecrim.ehawaii.gov/ahewa/\)](https://ecrim.ehawaii.gov/ahewa/) to obtain the eCrim report.

Please include a signed statement by each Owner, Principal, or Member certifying that the information is complete and accurate. Upload the signed statements in the following question (35.)

**2) Other Businesses Holding an Interest**

If there are businesses that hold an interest in the company, list the business names and percent interest on a separate tab on the spreadsheet.

[Download Owner Principal Member Information Spreadsheet \(/mmjdisp/templates/Owner\\_Principal\\_Member\\_Report.xls\)](#)

---



35. Upload Proof of Name, Date of Birth, and Residency for each Officer, Principal, or Member listed on the spreadsheet

1) Proof of Legal Name of Each Owner, Principal, and Member:

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certificate of naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Court-issued, certified copy of a divorce decree;
- \* Certified copy of a legal change of name order;

2) Proof of Date of Birth

Scan and submit a certified copy of AT LEAST ONE (1) of the following:

- \* Certified copy of a birth certificate or marriage certificate filed with a state office of vital statistics or equivalent agency in the individual's state of birth or marriage;
- \* Valid, unexpired U.S. passport [inside cover and first page only] or U.S. passport card;
- \* Consular report of birth abroad Form FS-240, DS-1350 or FS-545 issued by the U.S. Department of State;
- \* Valid, unexpired permanent resident card (Form I-551) issued by the Department of Homeland Security (DHS) or the U.S. Citizenship and Immigration Services (USCIS);
- \* Unexpired employment authorization document issued by the DHS, Form I-766 or Form I-688B;
- \* Unexpired foreign passport with the following: a valid, unexpired U.S. visa affixed, and an approved I-94 form documenting the applicant's most recent admittance into the United States or a DHS admittance stamp on the passport;
- \* Certificate of naturalization issued by DHS, Form N-550 or Form N-570;
- \* Certificate of citizenship, Form N-560 or Form N-561, issued by DHS;
- \* Valid, unexpired driver's license or government issued photo identification card.

**3) Proof of Hawaii Residency:**

Scan and submit **AT LEAST ONE (1)** of the following source documents as proof of Hawaii state residency for at least five years:

- \* State of Hawaii tax return Form N-11 without schedules, worksheets, or attachments, and redacted to remove all financial information and all but the last four digits of the individual's social security number;
- \* Evidence of voter registration;
- \* Ownership, lease, or rental documents for place of primary domicile;
- \* Billing statements including utility bills; or
- \* Vehicle registration.

Document size limit is 2 MB. Up to 10 documents may be attached.

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**SECTION D: FINANCIAL INFORMATION**

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**36. FINANCIAL RESOURCES GENERAL INFORMATION**

**INSTRUCTIONS:** Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Information to be provided:

1) Financial Resources the applying entity has under its control. List each financial resource, amount of the resource (round to nearest dollar, no cents), and verifying information (account type, account number, account name, name of financial institution, applicant contact information) as shown on the spreadsheet



2) Date Resource/Dollar amount under the applying entity's control

[Download Financial Resources General Information Spreadsheet \(/mmjdisp/templates/Financial\\_Resources\\_General.xls\)](#)

Upload the completed Financial Resources General Information Spreadsheet

---

**37. Upload Financial Resources General Information Supporting Source Documents**

Upload supporting source documents, i.e. bank statements, escrow account information, balance sheets etc. Supporting source documents for Financial Resources General Information must be provided as proof of the financial resources.



Document size limit is 10 MB. Up to 5 documents may be attached.

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**38. FINANCIAL RESOURCES -  
RETAIL DISPENSING LOCATION INFORMATION**

**INSTRUCTIONS:** Download the EXCEL spreadsheet below, enter the following information in the format required, and upload it to attach it to your application.

Data to be provided:

1) Financial Resources the applying entity has under its control for each retail dispensing location allowed (2 locations maximum)

2) Dollar Amount (total aggregate for each retail dispensing location shall be not less than \$100,000, or \$200,000 for 2 locations)

3) Date Resource/Dollar amount under the applying entity's control (resources have been under the Applying Entity's control for not less than 90 days)

[Download Financial Resources - Retail Dispensing Location Information Spreadsheet \(/mmjdisp/templates/Financial\\_Resources\\_Retail\\_Dispensing\\_Location.xls\)](#)

Upload the completed Financial Resources - Retail Dispensing Location Information Spreadsheet

---

**39. Upload Retail Dispensary Location Supporting Source Documents**

Upload supporting source documents, i.e. bank statements, escrow account information, balance sheets etc. Supporting source documents for retail dispensary locations must be provided as proof of the financial resources.

Document size limit is 10 MB. Up to 5 documents may be attached.

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**SECTION E: MERIT INFORMATION - OPTIONAL**

Responses for each criteria shall be no longer than specified for each criteria, double spaced, font size no smaller than 12, and margins no less than 1 inch on all sides.

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(1) Ability to operate a business, including but not limited to education, knowledge, and experience with:

- (A) Regulated industries;
- (B) Agriculture or horticulture;
- (C) Commercial manufacturing;
- (D) Pharmaceutical companies;
- (E) Operating or working in a medical marijuana dispensary business;
- (F) Creating and implementing a business plan, including a timeline for

opening a business;

- (G) Creating and implementing a financial plan;

- (H) Retail sales;

- (I) Secure inventory tracking and control;

- (J) Protecting confidential customer information;

(K) Owning or managing a business that required twenty four hour security monitoring; and

- (L) Any other experience the applicant considers relevant;

Response to (1) shall be no longer than five (5) pages.

Upload Response to (1)

---

(2) Plan for operating a medical marijuana dispensary in the county for which the applicant is seeking a license, including but not limited to a timeline for opening a retail dispensing location;

Response to (2) shall be no longer than five (5) pages.

Upload Response to (2)

---

(3) Proof of financial stability and access to financial resources, including but not limited to:

(A) Legal sources of finances immediately available to begin operating a dispensary;

(B) A summary of financial statements in businesses previously or currently owned or operated by the applicant;

(C) A financial plan for operating a medical marijuana dispensary in Hawaii;

(D) Good credit history; and

(E) History of bankruptcy by the applicant or entities owned or operated by the applicant;

Response to (3) shall be no longer than five (5) pages.

Upload Response to (3)

---

(4) Ability to comply with the security requirements of Chapter 11-850 and Section 329D-7, HRS;

Response to (4) shall be no longer than five (5) pages.

Upload Response to (4)

---

---

(5) Capacity to meet the needs of qualifying patients, including but not limited to:

(A) Educating patients on how marijuana can be used to assist patients with debilitating medical conditions and about the marijuana and manufactured marijuana products that will be available in the applicant's retail dispensing locations;

(B) Producing and maintaining a supply of marijuana that is sufficient to meet the needs of qualifying patients;

(C) Providing safe, accessible retail dispensing locations; and

(D) Measuring and improving customer satisfaction;

Response to (5) shall be no longer than five (5) pages.

Upload Response to (5)

---

(6) Ability to comply with criminal background check requirements pursuant to Chapter 11-850 and Sections 329D-7, 329D-12, and 846-2.7, HRS;

Response to (6) shall be no longer than three (3) pages.

Upload Response to (6)

---

(7) Ability to comply with the requirements in Chapter 11-850 and Sections 329 and 329D, HRS, for inventory tracking, security, and dispensing limits for qualifying patients;

Response to (7) shall be no longer than five (5) pages.

Upload Response to (7)

---

(8) Ability to maintain confidentiality of a qualifying patient's medical condition, health status, and purchases of marijuana or manufactured marijuana products;

Response to (8) shall be no longer than three (3) pages.

Upload Response to (8)

---

(9) Ability to conduct or contract for certified laboratory testing on marijuana and manufactured marijuana products pursuant to Chapter 11-850 and Sections 329D-7 and 329D-8, HRS;

Response to (9) shall be no longer than three (3) pages.

Upload Response to (9)

---

(10) Ability to comply with requirements for packaging, labeling, and chain of custody of products;

Response to (10) shall be no longer than three (3) pages.

Upload Response to (10)

---

---

(11) A plan for secure disposal of marijuana and manufactured marijuana products;

Response to (11) shall be no longer than five (5) pages.

Upload Response to (11)

---

(12) Ability to ensure product safety, in accordance with Chapter 11-850 and Sections 329D-8, 329D-10, 329D-11, HRS.

Response to (12) shall be no longer than five (5) pages.

Upload Response to (12)

---

(13) No history of having a business license revoked.


Response to (13) shall be no longer than three (3) pages.

Upload Response to (13)

---

**SECTION F: CERTIFICATION AND SUBMITTAL**

**Certification**

 I hereby certify under penalty of law that the information submitted as part of this application is correct and complete.

