

AERIAL RENDERING

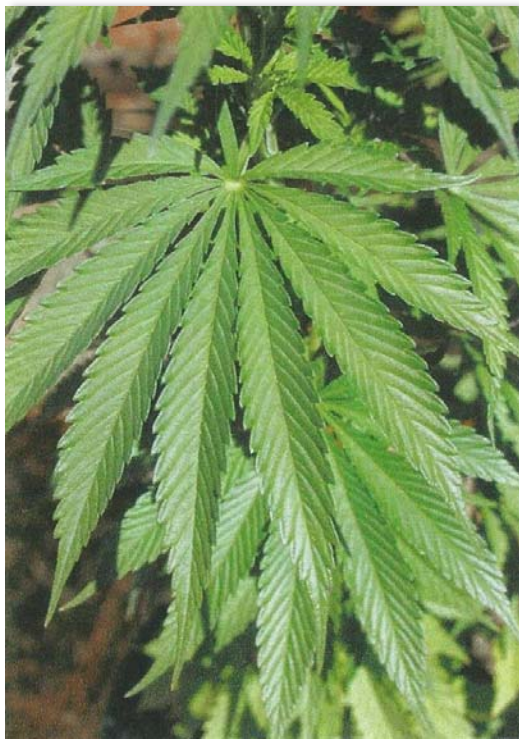
DATE JAN 28, 2016 DRAWING TITLE AERIAL RENDERING	PROJECT NO. 8092	DESIGNED BY D. BAKER	DRAWN BY J. PINEY	REVISIONS	SCALE	PROPOSED PRODUCTION Hale O Lailima 94-540 Lanikuluana Ave. Mililani, HI 96789	FAngel rchitects, LLC 1004 Lincoln Highway East Lancaster, PA 17602 (717) 292-8021 fax 302-7140
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5.7 Exhibit 7: Marijuana Plant Info

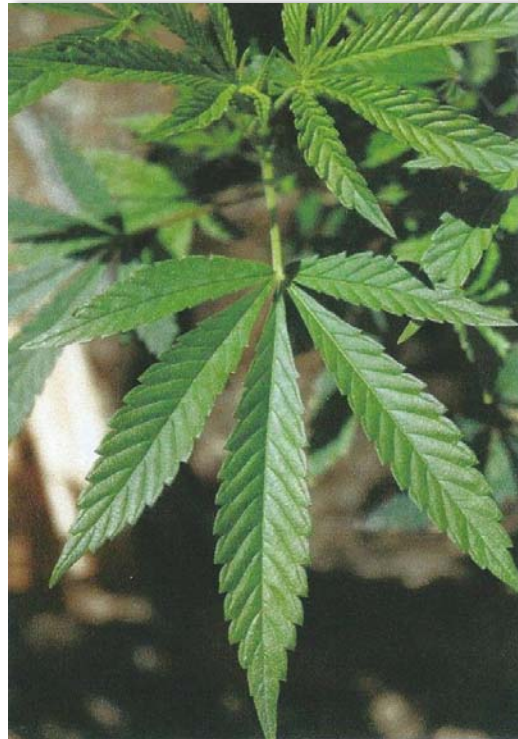
5.7.1 Basic Plant Botany and Anatomical Characteristics

5.7.1.1 Types of Marijuana

There are four types of marijuana: sativa, indica, ruderalis, and hemp. The Hale O Laulima will cultivate sativa, indica, and hybrids of these two types. The sativa gene pool includes hemp fiber and seed landraces from Europe, Central Asia, and Eastern European ruderalis accessions. The indica gene pool originates from Southern Asia, Africa and South America. Generally, sativa plants are known to have narrow-leaflets, while indica plants typically have wide-leaflets. The botanical characteristics of the marijuana leaf are displayed in Figure 1. Widespread interbreeding has made generalizations of the "types" of marijuana botanically imprecise¹. However, these generalizations still offer basic guidance in plant identification.



1a.



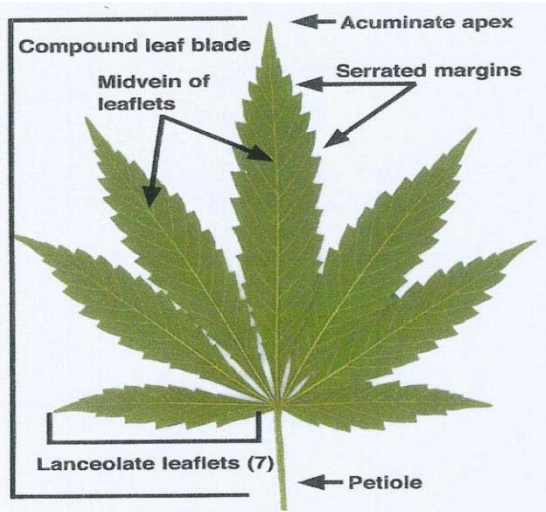
1b.

Figure 1: Botanical characteristics of the marijuana leaf

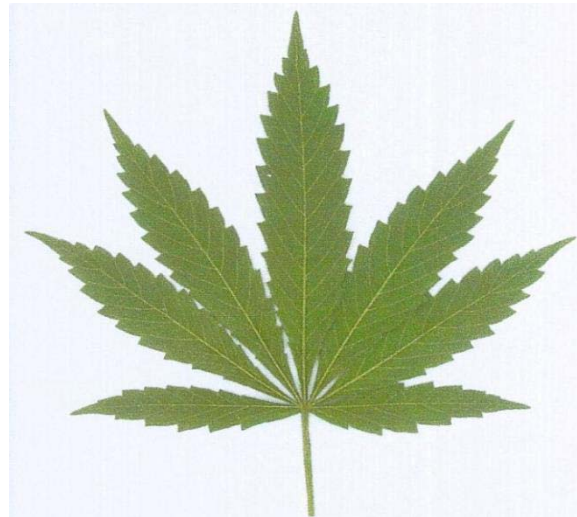
1a. Adaxial (upper) surface of a typical marijuana leaf (9 leaflets).