By checking the box above and entering the individual applicant's name below, the applicant has electronically signed this application.

**Applicant Name**

Jason Kalani Bullard

If you have previously submitted an application and this is a revision, enter the unique entry number(s) of your previous submission(s) here.

**User ID**

**User Email**

Entry Info

**Date Created**

**Date Updated**

**IP Address**

FILED 06/23/2015 06:21 PM  
Business Registration Division  
DEPT. OF COMMERCE AND  
CONSUMER AFFAIRS  
State of Hawaii



STATE OF HAWAII  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
Business Registration Division  
335 Merchant Street  
Mailing Address: P.O. Box 40, Honolulu, Hawaii 96810  
Phone No. (808) 586-2727



**ARTICLES OF ORGANIZATION FOR LIMITED LIABILITY COMPANY**  
(Section 428-203 Hawaii Revised Statutes)

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK

The undersigned, for the purpose of forming a limited liability company under the laws of the State of Hawaii, do hereby make and execute these Articles of Organization:

I

The name of the company shall be:  
**GREEN LEAF GROUP LLC**

(The name must contain the words *Limited Liability Company* or the abbreviation *L.L.C. or LLC*)

II

The mailing address of the initial principal office is:  
**290 KARSTEN DRIVE, WAHIAWA, HI 96786 USA**

III

The company shall have and continuously maintain in the State of Hawaii a registered agent who shall have a business address in this State. The agent may be an individual who resides in this State, a domestic entity or a foreign entity authorized to transact business in this State.

- a. The name (and state or country of incorporation, formation or organization, if applicable) of the company's registered agent in the State of Hawaii is:

**KALANI BULLARD**

(Name of Registered Agent)

(State or Country)

- b. The street address of the place of business of the person in State of Hawaii to which service of process and other notice and documents being served on or sent to the entity represented by it may be delivered to is:

**290 KARSTEN DRIVE, WAHIAWA, HI 96786 USA**

IV

The name and address of each organizer is:

**KALANI BULLARD**

**290 KARSTEN DRIVE, WAHIAWA, HI 96786 USA**

I HEREBY CERTIFY that this is a true and correct copy of the official record(s) of the Business Registration Division.



DIRECTOR OF COMMERCE  
AND CONSUMER AFFAIRS

January 21, 2016

V

The period of duration is (check one):



At-will



For a specified term to expire on: \_\_\_\_\_

(Month Day Year)

VI

The company is (check one):

a.

Manager-managed, and the names and addresses of the initial managers are listed in paragraph "c",  
and the number of initial members are:

b.



Member-managed, and the names and addresses of the initial members are listed in paragraph "c".

c.

List the names and addresses of the initial managers if the company is Manager-managed, or  
List the names and addresses of the initial members if the company is Member-managed.

KALANI BULLARD

290 KARSTEN DRIVE, WAHIAWA, HI 96786 USA

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
\_\_\_\_\_

VII

The members of the company (check one):



Shall not be liable for the debts, obligations and liabilities of the company.



Shall be liable for all debts, obligations and liabilities of the company.

Shall be liable for all or specified debts, obligations and liabilities of the company **as stated below**, and have consented in writing to the  
adoption of this provision or to be bound by this provision.\_\_\_\_\_  
\_\_\_\_\_We certify, under the penalties set forth in the Hawaii Uniform Limited Liability Company Act, that we have read the above statements, I am authorized to  
sign this Articles of Organization, and that the above statements are true and correct to the best of our knowledge and belief.

23

JUNE 2015

Signed this

\_\_\_\_\_ day of \_\_\_\_\_

KALANI BULLARD

(Type/Print Name of Organizer)

KALANI BULLARD

(Signature of Organizer)

(Type/Print Name of Organizer)

(Signature of Organizer)

06/23/201557315



[illegible]

List the business name(s) and percent interest on the spreadsheet if there are businesses that hold an interest in the applying entity.

Other Businesses Holding an Interest	Percent Interest
Kanaka Partners, LLC	49%
Medcap, LLC	10%

\*NOTE, Gregory F. Daniel, MD is the sole owner and member of Kanaka Partners, LLC.

Joe Leoni, Jr. is the sole owner and member of Medcap, LLC.

Their information is included on the preceding sheet and their ownership percentages are listed in accordance with the ownership percentages of their respective entities, since they are the sole owner of those entities.



Green Leaf Group, LLC  
d/b/a Hawaiian GreenLeaf Company, LLC  
290 Karsten Drive  
Wahiawa, Hawaii 96786  
(808) 864-3583

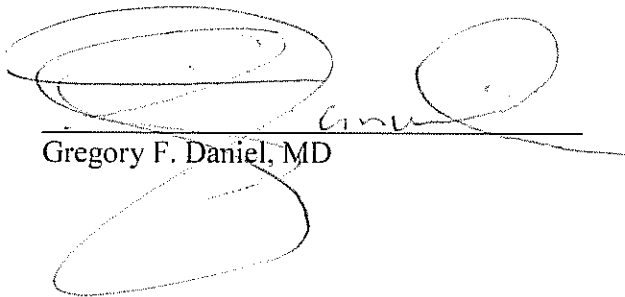
---

**Affirmation of Gregory F. Daniel, MD**

I, Gregory F. Daniel, MD affirm:

1. That I am an Owner of Green Leaf Group, LLC d/b/a Hawaiian GreenLeaf Company, LLC; and
2. That the information about me contained in the Excel spreadsheet titled "Owner/Principal/Member Report", the required attachment for Question #34, is complete and accurate.

**I affirm that the above and foregoing representations are true and correct to the best of my information, knowledge and belief.**



Gregory F. Daniel, MD

1/22/16  
Date



Green Leaf Group, LLC  
d/b/a Hawaiian GreenLeaf Company, LLC  
290 Karsten Drive  
Wahiawa, Hawaii 96786  
(808) 864-3583

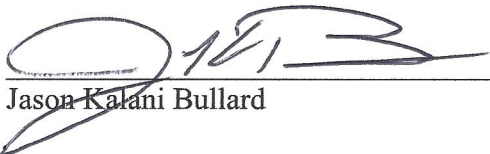
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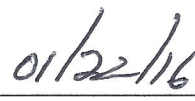
**Affirmation of Jason Kalani Bullard**

I, Jason Kalani Bullard, affirm:

1. That I am an Owner of Green Leaf Group, LLC d/b/a Hawaiian GreenLeaf Company, LLC; and
2. That the information about me contained in the Excel spreadsheet titled "Owner/Principal/Member Report", the required attachment for Question #34, is complete and accurate.

**I affirm that the above and foregoing representations are true and correct to the best of my information, knowledge and belief.**

  
Jason Kalani Bullard

  
Date



Green Leaf Group, LLC  
d/b/a Hawaiian GreenLeaf Company, LLC  
290 Karsten Drive  
Wahiawa, Hawaii 96786  
(808) 864-3583

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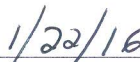
**Affirmation of Joe Leoni**

I, Joe Leoni, affirm:

1. That I am an Owner of Green Leaf Group, LLC d/b/a Hawaiian GreenLeaf Company, LLC; and
2. That the information about me contained in the Excel spreadsheet titled "Owner/Principal/Member Report", the required attachment for Question #34, is complete and accurate.

**I affirm that the above and foregoing representations are true and correct to the best of my information, knowledge and belief.**

  
Joe Leoni

  
Date



Green Leaf Group, LLC  
d/b/a Hawaiian GreenLeaf Company, LLC  
290 Karsten Drive  
Wahiawa, Hawaii 96786  
(808) 864-3583

---

### **Affirmation of Michael Church**

I, Michael Church, affirm:

1. That I am an Owner of Green Leaf Group, LLC d/b/a Hawaiian GreenLeaf Company, LLC; and
2. That the information about me contained in the Excel spreadsheet titled "Owner/Principal/Member Report", the required attachment for Question #34, is complete and accurate.

**I affirm that the above and foregoing representations are true and correct to the best of my information, knowledge and belief.**

Michael Church

1-22-16  
Date

## **Green Leaf Group LLC.**

### **Merit Question 1**

#### **I. Overview**

Employing a vast array of scientific evidence, Green Leaf Group is advancing Medical Cannabis to the next level. We have assembled a team of experts dedicated to using modern techniques to provide a safe and science based approach to Medical Cannabis. Our revolutionary cultivation and leading-edge extraction and processing technology along with novel medical products ensures that our patients will receive superior products, care and services. Green Leaf Group has developed partnerships with Monarch America, an industry leader in pharmaceutical-grade cannabis cultivation and ProVerde Laboratories, an ISO certified scientific medical lab focused on cannabis processing, product development and testing; all with a combined goal of transforming the Cannabis Pharmaceuticals industry within the Hawaii marketplace. The executive management team at Green Leaf Group is comprised of nationally recognized leaders in medicine, business, regulatory compliance, finance and horticulture.

#### **Experienced and Knowledgeable Executive Team**

As healthcare operators we have successfully developed transformative programs which have revolutionized patient care in multiple markets. Our collective successful management of over 40 healthcare entities is indicative of our organization's ability to exceed compliance standards within a tightly regulated environment.

**Gregory Daniel, MD, MBA**, Green Leaf Group's CEO, has over 15 years of experience as an entrepreneur building startup healthcare companies into successful multi-million dollar enterprises. In 2000, Dr. Daniel founded The Exigence Group, a healthcare services enterprise with over 250 practitioners serving multiple service lines including: Emergency Medicine,

Urgent Care, Hospitalist Medicine, Occupational Medicine, Primary Care and specialist practices. At its pinnacle the Organization saw 750,000 patients annually. In addition to establishing a national brand, the Immediate Care locations were recognized as the first Urgent Care Organization in the Eastern United States to achieve accreditation under the rigorous Joint Commission Accreditation program.

**Joe Leoni**, Executive Vice President of Development, is a founding member of Green Leaf Group. Mr. Leone has established himself as a successful real estate developer and influential business owner in Hawaii. Mr. Leoni, a Hawaii resident since 1983, supervised the redevelopment of the plantation town of Koloa, Kauai. Mr. Leoni went on to develop multiple projects in Hawaii with an aggregate value of over [REDACTED]. His most notable projects include the King Kamehameha Marriott Kona Beach Hotel on Big Island, the Bayview Golf Course in Honolulu and the Kekaulike Market located in the Chinatown region of Honolulu. Mr. Leoni's proven business acumen and Hawaiian real estate experience makes him an invaluable asset to our organization.

**Jason “Kalani” Bullard** serves as the company's Chief Operating Officer and brings his experience as a successful dispensary owner to the organization. Mr. Bullard was the founder and owner of one of the first 5 dispensaries licensed in the Colorado and one of the largest and fastest-growing medical marijuana dispensaries in Denver, Colorado. Mr. Bullard is well known as a successful businessman and pioneer in the medical marijuana industry and has an extensive experience in both production and retail operation of medical marijuana.

**Matt Cook**, Owner of Governmental Compliance, has over 30 years of regulatory enforcement experience. Mr. Cook has developed an unparalleled security plan for our production and dispensary sites. His served as Sr. Dir. for CO's Medical Marijuana Enforcement



Division, directing security and preventive measures. He also served 12 years with the Colorado Liquor Enforcement where he managed a \$4.5 million budget and became V.P. of the National Conference of State Liquor Administrators. Mr. Cook recently served as Sr. Dir. of Enforcement at the CO Dep't of Revenue where he was responsible for the oversight of several divisions and developed the medical marijuana regulatory schema for Colorado that is still utilized.

#### **A. Regulatory Industry Experience**

**ProVerde Laboratories**, our laboratory partner and one of the world's leading ISO-17025 accredited medical marijuana processing and testing laboratories, will operate our first-rate processing and testing facility on-site. The executive team at ProVerde, drafted medical marijuana processing regulations for several newly legalized States. ProVerde provides our organization with concrete data from medical marijuana analytics to ensure the production of safe and effective evidence-based products.

#### **B. Agriculture and Horticulture Experience**

**Monarch America, Inc.** (“Monarch”), our cultivation partner, has over 75 years of combined industry experience in cultivation facility wholesale and retail operations. A publicly-traded corporation, Monarch has a proven track record in the marijuana industry and has assisted with the development of over 25 commercial marijuana production facilities across 10 states and in Canada. Partnering with Monarch's knowledgeable team brings a wealth of experience to our operations.

Overseeing Monarch's operations at our facility, our organization has engaged one of the nation's leading horticultural scientists as our Director of Cultivation, **Dr. Harry Arikaki**. Dr Arikaki has had an esteemed career as a horticultural botanist at the University of Hawaii. Dr

Arikaki's expertise will ensure the production of quality harvests optimized for medicinal use. Through his leadership, our organization will employ techniques to reduce power consumption and diminish the ecological impact of a large-scale medical marijuana cultivation facility.

### **C. Medical Marijuana Operations Experience**

**Avis Bulbulyan**, CEO of our cannabis industry consulting firm is heavily involved in the national cannabis industry. Mr. Bulbulyan was one of the early entrants into the cannabis industry dating back to 2006. He is a regular speaker at Native Nation events and National industry conferences, speaking on topics ranging from licensing to operational best practices.

### **D. Additional Relevant Business Experience**

**Michael Church**, Executive Security Director, will oversee our security program and infrastructure. Mr. Church has 25 years of experience in the security industry and is a retired Honolulu Police Detective Sergeant and a past investigator for the State of Hawaii.

**Louis Fisher**, R.Ph., our Chief Substance Control Director, has decades of experience in diversion prevention. He served 28 years with the Drug Enforcement Agency. His experience with the DEA includes roles as Diversion Program Manager of the New England Field Division.

**Anderson Hee**, Security Director, is a former supervisory agent for the Department of the Attorney General, State of Hawaii. Mr. Hee has over 30 years of law enforcement experience and 11 years of security experience. He is a retired Honolulu Police Department Lieutenant.

**Robin K. Medeiros**, Security Director, is the President of Star Protection Agency LLC and has 25 years of experience in the security industry. He is a former Honolulu Metropolitan Police Officer and has worked as a US Navy instructor in counterintelligence and security.

**Maggie Kuchy**, our Chief Information Officer, has over 25 years of experience developing advanced information systems and infrastructure to assist healthcare providers in streamlining

and integrating services in areas of technology, compliance, patient care, policy and security. She brings years of broad-based experience in building organizations, leading Six Sigma innovation teams, launching new technologies, and supporting rapid growth. Ms. Kuchy served as Chief Information Officer for one of the largest healthcare services systems in the country, where she successfully created business models for delivering new services and leading technology-driven strategic initiatives such as telemedicine and online programs to increase patient interaction and care integration.

**Andrea A. Tarshus**, Esq., General Counsel, has years of experience in the heavily regulated healthcare industry. Ms. Tarshus has been responsible for achieving and preserving Joint Commission accreditation at the national urgent care facilities. She was also responsible for designing and implementing the division's regulatory-related and compliance programs related to HIPAA, OSHA, state and federal laws and other accrediting body regulations.

**Ali Sorbi** our CFO, has SEC forecasting and projection experience derived from his tenure at Geeknet as Vice President of FP&A and CFO. He has created financial models built to specifications required by the SEC. Green Leaf Group will adhere to a similar financial controls and reporting structure, as a Pharmacy operating under the Federal Food, Drug, and Cosmetic Act of 1938.

## **II. Proven Business Success**

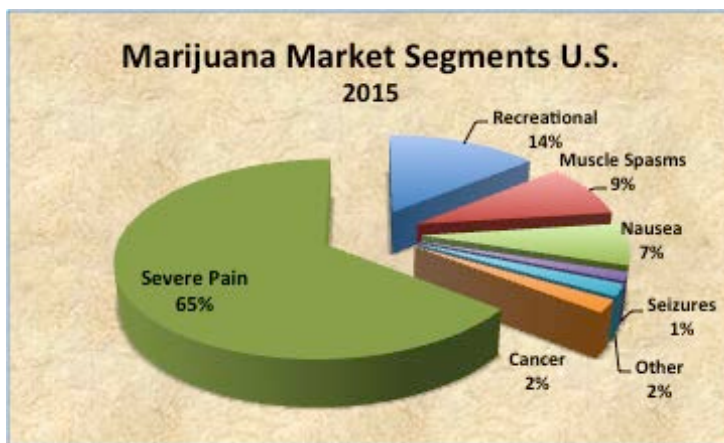
Our experienced executive team has a proven track record of creating thriving enterprises from startups. Our members are disciplined in the implementation of effective strategies, including adhering to project timelines, creating and executing operational plans resulting in a unique ability to deliver on commitments and achieve successful business results.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #2**

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Medical Dispensary Plan:

Green Leaf Group LLC is a limited liability company formed in Hawaii in April 2015 with the intention of operating a medical marijuana dispensary at [REDACTED]. Our timeline corresponds with the Hawaii, DOH timeline for issuing licenses. Recognizing an



announcement date around April 15,

2016, [REDACTED]  
[REDACTED]  
[REDACTED]

by November of 2016.

The dispensary will provide the

community with pharmaceutical grade medical marijuana for qualifying patients, who have been diagnosed with debilitating conditions such as cancer, glaucoma, HIV/AIDS, wasting syndrome, chronic pain, nausea, seizures, multiple sclerosis, and crohn's disease, epilepsy, diabetes and now PTSD.