1b. Adaxial (upper) surface of a typical marijuana leaf (5 leaflets).

¹ Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. Vol. 11, 2 p



1c.



1d.



1e.

1f.

Figure 1 (Continued): Botanical characteristics of the marijuana leaf

1c. Adaxial (upper) surface of a typical marijuana leaf with morphological characteristics highlighted.

1d. Abaxial (lower) surface of a typical marijuana leaf.

1e. Upper and lower surface of broad-leaf strain ("indica" type).

1f. Upper and lower surface of narrow-leaf strain ("sativa" type).

Source: American Herbal Pharmacopoeia, Marijuana Inflorescence (2014).

5.7.2 Morphological Characteristics of Marijuana

Height and degree of branching depends on both genetic and environmental factors. Figure 2 below shows the morphological characteristic of marijuana.

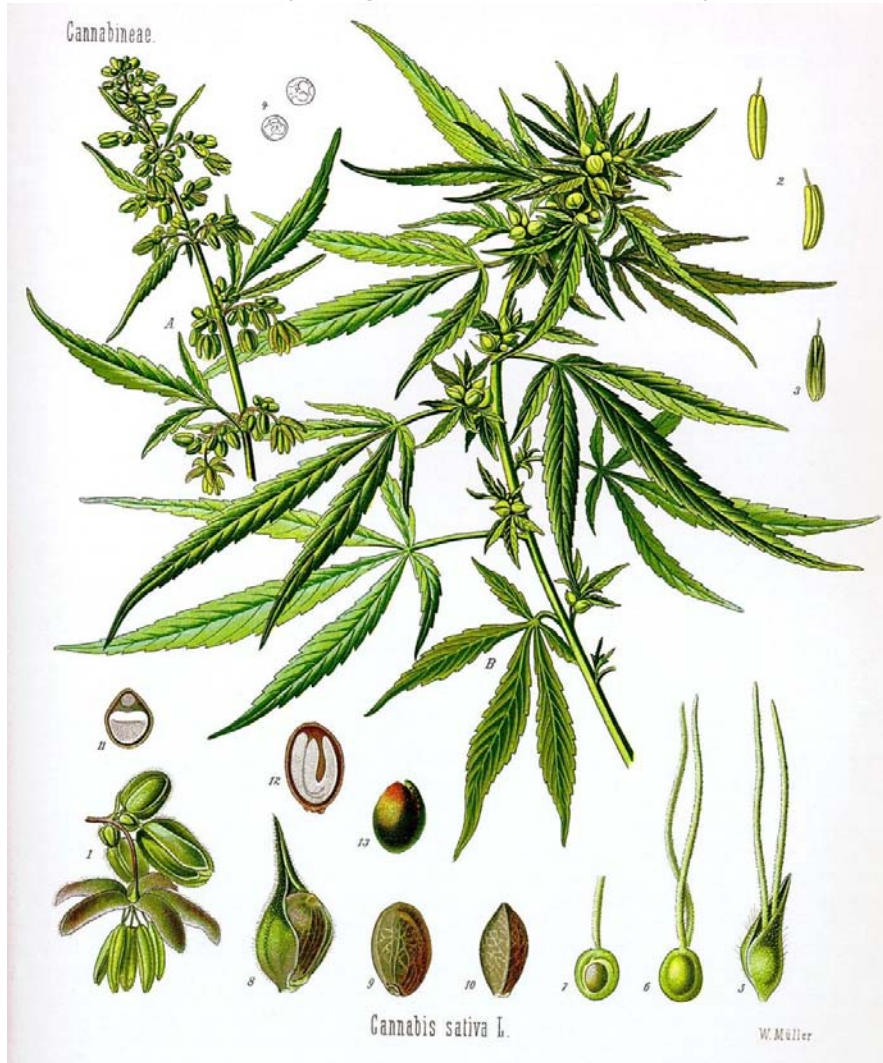


Figure 2: Morphological characteristics of Marijuana

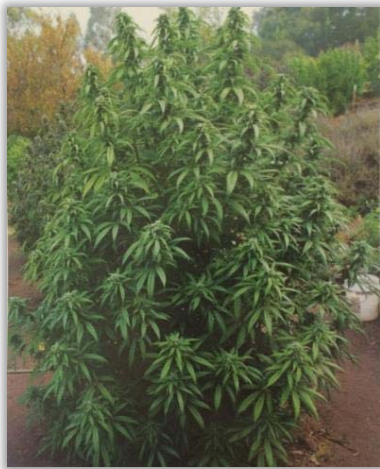
- A. Inflorescence of male (staminate) plant.
- B. Fruiting female (pistillate).
- a. Staminate flower.
- b. Stamen (anther and short filament).
- c. Stamen.
- d. Pollen grains.
- e. Pistillate flower with bract.
- f. Pistillate flower without bract.
- g. Pistillate flower showing ovary (longitudinal section).
- h. Seed (achene) with bract.
- i. Seed without bract.
- j. Seed (side view).
- k. Seed (cross section).
- l. Seed without pericarp (peeled).

Source: Köhler, *Medizinal-Pflanzen in naturgetreuen Abbildungen und kurz erläuterndem Texte* (1887).

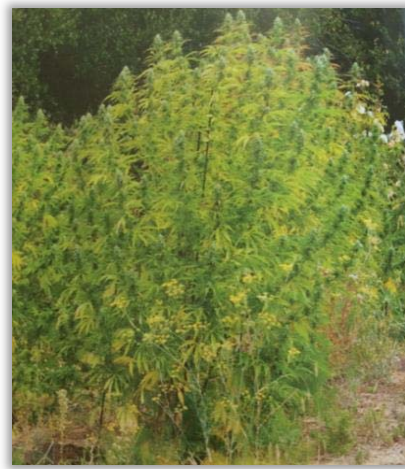
5.7.3 Botanical Characteristics of Marijuana Inflorescences

5.7.3.1 Flowering Cycles

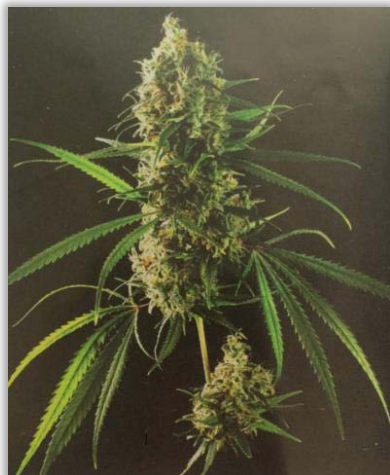
Some selections of marijuana are day-neutral, also known as "auto-flowering". These varieties will flower under any day-length, whereas most varieties are short-day-length plants (needing a long, usually greater-than or equal to 14 hours (h), dark period) and shift from vegetative to reproductive (flowering) growth upon exposure to short day-length conditions². These selections will not be utilized in Hale O Lahilima's Production Facilities. Figure 3 shows the botanical characteristics of a female marijuana plant during a flowering cycle.



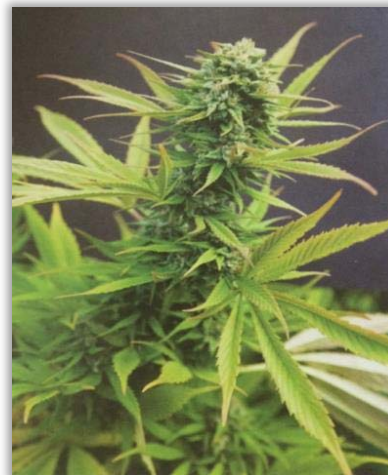
3a.



3b.



3c.



3d.

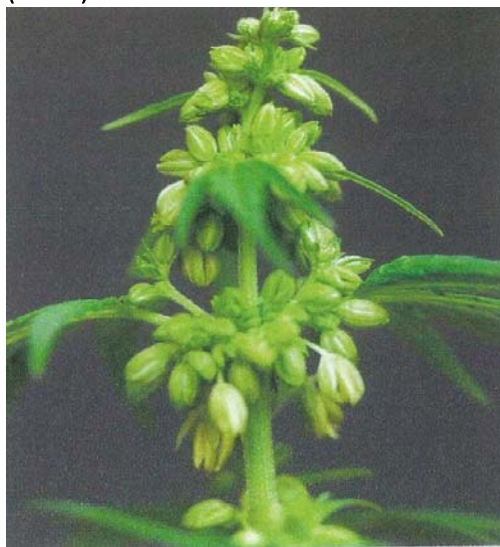
² Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. *American Herbal Pharmacopoeia*. Vol. 11, 8 p.

Figure 3 Botanical Characteristics of marijuana inflorescences in flowering cycle

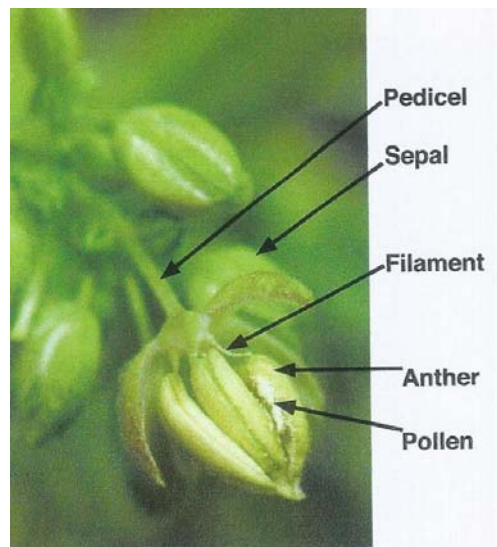
- 3a. Full view of mature high-THC-producing female (pistillate) plant.
 - 3b. Full view of mature high-CBD-producing female (pistillate) plant.
 - 3c. Long dense raceme of a high THC-producing female plant bearing pistillate (female) flowers.
 - 3d. Inflorescence of a high CBD-producing (CBD:THC ratio 30:1) female plant (note long slender leaves).
- Source: American Herbal Pharmacopoeia, *Marijuana Inflorescence* (2014).
Source: American Herbal Pharmacopoeia, *Marijuana Inflorescence* (2014).

5.7.3.2 Marijuana Gender

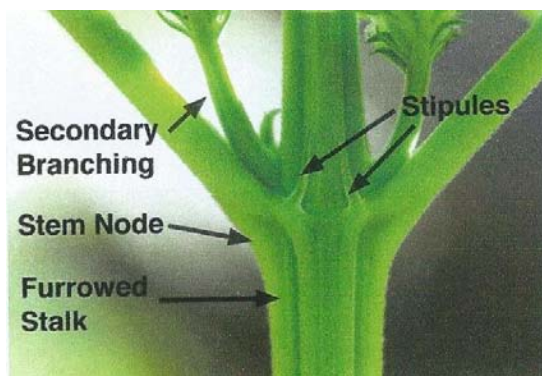
Morphological characteristics of marijuana staminate (male) plants tend to be taller but less robust than pistillate (female) plants. Female plants produce the marijuana flower, while male plants produce the seeds. Figure 4 shows the botanical characteristics of marijuana staminate (male) flower and stem.