Green Leaf Group LLC will set the industry's gold standard by providing safe access, high-quality pharmaceutical marijuana in partnership with a nationally recognized processing partner, proVerde Labs, along with delivering knowledgeable customer service to all of our patients.

Our innovative science and technology focused approach along with our in-depth understanding of the chemistry behind cannabinoids and terpenes will allow Green Leaf Group LLC and

ProVerde Laboratories to develop leading edge formulations and deliver them using novel approaches.

The dispensary Manager, Shane Ginoza, also a pioneer involved in the early stages of the MMJ Industry in Colorado, has successfully managed Hawaiian Herbal Health Center with responsibilities for the daily operations and daily compliance of the rules and regulations by the Marijuana Enforcement Division.

Abundant anecdotal evidence and limited medical research suggest that Medical Marijuana can dramatically improve the quality of life for people suffering from chronic HIV-related pain, cancer-related nausea, and epilepsy, among other conditions. MMJ dispensaries that can provide high quality, appropriately dosed medicine to patients will significantly improve treatment options for residents of the Great State of Hawaii.

#### Standard Operating Procedures

Our organization has established a complete set of Standard Operating Procedures (SOPs) that will guide all aspects of operations within our retail dispensary including: the receipt, storage, packaging, labeling, handling tracking, and dispensing of products containing medical marijuana and medical marijuana waste. These manuals contain policies relative to human resources management, operational efficiencies, safety, and internal/external audit procedures necessary to achieve established benchmarks and maintain compliance with the Hawaii state regulations while effectively managing business operations at the facility.

The Chief Compliance Officer (CCO) will implement the Dispensary related operational SOPs manuals, in collaboration with the Dispensary Manager.

## Personnel

In addition to the executive administration, the retail dispensary and grow facility staff will include a retail Dispensary manager, three bud tenders, two reception/office staff, four security staff (two at the retail location and two at the grow facility), an assistant grower, three grow technicians, and two general maintenance staff.

## Employee Training

Our Executive Staff along with the Chief Compliance Officer will be responsible for the development and administration of our training programs as well as ongoing education programs. These programs will train and educate all employees regarding all aspects of Federal and State medical marijuana laws and regulations, the science and medicinal uses of medical marijuana, and ensure competency in their job functions.

Prior to working for our organization, each member of the dispensary and grow facility staff will be required to complete an intensive 35 hour long educational training course. The week long course will be administered under the oversight and direction of the Chief Compliance Officer. The training will be comprised of informational PowerPoint presentations and multi-media materials, staff demonstrations and company forms and manuals. At the end of each section of the training course, a short quiz will be administered to verify competency in the material covered. Each staff member must successfully complete the training course and each associated quiz prior to beginning work. After the successful completion of the initial training course, the newly hired staff member will enter into a ninety (90) day probationary period of employment with continual monitoring and evaluation.

The Chief Compliance Officer will develop posted signs with information regarding compliance standards associated with particular job duties. This will serve as a continuous reminder regarding important information that need to be adhered to.

Each employee will be required to demonstrate competency, proficiency and professionalism in their roles in order to begin and subsequently maintain their positions within the Organization.

### Marketing, Promotion & Public Relations

The foundation of our marketing strategy revolves around the development of resilient ties between our organization the community, and Local physicians. As such, we will develop a robust community outreach element in order to educate and instruct everyone as to the appropriate uses and benefits of medical marijuana.

Our outreach methods will include:

Patient and physician education programs, a robust and informative website, a public relations strategy, online marketing initiatives, printed brochures, monthly newsletters, direct mail campaigns, patient loyalty programs, event sponsorship opportunities and; participation in trade shows.

In addition, we will utilize our recognized healthcare background to develop Continued Medical Education (“CME”) courses and other clinical education materials relevant to the medical marijuana industry to procure productive relationships with Hawaiian physicians and healthcare workers. As a physician led organization, we will position ourselves as an informational resource for Hawaiian physicians and healthcare workers participating in a recently implemented medical marijuana program.

Our organization has developed both printed and electronic materials that describe the varieties of medical marijuana, and product formulations available in our dispensary. This product manual will list each available strain or formulation, the THC to CBD ratio of that particular strain or product and describe its anticipated effects as well as dosing recommendations. Electronic versions of this manual will be emailed to registered patients as part of a monthly newsletter and will also be available on our website. Dispensary staff will be educated in understanding and articulating the benefits of each marijuana strain to inquiring patients who present on site.

### Pricing

Based upon our past industry experience as dispensary operators in the state of Colorado and market estimates, we expect the product to be priced around [REDACTED]. Keeping the needs of patients in mind, our organization will make every effort to maintain affordable pricing without compromising quality and customer service.



**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #3**

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**(A) Legal sources of finances immediately available to begin operating a dispensary.**

➤ **See Appendix A:**

1)

[REDACTED]

**(B) A summary of financial statements in businesses previously or currently owned or operated by the applicant.**

➤ **See Appendix B:** Financial summaries for businesses operated by the Owners.

1) Jason Kalani Bullard, COO; and

2) Gregory F. Daniel, MD, CEO (sole owner and member of Kanaka Partners, LLC, 49% owner of the applicant)

**(C) A financial plan for operating a medical marijuana dispensary in Hawaii.**

➤ **See Appendix C:** Financial Plan.

**(D) Good credit history.**

➤ **See Appendix D:** Letter from Citizens Bank confirming good credit history for Gregory F. Daniel, MD. Gregory F. Daniel, MD is the sole owner and member of Kanaka Partners, LLC, 49% owner of the applicant.

**(E) History of bankruptcy by the applicant or entities owned or operated by the applicant.**  
None.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #3**

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**APPENDIX A**

- 1) [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]



























































**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #5**

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**(A) Overview:** We are focused on providing patients with relevant information surrounding the use of appropriately dosed product formulations used to treat the approved debilitating medical conditions. Our comprehensive patient education program encompasses:

- I. Published Educational Materials:** Our Organizational printed and electronic patient education materials and programs include an Overview of Medical Marijuana and the Endo-Cannabinoid System where Patients are educated as to the following:
  - a. The body's endocannabinoid system, an internal homeostatic regulatory system that influences multiple physiological processes, including the modulation of pain, seizure threshold, appetite, digestion, mood and other processes.
  - b. Its three main components are endocannabinoids, receptors and regulatory enzymes.
  - c. By modulating this system using Phytocannabinoids we alleviate ailments;
- II. Material Availability:** Our Educational materials will be available upon registration, during one-on-one patient counseling, in the lobby waiting area, the dispensary area where marijuana is displayed, and on our website. Patients will have the option of subscribing to our monthly newsletter. We will routinely host patient education programs including seminars with reputable industry guest speakers and clinical experts.
- III. Appropriate use of Medical Marijuana to Treat Ailments:** Patients will be taught that effects of cannabis consumption are multifactorial and include:
  - a. The dose of cannabis consumed

- b. The ratio of the various cannabinoids in the cannabis product
- c. The route of administration
- d. The timing – the effects of cannabis are different right after consumption as compared to hours after consumption
- e. The health and age status of the patient
- f. The co-administration of other drugs/medicines
- g. Whether or not the patient has been using cannabis recreationally (or receiving cannabis therapy) long-term or if the patient is cannabis naïve

**IV. Our Specific Formulations and Products material:** Our material will describe in detail the available types of medical marijuana and product formulations we offer including a description of each strain, its anticipated effects as well as dosing recommendations and indications of the THC to CBD ratio for each particular strain or product.

**V. Disease- and Medical Condition-Specific Information:** We will also provide informational material from the WHO, CDC, Hawaii State Department of Health and other healthcare organizations for qualifying medical conditions; contact information and resources for local support groups and information centers.

**VI. Knowledgeable Staff:** Through focused training courses, we will equip our Registered Dispensary Agents (RDAs) with the information necessary to educate patients on safe and effective treatment methods. As part of our customer satisfaction outreach, patients will receive follow-up calls to see if they have any questions about the methods of use or any other treatment related issues.

**(B) Maintaining marijuana supply sufficient to meet the needs of qualifying patients**

Green Leaf Group will cultivate 100% of the marijuana that will be sold in the retail dispensary. The cultivation site is 4 miles from the first planned retail dispensary site and 30 miles from the second planned retail dispensary site. Our space analysis will allow us to grow the maximum of 3000 plants in 36,000 SF of space. Through the use of Good Agricultural Practices and precise environmental controls, we expect to optimize production to a quarter pound of useable marijuana per plant. Our cultivation center will utilize a perpetual harvest technique that will yield an approximately 187 pound harvest monthly after the first four months of operations. The ability to meet projected demand will be a major focal point of our cultivation operations. One of the biggest threats to a cultivator in the medical marijuana industry is crop loss. A loss of a crop can cost an organization millions of dollars and can significantly disrupt patient access. We will utilize an advanced environmental controls to help eradicate potential contamination threats and significantly reduce the risk of crop loss. Our controlled environment technology allows us to control humidity levels to prevent the onset of powdery mildew, mold and rotting, due to the encapsulated nature of our growing chambers. Naturally, in the last few weeks of its life, the marijuana plant begins to deteriorate from the inside of the stem so that eventually the buds that bear reproductive seeds will fall to the ground and grow new plants. Our cutting-edge humidity controls will extract humidity from the greenhouse at an expedited rate during the last few weeks of a harvest to control this effect and prevent mold formation and eventual decay.