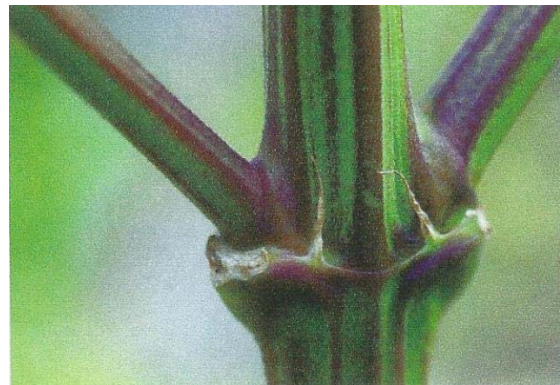
4a.



4b.



4c.



4d.

Figure 4: Botanical Characteristics of marijuana staminate (male) flowers and stem

- 4a. Male (staminate) flowers.
- 4b. Close-up male flowers showing primary floral characteristics.
- 4c. Vegetative stem of mature plant showing node, furrows, stipules, and axillary branching.
- 4d. Stalk of purple variety.

5.7.3.3 Microscopic identification

The primary source of cannabinoids in Marijuana is the upper leaves of female flower heads, as well as the female flower bracts. The cannabinoids are enclosed in tiny glandular trichomes that exist in a variety of forms: sessile glands (trichomes without a stalk); small bulbous glandular trichomes with one-celled stalks; and long, multicellular-stalked glandular trichomes mainly present on bracts and bracteoles surrounding female flowers³. Table 1 describes the microscopic characteristics of marijuana inflorescence powder. Figure 5 displays a visual guide for microscopically identifying the botanical characteristics of marijuana.

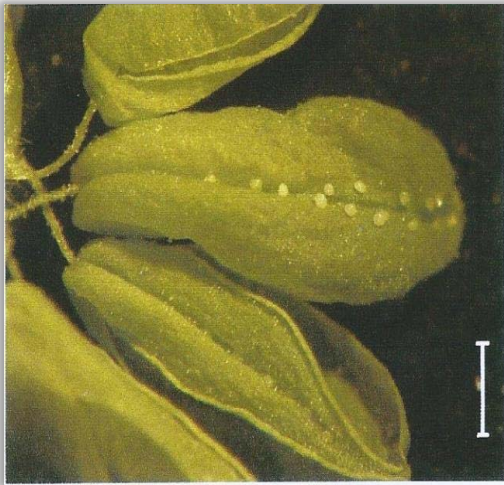
Table 1 Microscopic characteristics of cannabis inflorescence powder

Bracts	Polygonal upper epidermis cells with faintly striated cuticle and few trichomes; sinuous-walled lower epidermis cells with anomocytic stomata and abundant trichomes; small clusters of calcium oxalate in the mesophyll cells.
Bracteoles	Polygonal upper epidermis cells with beaded walls; sinuous lower epidermis cells with slightly beaded walls, anomocytic stomata, and tapering, unicellular covering trichomes; mesophyll similar to that of bracts, containing calcium oxalate clusters.
Trichomes and glands	Glandular and non-glandular trichomes.
Stigma	Fragments occurring as epidermal cells with reddish-brown papillae.
Seed	Fragments mainly visible as thick-walled sclereids of the epicarp.
Stem	Occurring as epidermis with large cystolith trichomes, parenchyma containing clusters of calcium oxalate, fibers, which are normally unligified, vessels lignified with reticulate or annular thickening, and lactiferous tissue containing red-brown contents.
Bracts	Polygonal upper epidermis cells with faintly striated cuticle and few trichomes; sinuous-walled lower epidermis cells with anomocytic stomata and abundant trichomes; small clusters of calcium oxalate in the mesophyll cells.
Leaflet	Upper epidermis cells wavy-walled with striated cuticle, stomata absent, sessile glandular trichomes and cystolith trichomes abundant; lower epidermis wavy-walled cells with anomocytic stomata and all trichomes characteristic of cannabis.

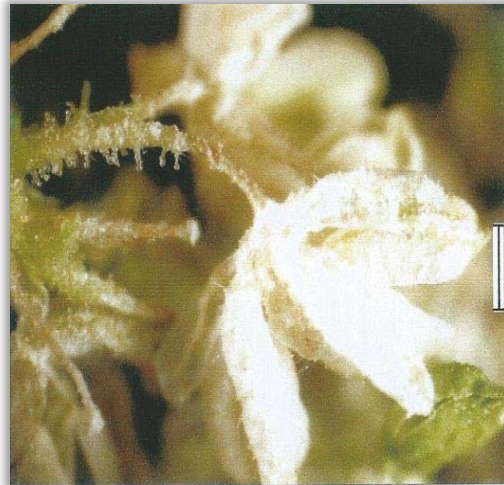
Table 1: Microscopic characteristics of Marijuana inflorescence powder.

Source: American Herbal Pharmacopoeia, Marijuana Inflorescence (2014).

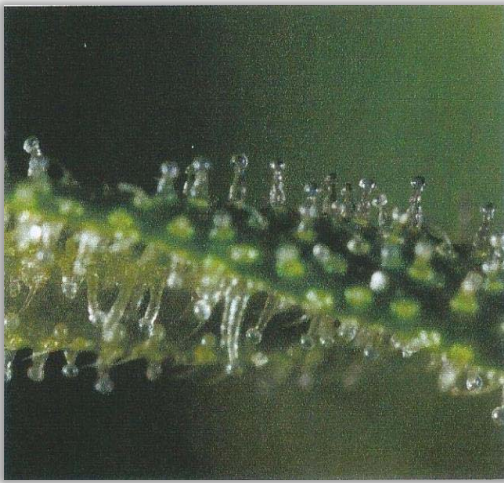
³ Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. Vol. 11, 8 p.