**(C) Safe, accessible retail dispensing location.**

The Dispensary is [REDACTED] an easily accessible main road.

The facility is one level with no ramps, and has 8 designated patient parking stalls. It is

approximately [REDACTED] The entire facility  
will be secured with perimeter lighting during hours of darkness. The main entrance to the  
Dispensary [REDACTED]

[REDACTED]  
[REDACTED] Loitering on  
or near the premises is strictly prohibited.

[REDACTED]

- I [REDACTED]  
[REDACTED]  
[REDACTED]
- I [REDACTED]
- I [REDACTED]
- I [REDACTED]  
[REDACTED]
- I [REDACTED]  
[REDACTED]
- I [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



[REDACTED]

**(D) Patient Satisfaction Programs.**

Our executive team members have extensive experience with establishing successful programs in healthcare facilities to ensure high levels of patient satisfaction. Every patient will be allowed to provide feedback via a survey during the visit which they are encouraged to complete as they progress through the patient encounter.

**Community Service:** If granted a license, it is the intent of our Organization to use this process to benefit the many homeless children and drug addicted parents on these islands. Kalani Bullard and Dr. Greg Daniel have pledged to develop a children's ministry to provide a safe Haven for homeless children and work with drug addicted parents to recognize the benefits of a drug free existence and a meaningful life.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #6**

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**I. Overview**

Green Leaf Group will comply with the criminal background check requirements as set forth by the Hawaii regulations. These requirements will be included in our company standard operating procedures. [REDACTED]

**II. Practice**

Green Leaf's standard operating procedures (SOPs) surrounding its policies on criminal background checks will be included in its Operating Manual. All employees will be trained on this manual prior to beginning work within the organization. Employees must sign an Acknowledgement Form stating that they have read and understand the contents of this manual. Failure to abide by the SOPs contained in the manual will be grounds for disciplinary action, up to and including termination.

**III. Procedure**

All applicants, licensees, employees, subcontractors and their employees, and prospective employees ("Relevant Person") must undergo a criminal background check, in compliance with Hawaii regulations. These background checks may either be conducted by the Hawaii Department of Health or its designee. Criminal background checks shall include criminal history checks.

Before allowing a person affiliation with the Company, either in an employment or membership capacity, the Company shall provide the Relevant Person with a Background Check

Consent Authorization Form. This form will also include spaces for the [REDACTED] [REDACTED] to fill in demographics information required by the Federal Bureau of Investigation to conduct the test, including, but not limited to, name, date of birth, height, weight, eye color, hair color, gender, race, and place of birth. The bottom of the form will include an attestation by the [REDACTED] as to whether he/she has ever been convicted of a crime.

The authorization formm must be signed and dated and returned to the Company. Green Leaf will then process the background check, in accordance with the regulations and procedures set forth by the State of Hawaii. Once a [REDACTED] report has been received, the Relevant Person will be permitted to enter into an affiliation with Green Leaf, pursuant to the relevant Security protocols set forth by Green Leaf in our Security Standard Operating Procedures.

#### **IV. Additional Screening Practices**

Green Leaf Group will implement a strict and detailed method of Human Resource hiring practices which includes thorough screening of all potential employees.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Once employed, all personnel will be required to attend company information and training seminars. Department managers will lead and instruct new staff members on all aspects of their job requirements. Security personnel will be a part of this process. New employees will be required to sign off on appropriate policies. Security staff will walk staff members through the facilities and provide physical training on the security systems. All new employees will be aware of the 24/7 surveillance coverage that is occurring within the facility and outside. They will be educated on the need to use biometric access to transverse through the facility and that they are only authorized to access doorways that lead them to their work areas. Employees will be advised that random physical checks and searches of their lockers or vehicles will occur in order to maintain congruity and that no cellular phones will be allowed past certain access points. New employees will always be instructed to remain vigilant, to know what is going on around them and to watch others in order to minimize or eliminate all potential threats of theft or diversion.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## **Green Leaf Group LLC.**

### **Merit Question 7**

#### **I. Overview**

The Green Leaf Group has partnered with BioTrackTHC (“BioTrack”), the State’s selected inventory control vendor, to provide our facilities with a cutting edge technology solution that includes inventory tracking management, enterprise resource planning, point-of-sale, financial reporting and regulatory compliance. Our Chief Information Officer will ensure that our technology seamlessly provides for thorough information tracking and management to ensure the uninterrupted flow and security of information. In addition, our Chief Compliance Officer will update our company’s standard operating procedures as needed, to ensure that we follow the State’s regulations in regards to patient dispensing limits and the recording and tracking of patient information.

#### **II. Inventory Tracking**

The BioTrack software solution is specifically designed for total overall inventory control. Green Leaf is the only organization in Hawaii who has been certified by BioTrack. The system will interface with the department's computer software tracking system to allow the department real time, twenty-four hour access to the Green Leaf Group’s tracking system and inventory records.

BioTrack enables us to collect, store, and retrieve all data and activity with respect to inventory records, quality assurance/laboratory testing, supplier records, patient records, client-records, employee records, recall reports, quarantine and waste reporting, sales/transaction records, disposal records, and all scanned documents at any time, in real time. The system is able to record transfers of small amounts of marijuana product to a laboratory for testing. Input may

include fields including, but not limited to: date of transfer, transferred by, order number, source license number, laboratory name, laboratory license number, and list of transferred products including product ID, product name, lot and/or batch number, and quantity. BioTrack creates a 16 digit non-repeatable identifier for each plant. This identifier is printed onto a barcode that is affixed to the plant and will remain associated with this given plant throughout its lifecycle. We can trace the lineage of any product all the way back to the plant from which it derived. Any action performed by an employee is stored within the system indefinitely and is searchable. This real-time tracking of each gram or milligram of raw marijuana; every milliliter of extraction; and every finished food item, ensures inventory control.

The BioTrack system automates the retail dispensary record keeping process by easily allowing for tracing back products for the purpose of recall, tracking the disposal of products that are outdated, damaged, deteriorated or misbranded, ensuring first-in-first-out inventory control, providing business reporting and tracking qualified patient records, including purchase history.

All authentication is encrypted via industry standard SSL and hardware is managed and maintained internally. As with any system involving patient data, security is a top priority. The BioTrack system utilizes the latest Secure Socket Layer (SSL) encryption technology to ensure a secure operating experience. All technology supporting remote access to the system is fully secure and founded on current industry standards of strong authentication, encryption and HIPAA Compliance. The connection state is always encrypted end-to-end from browser to web server using Secure Socket Layer (SSL). Database connections are also encrypted via standard authentication + SSL. At no point in the network path will data be unencrypted. In the event of a loss of internet access, BioTrack has the ability to operate in Offline mode.

[illegible]



#### **IV. Dispensing Protocol and Patient Limits**

Green Leaf Group will implement and continually evaluate and change, as necessary, our SOPs to ensure we maintain the highest operational and compliance standards established by the State of Hawaii for dispensing medical marijuana. We will focus on effectively training an employee from day one throughout their entire tenure within our organization on our standard SOPs, including our protocols for dispensing and regulations surrounding patient limits. Our dispensary will maintain the highest level of standards that our patients deserve and the State of Hawaii requires for dispensing medical marijuana.

All staff will be trained on our patient dispensing protocols contained in our Standard Operating Procedures (SOPs) Manual. Staff receive thorough training during our intensive 35-hour training program and must read and understand all SOPs before beginning work with the organization. To document this training and understanding, staff must sign an acknowledgement form stating that they have read and understand the SOPs.

In addition, BioTrack has a “Sales Limits” function that we will use to regulate the permissible quantities allotted to a patient or caregiver. The system stores patient purchases and cross-references with the State of Hawaii defined limits. The system can also issue stop purchase



alerts if a patient attempts to exceed said defined limits and disallow the completion of such a sale. The limits will be set within the system such that sales to qualifying patient or primary caregiver shall not exceed four ounces of marijuana during a period of fifteen consecutive days and shall not exceed eight ounces of marijuana during a period of thirty consecutive days.

## V. Security

A series of horizontal black bars of varying lengths, representing redacted text. The bars are arranged in a list-like fashion, with some bars being longer than others, suggesting different levels of redaction or different types of information being withheld. The bars are solid black and have no text or other markings on them.

**GREEN LEAF ~~COMPANY~~GROUP, LLC**  
**MERIT SECTION QUESTION #8**

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**I. Overview**

Green Leaf Group is a physician-led team of problem solvers and innovators who are experienced with creating safe, comfortable and compliant healthcare environments. Our distinguished medical marijuana dispensary will be designed to provide the highest levels of quality patient care through clinical efficiencies and superior customer service and an attention to patient privacy. Green Leaf intends to manage our dispensary with the same quality standards and meticulous confidentiality as a traditional medical facility or pharmacy. Our executive team has a combined 75 years of healthcare industry experience with a vast knowledge of medical facility daily operations, patient privacy and HIPAA standards.

**II. HIPAA Compliant Protocols**

**A. HIPAA Manual**

Our HIPAA Manual houses all of our policies and procedures surrounding patient privacy and the handling, storage and destruction of sensitive and confidential information. Modeled after the requirements under The Health Insurance Portability and Accountability Act of 1996, this manual includes policies on accessing confidential information, disclosing confidential information, handling requests for confidential information, data back-up procedures, sharing information with the Hawaii Department of Health, an overview of the Security Rule, and other HIPAA-related policies.

**B. HIPAA Training**

Prior to beginning operations with our organization, each registered dispensary agent (RDA) will be required to complete an intensive 35 hour long educational training course. The course will

be administered over the course of a week under the oversight and direction of the Director of Education and Clinical Affairs. The course will include comprehensive training on our thorough HIPAA Manual. In addition to training on this manual, employees will be trained on handling confidential information such as formulas, audits, reports, and personnel files and the procedures for securing and destroying confidential material. Employees must sign Acknowledgement Forms stating that they have read and understand all of the materials they have been trained on.

### **III. Private Patient Experience**

Our dispensary's service area will be designed with privacy in mind. The dispensary's countertop area where patients will interact with Registered Dispensary Agents (RDAs) will be segregated by partitions so that patients can consult with dispensary agents and complete their medical marijuana transaction in privacy. In addition, the dispensary facility will offer a separate patient education and consultation area where patients or caregivers can privately consult with dispensary agents. The enclosed patient education area will be accessible from the waiting area as well as the dispensary area.

### **IV. Patient Privacy Policy**

To ensure that patients are aware of our organization's policies on the protection of their confidential information, each patient will receive a copy of our "Notice of Privacy Practices" form at registration. This document details the legal obligations of our company to maintain the privacy of protected health information (PHI), gives the patient notice of our legal duties and privacy practices, informs the patient about how their PHI can be used and disclosed, informs the patient about his/her rights to access their PHI and modify our usage of their PHI, and informs the patient of our obligation to follow the terms of the Notice. A "Receipt of Privacy

Policy/Authorization of Use” form will be completed and signed by each patient. This form will be stored in the patient’s electronic records.

#### **V. Secure Electronic Patient Records System**

All patient records and information, including a qualifying patient's medical condition, health status, and purchase history of marijuana or manufactured marijuana products will be stored in our secure electronic tracking system, BioTrack THC. This secure system allows us to securely access, transmit and store sensitive patient information, including demographics, protected health information (PHI) and other confidential information. Only authorized staff will be able to access patient information within this database. Each authorized staff member will have a unique username and password and their access to patient records will be tracked. No patient records or confidential information will be disclosed without express authorization to do so, either by the patient, or due to a legal requirement compelling such disclosure.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #9**

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**I. Overview**

All medical marijuana will be tested through our on-site ISO-certified laboratory and by a State-approved independent testing laboratory to ensure compliance with standards set forth by the State of Hawaii. ProVerde Laboratories (“ProVerde”), our exclusive processing partner, is one of the world's leading medical marijuana processing and testing laboratories and will operate our state-of-the-art processing and testing facility on-site utilizing an array of scientifically proven testing methodologies.

**II. ProVerde Laboratories**

As the co-founder and Chief Scientific Officer of ProVerde, Dr. Christopher Hudalla is a Ph.D. analytical chemist with more than 25 years of research experience in analytical chemistry and chromatographic method development. His significant experience in the extraction, testing and purification of cannabinoids ensures that the pharmaceutical-grade products we produce are consistent and safe for patient consumption.

**III. Employee Qualifications and Training**

The expertise of the employees performing testing operations is essential for success. Required experience levels will vary depending on the individual’s role. A senior level chemist with a minimum of a Ph. D. in chemistry or pharmaceutical sciences will be responsible for day-to-day operations, including analytical testing and batch formulation. Additional staff will be required to hold at least a Bachelor’s Degree and have experience related to pharmaceutical manufacturing or preparation of marijuana-based products. A regimented training program, governed by GMP guidelines, will ensure the production of high quality, consistent products. As

part of the Quality Management System, all training activities will be thoroughly documented to ensure that each employee performing each activity is trained appropriately.

#### **IV. In-House Testing Methodologies**

ProVerde will use an array of testing methodologies to analyze medical marijuana samples for consistency and quality control. The following testing methods will be employed:

**A. Liquid Chromatography (LC):** Analysis for the profile and potency of cannabinoids will be performed using the Ultra Performance Liquid Chromatography System (UPLC). This technology represents one of the fastest, most reliable and robust technologies available for analytical testing. At the same time, this technology provides a dramatic reduction in the use of organic solvents, relative to conventional High Pressure Liquid Chromatography (HPLC), minimizing the amount of hazardous waste generated, making it one of the most environmentally friendly testing methodologies available.

**B. Head-Space Gas Chromatography (HS-GC):** Analysis of residual solvents (also referred to as Volatile Organic Compounds or VOCs) as well as the volatile terpene components of the marijuana plant will be achieved using Gas Chromatography, with Head-Space gas sampling. This technique heats the sample in a sealed vial such that all of the volatile components are vaporized into the vial headspace, above the sample, from which the sample is drawn for analysis. This results in the analysis of only the volatile components being injected on to the system, minimizing the effects due to other complex matrix components.

**C. Most Probably Number Enumeration (MPN):** Screening for microbiological contaminants is performed via a cultured enrichment, followed by enumeration using optical laser readings to measure biological load. Microbiological screening includes total aerobic count (AC), total coliform (CC), total enterobacteriaceae (EB), and total yeast and mold (YM).

**D. ImmunoAffinity Assay (IA)** – Mycotoxins are the toxic byproduct of certain molds.

Products will be screened for these potential contaminants using a variety of techniques, including the ImmunoAffinity based assays.

**V. Controls and Testing Of Microbiological Contamination**

A Hazard Analysis Critical Control Point (HACCP) Management system will address product safety through the analysis and control of biological, chemical and physical hazards from raw material production, procurement and handling, to manufacturing and distribution of the finished product. All extraction and processing will be performed in a sterile facility designed with commercial kitchen functionality. Procedures will be implemented to ensure routine cleaning and disinfection of all equipment and environments. Analytical testing will be used routinely to assess the production environment, with sampling and testing of production equipment and surfaces for microbiological contamination. Marijuana starting materials and final products will be tested for microbiological contamination through internal testing with confirmation for final products through an independent certified testing laboratory.

**E. Sampling and Testing Of Final Products**

Final products will be tested by an external State-approved independent certified laboratory to confirm cannabinoid and terpene profiles and potency (for dosing), and to confirm products are free from contamination from pesticides, plant growth regulators, heavy metals, VOCs, and microbiological contaminants. For oral dosed and vaporizer products, including tablets, capsules, and dissolving strips, multiple units will be tested from a single batch to confirm cannabinoid dosing and product homogeneity.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #10**

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**I. Packaging Design**

All packages will be opaque. Where the product container is opaque, the label may be applied directly to the container. All containers will be sealed with a tamper evident seal to show if the container has been opened between the finished processing and packaging and final sale to the patient. Green Leaf Group's Dispensary SOPs require that all packaging of medical marijuana products be child-resistant. Multi-dose pill, capsule or tablet-style products will be packaged in child-resistant containers. Additionally, where appropriate, the medicine will be packaged in dose appropriate packaging for accuracy in dosing.

**II. Label Design**

As per our master design specification, all marijuana product infused product labels will be printed with a specific location where a personalized label can be affixed. This will include the patient's name, date of transaction, and content of the package along with any specific dosing as may be applicable, along with label warnings and other items as discussed above. Labels will be printed in English and have a font size of at least one-sixteenth of an inch high. Where the packaging may be too small to meet the amount of labeling at the appropriate size, a prescription style folding label may be utilized.