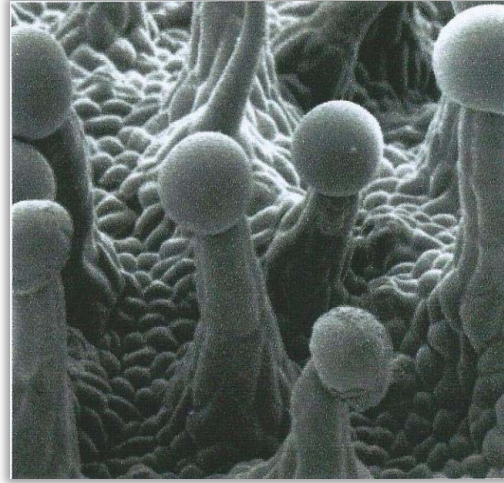
5a.



5b.



5c.



5d.

Figure 5: Microscopic characteristics of marijuana inflorescences

5a. *Trichomes along anther scale.*

5b. *Trichomes along filament scale.*

5c. *Close-up of glandular trichomes.*

5d. *Magnification of multicellular glandular trichomes with electron microscopy*

Photographs courtesy of: (5a-b) The Wo/Men's Alliance for Medical Marijuana (WAMM), Santa Cruz, CA; (5c) Gianpaolo Grassi, CRA-CIN, Industrial Crop Research Center, Rovigo, Italy; (5d) © 2013 David J Potter, Salisbury, UK.

5.7.3.4 Macroscopic Identification

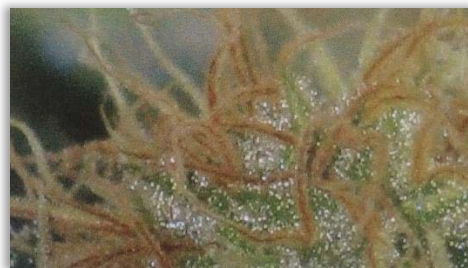
The variety of color, shape, size, and other morphological characteristics of marijuana are influenced by environmental conditions, including light, water, nutrients, method of cultivation, harvesting and curing⁴. Figure 6 displays a visual guide for macroscopically identifying the botanical characteristics of marijuana inflorescences.



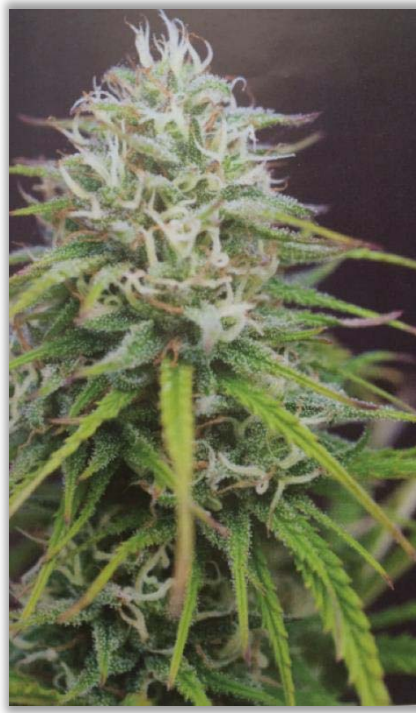
6a.



6b.



6c.



6d.

Figure 6: Macroscopic characteristics of marijuana inflorescence

6a. Maturing female inflorescence showing young yellow styles and stigmas (often referred to as "pistils").

⁴ Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. Vol. 11, 9 p.

- 6b. Close-up of maturing female inflorescence showing young yellow styles and stigmas senescing brown and shriveling and an abundance of glandular trichomes.
- 6c. Female inflorescence with senesced reddish-brown styles and stigmas, an indicator of inflorescence maturity.
- 6d. Close-up of female inflorescence with senesced reddish-brown styles and stigmas.



6e.



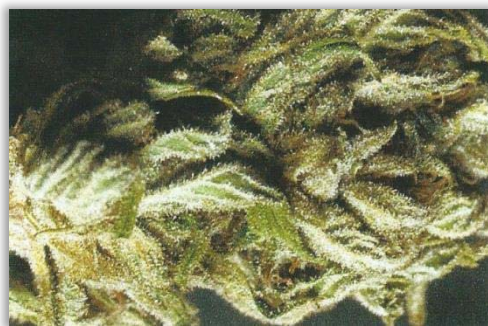
6f.



6g.



6h.



6i.



6j.

Figure 6 (continued): Macroscopic characteristics of marijuana inflorescence

- 6e. Dried, untrimmed pistillate inflorescences of morphological type "sativa".
- 6f. Dried pistillate inflorescences of morphological type "sativa" (bottom - untrimmed; top - trimmed).
- 6g. Storage effects on color of marijuana material (left - 1-year-old; right - new harvest).
- 6h. Dried pistillate inflorescences of morphological type "indica" (bottom - untrimmed; middle and top - trimmed).
- 6i. Close-up of a dried pistillate inflorescence (note the visible glandular trichomes).
- 6j. Powdered dry marijuana material (leaves and pistillate inflorescences).



Title: State of Hawai'i Department of Public Health, Medical Marijuana Dispensary License Application
Merit Criteria Question 05

Date: January 29, 2016

Source: American Herbal Pharmacopoeia, Marijuana Inflorescence (2014)

Photographs courtesy of: (6a-e) WAMM, Santa Cruz, CA; (6f) University of Mississippi, University, MS.