**III. Label Contents**

All products will include on its label the total quantity of medical marijuana product in the package. Where the medicine is in a pill, capsule, tablet or similar form, the label will indicate cannabinoid levels in each unit. A single container will not contain more than the legal amount of medical marijuana product allowed by Hawaii State law. Labels will indicate the cannabinoid



concentration per dosed amount, i.e. 1 or 2 tablets, 100mg, 10 ml, etc., as well as the equivalent physical weight of the marijuana. A listing of ingredients that comprise greater than 1% will be listed in order of volume. Trace amounts of less than 1% will not be individually listed. Labels will include basic directions for use of the product. These may include dose instructions such as amounts, what time of day to use the medicine, frequency of dosing and ingestion pathway, orally, topically mucosal or vaporization. Special storage requirements or warnings will be on the label as necessary.

#### **IV. Label Warnings**

Green Leaf Group's State-approved seed-to-sale software, BioTrackTHC ("BioTrack") is configured to print the following warnings and guidelines on each label:

- **“WARNING:** (1) the contents of this package may be lawfully consumed only by the qualifying patient named on the attached label.”
- **“WARNING:** (2) it is illegal for any person to possess or consume the contents of the package other than the qualifying patient.”
- **“WARNING:** (3) it is illegal to transfer the package or contents to any person other than for a caregiver to transfer it to a qualifying patient.”
- **“WARNING: KEEP THIS PACKAGE, ITS CONTENTS AND ALL MEDICINE AWAY FROM CHILDREN”**
- "This product may be unlawful outside of the State of Hawaii and is unlawful to possess or use under federal law"
- "This product has intoxicating effects and may be habit forming
- "There may be health risks associated with consumption of this product"

- "This product is not recommended for use by women who are pregnant or breast feeding"

## **V. Label Verifications**

A verification of any label claims, including cannabinoid and terpene concentrations, will be done through testing done by an approved ISO 17025 Accredited Laboratory or similar accreditation licensed by the State of Hawaii. After verifying the applicable cannabinoid and terpene profiles, those results will be approved for product labeling. All reported values will be appropriate to the dose and formulation of the product. A verification process, developed through our quality control, is performed to ensure the Certificate of Analysis identification matches the production lot before cannabinoid concentrations are labeled. BioTrack automatically syncs testing data upon receipt from a certified testing location. Testing will ensure the product is free of contaminants with consistent THC and/or CBD levels. BioTrack syncs testing data to the applicable plant batch and barcode. This information is directly ported onto the associated product labels.

## **VI. Chain of Custody**

Upon receipt of a marijuana product delivery, dispensary receiving agents in the receiving area will physically inspect every product and confirm that each and every product is in a secured and undamaged condition. The receiving agent will physically verify that each package's label matches the electronic manifest. Packages matching exactly will continue through the process to become part of the dispensary's inventory. For those packages whose labels don't match the electronic manifest, the receiving agent will pull the package and follow our standard operating procedures and protocols for packaging discrepancies. The tracking of all products from seed to sale, including transportation and chain of custody logs, will be entered into BioTrack.

**HAWAIIAN GREENLEAF COMPANY, LLC**  
**MERIT SECTION QUESTION #11**

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**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #11**

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**I. Overview**

Green Leaf Group will remove, quarantine, and dispose of waste in accordance with the regulations set forth by the Hawaii Department of Health. We will properly remove and dispose of medical marijuana and medical marijuana products waste in a secure manner which prevents unauthorized use. This disposal will be documented. All staff will receive exhaustive training on the company's standard operating procedures dealing with the proper handling and disposal of medical marijuana waste prior to beginning work within the organization. These SOPs will be updated as needed to maintain compliance with the Hawaii DOH regulations.

**II. Discarding Medical Marijuana Plant Waste**

**A. At the Cultivation Facility**

- a) Storage of medical marijuana containing material mixed 1:1 with used media occurs in limited access areas or securely locked dumpster.
- b) Medical marijuana plant waste is only discarded in separate waste bins that only contain non-plant material items. The bins for marijuana waste are green in coloration and the non-plant material bins are gray. Signage is used to designate all waste bins. Signs stating "Plant Material Only" labels the bins containing only marijuana waste by-products and a sign stating "All Other Waste" labels the bins containing non-plant material.
- c) Dumpsters and waste bins meet all state and local laws and are kept locked.
- d) Only cultivation and manufacturing facility staff have access to marijuana waste bins. Waste and waste bins are stored out of the public view.

**HAWAIIAN GREENLEAF COMPANY, LLC**  
**MERIT SECTION QUESTION #11**

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- e) The keys to locked areas are only provided to necessary cultivation and manufacturing facility staff and waste management staff member.
- f) All staff members with keyed access are on a list manifest.
- g) At limited access entries and exits in areas containing marijuana waste, video surveillance is present.
- h) At the end of each day, all waste is bagged in approved collection bags and labeled with the date and batch number. Waste is then moved from the production area to the safe or vault by authorized personnel. No waste materials are to be kept in the production rooms overnight.
- i) The waste is weighed and recorded on the “Waste Log” for the appropriate Batch.

**B. At the Dispensary**

- a) Staff will log all information from the returned or unusable medical marijuana product into the inventory tracking system, and if applicable, the Returned Product Log.
- b) After returned/unusable items are logged, they will be placed in a secured waste bin labeled as product to be destroyed.
- c) Disposal documentation will include: product description, quantity, date, time, location, reason for disposal, lot number and tracking ID, quantity and net weight of product, manner of disposal, and names and signatures of both company employees authorized to conduct destruction of the product.
- d) Returned/unusable products will be disposed of in a manner which prevents unauthorized use and such disposal will be documented.

- e) On Waste Logs, records of weights of the amount of the product, type of product and date are recorded.
- f) We will use highly secured vehicles, with bonded drivers, to pick up and deliver these approved waste shipments to the licensed grower for disposal.
- g) Drivers will be required to electronically validate that the shipment matches the manifest, prior to leaving, to ensure correct chain of custody protocol.

### **III. Destruction of Waste**

We will separate for storage, in a quarantined area, marijuana that is outdated, damaged, deteriorated, misbranded or adulterated, or whose containers or packaging have been opened or breached, until that marijuana is destroyed, in accordance with the following guidelines:

- a) Processing waste occurs the day of a harvest event. All contaminated, damaged or excess plants and products are disposed at this time. This allows for the media used during cultivation to be mixed with marijuana-containing waste. This renders the product unusable and unrecognizable.
- b) Marijuana waste will be stored, secured, locked and managed in accordance with DOH regulations.
- c) All waste in marijuana-containing and non-marijuana-containing waste is to be weighed.
- d) On waste logs, records of weights of the amount of raw material, type of raw material and date are kept.
- e) All weighed waste is chipped and/or grinded down and mixed at 1:1 rate with used media.
- f) Copied waste logs are provided to waste management services.

**HAWAIIAN GREENLEAF COMPANY, LLC**  
**MERIT SECTION QUESTION #11**

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- g) The waste stored in the waste bins designated for foliage and stems of a caliper less than 1/8" is to be rendered useless and unidentifiable. The waste in these specific bins are to be emptied into the mowing box.
- h) In the mowing box, the foliage and small stems are to be mulched, mowed and bagged until it is well ground.
- i) After well ground, the material must be mixed with media at a 1:1 ratio if present with trash.
- j) Waste stored in the bins that are identified as stems larger in caliper than 1/8" must be cut into segments noticeably shorter than 12".
- k) We accept unused, excess, or contaminated marijuana products from the dispensary through approved waste shipments, and will destroy and maintain a written record of the transaction in accordance with these waste disposal policies and procedures.
- l) We will create and maintain detailed records of all destroyed products in the BioTrack THC system. Disposal documentation will include product description, quantity, date, time, location, reason for disposal, lot number and tracking ID, quantity and net weight of product, manner of disposal, and names and signatures of both company employees authorized to conduct destruction of the product.
- m) At all times, any disposal or destruction of product will require "two person control," meaning that any employee destroying or disposing of the product will require supervision from an authorized manager to document the process.
- n) Only authorized employees have the access levels in the BioTrackTHC inventory tracking system and within our secured facilities to destroy medical marijuana.

- o) All waste and unusable product will be weighed, recorded and entered into our inventory tracking system prior to mixing and disposal. Verification shall be performed by a supervisor and conducted in an area with video surveillance.
- p) All nutrient enriched grow media will be disposed of as required by the Environmental Protection Act and the associated rules.
- q) All disposed waste containing medical marijuana material or byproducts must rendered useless and unrecognizable.

#### **IV. Security Measures**

All waste will be stored, secured, and managed in accordance with applicable state and local statutes, ordinances and regulations. We will store damaged, unusable medical marijuana products inside locked, odor-limiting receptacles within a limited access area equipped with electronic locks and video surveillance. All entry/exit to limited access areas will be tracked and monitored using an advanced access control system.

#### **V. Waste Disposal Records**

When excess plants and damaged plants are to be discarded, the unique tracking tag (RFID) with plant identifier, date and cultivar name is to be filed. A folder is kept for all discarded plant filings. The BioTrackTHC inventory system will be updated immediately. Until waste processing finishes, the plant waste is discard in a medical marijuana waste bin and the media is held. Next, all posted cultivation and dispensary manifests or inventories are updated.

When medical marijuana or MIPs are disposed of, our managers will confirm in the end of day report that any disposed product is properly documented and recorded in BioTrackTHC inventory system. Disposal records will kept for at least five (5) years.

**GREEN LEAF GROUP, LLC**  
**MERIT SECTION QUESTION #12**

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**I. Overview**

Green Leaf Group is focused on providing patients safe, consistent, pharmaceutical-grade products. Our on-site ISO-certified laboratory, stringent quality assurance procedures and thorough sanitization measures ensure that each product that enters the marketplace is safe for patient consumption.

**II. Quality Assurance**

Our Director of Education and Clinical Affairs will administer annual training for all staff on our SOPs as well as the Hawaii regulations. By following our comprehensive Quality Assurance SOPs at every stage of production, we ensure that products are not distributed unless they meet rigorous standards and regulations. Each plant and product is tracked through BioTrack via its assigned unique 16 digit barcode which integrates with our seed-to-sale tracking software, allowing continuous monitoring of production logs, including testing results. This oversight ensures compliance with all Green Leaf Group standards at every step of the plant's life cycle through to processing. Our ability to administer testing of end products and formulations within our sophisticated ISO certified on-site laboratory will ensure that effective controls are in place to closely monitor and detect any deviations from our SOPs and the standards set forth by the State. Any corrective actions required will be implemented before products are released for distribution. No products will be released unless they meet our stringent quality control requirements.

**III. Laboratory Testing**

**A. On-Site ISO-Certified Laboratory**



All medical marijuana will be tested through our ISO-certified on-site laboratory as well as an approved independent testing laboratory to ensure compliance with standards set forth by the State of Hawaii. We have partnered with a nationally known lab, ProVerde Laboratories (ProVerde). Proverde is an ISO 17025 Accredited Laboratory under the direction of Dr. Christopher Hudalla, the Chief Scientific Officer. Dr. Hudalla, has an extensive analytical chemistry background which includes experience with super critical CO2 extraction as well as extraction testing and formulation of marijuana for preparation of infused products.

## **B. Sample Testing**

The release of the batch as a distribution product will consist of testing a sample according to a written and approved Specification after harvest and processing. The test lab will perform all of the required testing using the current United States Pharmacopeia. The tests are: Cannabinoid Potency testing, moisture %, Microbial Panel (as per United States Pharmacopeia (USP) chapter <2023>), Chemical Contamination (as per USP chapter <561>) including: Aflatoxin B1, Aflatoxin Sum (B1+B2+G1+G2, and Ochratoxin A), and Pesticides, and Heavy Metals according to USP chapter <231>. Physical Appearance assessment and weight of material will be performed on site utilizing approved calibrated test equipment. The Quality Assurance person will then review the specification for the material being produced to verify all of the test qualifications sent were met.

## **C. Batch Release**

When the batch records have been reviewed, approved, and have passed specifications, the Quality Assurance person will generate a Certificate of Analysis and Certificate of Compliance and change the status of the material from Quarantine to Release. A Certificate of Compliance will be issued for every batch of marijuana produced. The Quality Assurance

person will reassign the material from “quarantine” to “release” status. No material can be sold until it is released by the licensed grower and Quality Assurance group.

Any medical marijuana which fails to meet approved standards will not be distributed. If medical marijuana is found to be unsuitable for distribution, it will be re-worked or re-processed by growing agents and re-tested. If the marijuana remains unsuitable for distribution after re-testing and growing agents cannot re-work or re-process the product to meet standards, it will be destroyed in accordance with the company’s waste destruction protocols.

The determination to release the batch for distribution consists of the verification and approval of the batch records as well as the verification and approval of the testing against the list of specifications. The Quality Assurance team is the only personnel authorized to make the determination to release the batch and record it in the Batch Release Form. The batch record will be compiled to show the lot released and the name of the Quality Assurance team member who performed the assessment.

#### **IV. Advertising and Packaging**

##### **A. Sanitary Packaging**

The packaging room will be entirely enclosed to facilitate climate control set for optimal packaging moisture levels. A dehumidifier will be utilized to regulate moisture levels in order to reduce adding moisture to the packaging room environment. The temperature and humidity of the room will be maintained at optimal levels of 60-70 degrees Fahrenheit with 35-50% humidity levels. Packaging agents will record the climate and humidity level from the thermostat and initial a timesheet to verify that a packaging agent checked the climate of the packaging room every two hours. Air purifiers will be utilized to clear dust contaminants from the air to prevent contamination from dust particulate during the packaging process. Hairnets, hats, masks, gloves,

and non-loose clothing will be mandatory for agents packaging marijuana in the packaging room. In addition, staff responsible for the monitoring of and caring for the plants must shower upon arrival, wear full-bodied lab outfits including masks, hairnets, gloves and glasses, and walk through a highly pressurized “air scrub” machine prior to entering the medical marijuana cultivation or processing area.

Once the product is packaged in sealed containers it will be transferred to the walk-in vault to be stored in a clean, cool, dark, and secure environment. The walk-in vault will be in close proximity to the packaging room. The packaging room will have non-porous plastic wall panels, stainless steel tables and floor drains to aid cleaning and sterilization. Agents will be responsible for cleaning and sterilizing the packaging room after each batch is packaged. Each room will be thoroughly sanitized and decontaminated between packaging cycles. We will utilize catalytic oxidation and ionization to eliminate contaminants in the air and on surfaces.

Packaging materials will be stored in the packaging room so that the material is acclimated to the room’s temperature and humidity. At the conclusion of operating hours, agents will return all packaged marijuana in the packaging area to the walk in vault to be stored overnight.

## **B. Compliant Labels**

Green Leaf Group’s master product design defines the specifications for packaging. A packaging prototype has been developed illustrating 100% compliance with all packaging requirements. The simple design, subject to approval of the State of Hawaii, includes required safety text, contact information, product information, a company logo and a small marijuana leaf outline to help identify the content of the package. Labels will not be appealing to children. All packaging will be consistent. Small packages may use a prescription style folded label.

## **V. Finished Marijuana-Infused Products**

### **A. Quality Assurance for Finished Products**

Once the batch is packaged in its immediate container with the expiration date, it will be assigned a LOT number. If the batch does not meet specifications, the Quality Assurance Manager will reject the product and determine if reprocessing is required or identify it for destruction. In both instances an investigation and report are generated.

### **B. Shipment Inspections**

When products are transported to our dispensary, the Dispensary Agent (DA) receiving the incoming shipment will inspect the shipment to verify the integrity of the products, including a visual inspection to ensure the packaging is intact and the products are secure, undamaged and appropriately labeled. The DA transports the shipment to the Inventory Control Specialist (ICS) and places the items from the shipment in a segregated, secure area until they are inspected by the ICS.

The ICS logs each product into BioTrack as inventory and performs a visual inspection of the packaging for each product received to verify that the product is undamaged, accurate and complete. The ICS also checks all products for quality by checking the products against the Standards Sheet provided by the Quality Assurance team. Each product's Standards Sheet includes photos of the product, its packaging and labeling requirements, and any other standards applying to that product. The ICS makes any notations about damaged products or products unsuitable for use in BioTrack. If there are any damaged products the item will be marked as "damaged" in BioTrack and will remain in the segregated, secure area for analysis and investigation.



Green Leaf Group, LLC  
d/b/a Hawaiian GreenLeaf Company, LLC  
290 Karsten Drive  
Wahiawa, Hawaii 96786  
(808) 864-3583

**Affidavit of Gregory F. Daniel, MD, CEO**

I, Gregory F. Daniel, MD, affirm:

1. That I am the Chief Executive Officer for Green Leaf Group, LLC d/b/a/ Hawaiian GreenLeaf Company, LLC ("Green Leaf"); and

2. 

**I affirm that the above and foregoing representations are true and correct to the best of my information, knowledge and belief.**

  
Date 1/22/16

STATE OF NEW YORK     )  
COUNTY OF Erie     ) SS:

On this 22 day of January in the year 2016 before me, the undersigned, personally appeared Gregory F. Daniel, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument

ANDREA CHARON RIVERS  
NOTARY PUBLIC  
STATE OF NEW YORK  
NOTARY ID 01RI6325758  
MY COMMISSION EXPIRES JUNE 1, 2019