5.7.4 Constituents of Marijuana

More than 750 different secondary metabolites have been identified in marijuana. The large diversity of marijuana constituents, most notably cannabinoids, include secondary metabolites that are categorized into different classes of marijuana constituents. These categories include terpenoids, non-cannabinoid phenols, nitrogenous compounds, and other more common plant compounds⁵.

5.7.4.1 Cannabinoids

Cannabinoids are the most well-known and studied chemical constituents of marijuana and are generally accepted as the main medicinal ingredients of marijuana. The most commonly known cannabinoid is tetrahydrocannabinol (THC), which is also the compound that is largely responsible for the psychoactive effects of consuming marijuana. Already more than 70 different cannabinoids have been identified and the biological effects of these compounds are quite different than THC, as they do not have psychoactive potential⁵. The cannabinoid profile is influenced most by the sex, genotype and maturity of a plant, followed by environmental conditions including light intensity, light cycle and temperature⁶. The following list includes medicinal benefits of commonly found cannabinoids:

- Tetrahydrocannabinol (THC) - antispasmodic, psychoactive, analgesic
- Cannabinol (CBN) - mildly psychoactive, antispasmodic, anti-insomnia
- Tetrahydrocannabivarin (THCV) – appetite suppressant
- Cannabichromene (CBC) - anti-inflammatory, antimicrobial, vasoconstriction
- Cannabidivarin (CBDV) - bone-stimulant, non-psychoactive
- Cannabidiol (CBD) - anti-diabetic, antiepileptic, anxiolytic
- Tetrahydrocannabinolic Acid (THCA) – anti-inflammatory and neuro-protective
- Cannabigerol (CBG) - anti-bacterial, bone stimulant, antiproliferative
- Cannabidiolic acid (CBDA) - anti-inflammatory, intestinal anti-prokinetic, antiproliferative

(Source: CannLabs, <http://www.cannlabs.com/the-science/cannabinoids/>, Accessed: January 27, 2016.)

5.7.4.2 Cannabinoid Acids

Cannabinoids occur mainly in a carboxylated form where the compounds maintain an acid tail, or "coating", and are devoid of psychoactive effects. In fresh, unheated plant material, virtually

⁵ Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. Vol. 11, 32 p

⁶ Ibid, 33 p



no non-carboxylated cannabinoids exist. Cannabinoids will begin to lose their acid coating when exposed to heat, light, or combustion. Heating for five (5) minutes at 200-210°C has been reported to be effective for conversion of carboxylated cannabinoids into non-carboxylated cannabinoids⁷.

5.7.4.3 Major Cannabinoids

The following are cannabinoids that occur more frequently in marijuana:

- Tetrahydrocannabinol (THC)
- Tetrahydrocannabinolic Acid (THCA)
- Tetrahydrocannabivarin (THCV)
- Cannabidiol (CBD)
- Cannabigerol (CBG)
- Cannabidiolic acid (CBDA)

5.7.4.4 Minor Cannabinoids

The following are cannabinoids that occur less frequently in marijuana:

- Cannabielsoin (CBE)
- Cannabitriol (CBT)
- Cannabichromene (CBC)
- Cannabidivarin (CBDV) - bone-stimulant, non-psychoactive

5.7.4.5 Terpenoids

Terpenoids are primarily responsible for the aroma and flavor of marijuana. Distinct aromas and flavors correspond to certain varieties and strains of marijuana, though this may vary between different batches of the same seed source⁸.

5.7.4.6 Monoterpenoids

Monoterpenoids generally comprise 47.9% to 92.48% of the volatile oil extracted from fresh plant material. Monoterpenoids are volatile compounds that degrade during the drying and curing of marijuana. While there is a potential for these compounds to act as pro-drugs of pre-cannabinoids, the biological profile is currently unknown and has yet to be successfully tested⁹.

⁷ Ibid, 34 p

⁸ Chandra S, ElSohly M, Lata H. 2013. Marijuana Inflorescence: Standards of Identity, Analysis, and Quality Control. American Herbal Pharmacopoeia. Vol. 11, 36 p

⁹ Ibid, 37 p



5.7.4.7 Sesquiterpenoids

Sesquiterpenoids generally comprise 6.84% to 47.5% of the oil extracted from fresh plant material. The levels of sesquiterpenoids generally increase after drying and curing due to the decrease in levels of the more volatile monoterpenoids¹⁰.

5.7.4.8 Flavonoids

There are currently more than 29 flavonoids that have been identified in marijuana, and two classes of flavonoids: flavones and flavonols. Research of flavonoids from other medicinal plants suggests many potential uses, though it is unknown if these uses have clinical relevance to marijuana⁹.

5.7.4.9 Trichomes

Cannabinoids, terpenoids, alkanes, and other compounds are produced inside the glandular trichomes. Types of distribution of marijuana trichomes are displayed in Table 2 on the following page.

¹⁰ Ibid, 40 p


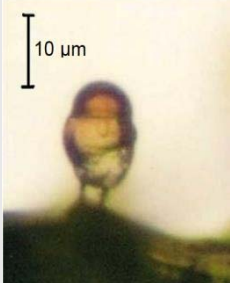
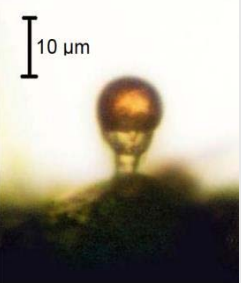



Trichome type	Cannabinoid-producing	Distribution	Images
Glandular sessile (unstaked) glands	Yes	All aerial epidermal tissues Especially abundant on the underside (abaxial) surface of leaves and bracts and outer surface of bracteoles.	
Glandular bulbous (one-cell-staked) trichomes	Possibly	All aerial epidermal tissues	 
Glandular multicellular -stalked trichomes	Yes	Bracts, bracteoles, and (rarely) on uppermost leaves; both surfaces.	
Non-glandular cystolithic trichomes	No	Leaves, bracts; mostly upper epidermis only.	
Non-glandular non-cystolithic trichomes	No	All aerial epidermal surfaces.	

Table 2: Types of distribution of marijuana trichomes.

Photographs © 2013 David J. Potter, Salisbury, UK.



5.8 Exhibit 8: Product Line

5.8.1 Purpose

The creation and development of the Hale O Lahuli Product Line has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQUPP) that patients deserve.

HAR Requirement	Description
§11-850-71.a	A dispensary licensee may dispense marijuana only in the form of dried matured processed flowers of female marijuana plants.
§11-850-71.b	A dispensary licensee shall establish and maintain a written policy and procedure that includes but is not limited to:
§11-850-71.b.1	Safe and appropriate use of equipment;
§11-850-71.b.2	Effective training and monitoring of employees and subcontractors who participate in the production of marijuana;
§11-850-71.b.3	Adequate protocols for laboratory testing of marijuana pursuant to this chapter; and
§11-850-71.b.4	Safe and appropriate storage and disposal or destruction of marijuana at all stages of production and sale.
§11-850-71.c	A dispensary licensee shall report to the department prior to producing marijuana the strains of marijuana to be cultivated by the dispensary. Eff. DEC 14 2015
§11-850-72.a	A dispensary licensee may manufacture marijuana products limited to capsules, lozenges, pills, oils and oil extracts, tinctures, ointments, and skin lotions.
§11-850-72.b	A dispensary licensee shall establish and maintain a written policy and procedure that includes but is not limited to:
§11-850-72.b.1	Safe and appropriate use of manufacturing equipment;
§11-850-72.b.2	Safe and appropriate storage of materials used to produce manufactured marijuana products;
§11-850-72.b.3	Effective training and monitoring of employees and subcontractors who participate in the production of manufactured marijuana products;
§11-850-72.b.4	Adequate protocols for laboratory testing of manufactured marijuana products pursuant to this chapter; and
§11-850-72.b.5	Safe and appropriate storage and disposal or destruction of manufactured marijuana products at all stages of production and sale.
§11-850-72.c	A dispensary licensee shall report to the department prior to producing any manufactured marijuana products:
§11-850-72.c.1	Strains of marijuana to be used by the dispensary to produce manufactured marijuana products;
§11-850-72.c.2	Types of manufactured marijuana products that the dispensary will produce;
§11-850-72.c.3	The manufacturing process or processes the dispensary will use in producing manufactured marijuana products. Eff. DEC 14 2015

5.8.2 Local Compliance

In accordance with the requirements defined by Hawai'i Administrative Rules Chapter(s): 11-850-71, 11-850-72 and enforced by the Hawai'i DOH, Hale O Lahuli has developed a Recall and Withdrawal policy and procedure to manage any product non-conformance found at any time in the supply chain or at the request of the Hawai'i DOH. Recall and Withdrawal procedures assure each step in our manufacturing and distribution processes is carefully performed and controlled. Hale O Lahuli quality assurance and control activities relating to controlled substance manufacturing will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-71 and §11-850-72



5.8.3 Product Line

It is Hale O Lahilima policy to maintain a medically focused product line that avoids unnecessary and irresponsible food products or sugary drinks that are unhealthy or would appeal to children in any way. Hale O Lahilima is committed to providing a variety of marijuana products to qualified registered patients, but will not provide products that must be smoked. Marijuana products offer patients the benefits of cannabinoids and the other medicinal properties of marijuana without the potential dangers related to the combustion of plant material. Our focus is to provide safe and effective marijuana products that provide relief from state-approved debilitating medical conditions. Hale O Lahilima intends to produce products for dispensing to qualified registered patients through its processing methodologies and procedures as described in this Product Line Plan.

5.8.4 Responsible Product Line Production

No marijuana products or their packaging will bear a reasonable resemblance to any product available for consumption as a commercially available candy or other product potentially desirable to children.

5.8.5 Prohibited Products

It is the policy of Hale O Lahilima to prohibit the use of meat and dairy as an ingredient in any product produced by the Dispensing Organization. Due to potential for food-borne illness, no marijuana products requiring refrigeration or hot-holding or considered potentially hazardous food will be manufactured by the Dispensing Organization. Hale O Lahilima will not produce marijuana or associated marijuana products that may be smoked.

5.8.6 Product Line Variety

It is Hale O Lahilima policy to produce a large variety of marijuana product offerings to provide relief to as many Hawai'i qualified registered patients as possible. The Production Manager will aim to produce the greatest variety of medically toned marijuana products possible from available marijuana by-product, for which a description of each, along with the processes used to develop them, is contained within this Product Line Plan. It will be important for Hale O Lahilima to produce and dispense various marijuana products providing a variety of ingestion methods to best serve patients and considerate of their condition type, physical limitations of ingestion and personal preference.

5.8.7 Research and Development

Hale O Lahilima aims to continually improve production techniques and marijuana product offerings through on-going research and development projects led by the Laboratory Director and Production Manager, with input from the Medical Director as necessary or desired.



Research and development performed by Hale O Laulima will explore new processing techniques and product inputs, increasing efficiency in production operations, and improving product efficacy. The Laboratory Director will retain and use all production data and patient data, sample results, inspection reports, and other company records to use as part of Hale O Laulima's official research and development efforts. The Laboratory Director and Production Manager, in coordination with the COO will continually look at emerging technology and changes to best practices, and maintain on-going communication about company research and development efforts.

5.8.8 Approved and Tested Products Only

Only marijuana products meeting the standards described in all parts of the application will be released from the processing facility for sale at the dispensary facilities. All batches of finished marijuana product will be analyzed in the Dispensing Organization's on-site laboratory by the internal Laboratory Director and verified by a representative of an independent testing laboratory using Hale O Laulima's analytical equipment prior to final packaging and release of product for transport to the dispensary facilities [see Inventory Control and Management SOP]. Each dispensary will only provide high quality, consistent, medically toned products that are safe for human consumption, meet product specifications, and are tailored to the needs of qualified registered patients.

5.8.9 Marijuana Flower

Hale O Laulima will offer marijuana flower as a product offering, focusing on strains carrying characteristics similar to those listed below, understanding that actual strain availability will be dictated by what Hale O Laulima can obtain. All strains below will be used in the production of all products above, creating versatile medicine delivery options for patients. Understanding that each condition and patient responds to different cannabinoid profiles and ingestion delivery methods, Hale O Laulima is committed to consistently providing a full spectrum of each. Hale O Laulima will focus on procuring and distributing CBD rich strains as they have proven successful as an analgesic, anti-inflammatory, anti-spasmodic, anti-diabetic, anti-epileptic and more. Hale O Laulima will use all efforts to educate patients on the potential negative side effects that can result from the combustion inhalation of marijuana and provide information about alternative methods of consumption.

5.8.9.1 Strains

5.8.9.1.1 R4

CBD: >20%

THC: <1%

One of the most well known high-CBD ratio strains, R4 offers an unmatched ratio of CBD to THC, which provides maximum pain and seizure relief without a psychoactive effect. This strain



has similar properties to that of the acclaimed Charlotte's Web and can be used in the treatment of seizures, epilepsy and other nerve related conditions.

5.8.9.1.2 Harlequin

CBD: >16%

THC: <7%

Harlequin's 2:1 CBD:THC ratio offers patients the benefits of the collaboration between CBD and THC, which can be very effective in the treatment of pain, muscle spasms, nausea and to alleviate the effects associated with autism.

5.8.9.1.3 Indigo Phenotype #1

CBD: >6%

THC: <2%

Indigo #1's 3:1 CBD:THC ratio offers patients the benefits of the collaboration between CBD and THC, which can be very effective in the treatment of pain, muscle spasms, nausea and to alleviate the effects associated with autism.

5.8.9.1.4 Indigo Phenotype #2

CBD: >6%

THC: >6%

Indigo #2's 1:1 CBD:THC ratio has been proven to be ideal to alleviate the effects associated with autism.

5.8.9.1.5 OG18

OG18, Denver Relief's winner of the 2013 Marijuana Cup award for Best Medical Hybrid, was also tested as the third most potent strain in history by High Times publication.

CBD: <2%

THC: >17%

5.8.9.1.6 Bio-D

Bio-D is a potent 50/50 hybrid, which provides the lucid and energetic effects associated with a sativa in combination with the pain relief qualities generally found in an indica. Bio-D was listed as the 10th most potent strain in the world in 2012 and was winner of Best Medicine in Colorado at the 2009 Medical Marijuana Harvest Cup.

CBD: <2%

THC: >17%



5.8.9.1.7 Blue Dream

Through the collection of patient completed bio-assessment sheets, Denver Relief has determined that Blue Dream serves as a powerful anti-nausea medicine, particularly in cancer patients engaging in chemotherapy treatments.

5.8.9.1.8 Durban

Durban is the “coffee” of the marijuana world and is an uplifting and motivating daytime medicine that allows patients to function during activities where focus is important. Use of high-THC sativas won't physically suppress pain in patients, but allows them to keep their mind off their pain while they focus on life's activities.

CBD: <2%

THC: >13%

5.8.9.1.9 Reserva Privada

Similar to OG18, Reserva Privada is a potent indica dominant strain known for its pain relieving qualities and ability to induce sleep.

5.8.9.1.10 Gumbo

Through bio-assessment sheet collection from patients at DR, Gumbo has been identified as an ideal strain for appetite stimulation, particularly in cancer patients engaging in chemotherapy treatments.

CBD: <2%

THC: >14%

5.8.9.1.11 AC-DC

AC-DC, a sativa-dominant marijuana strain, is particularly beneficial for patients with cancer, and the associated inflammation, pain, and nausea that typically come with cancer treatment. Test results have shown CBD content in AC-DC to be as high as 19%. The CBD to THC ratio is typically around 20:1, meaning the strain induces no psychoactive effect while having an abundance of medically effective CBD. This strain has also shown success in the treatment of medical marijuana patients with epilepsy, especially in children, and reportedly produces immediate results.

CBD: >18%

THC: <1%



5.8.10 Manufactured Marijuana Products

Pursuant to §11-850-72.a, Hale O Laulima may manufacture the following products:

5.8.10.1 Marijuana Extract Oil:

The ingestion of marijuana oil extracts through vapor inhalation eliminates the ill effects surrounding the consumption of combusted plant material, which creates smoke and carcinogens that can lead to health issues. Vapor inhalation allows the patient to consume a high dose of medicine in a short amount of time with immediate effect onset. Marijuana oil extracts are more potent by volume than flower and are used by patients to quickly manage intense symptoms. Hale O Laulima will provide standalone marijuana extract oil for use in personal patient vaporization devices and are also available in further processed marijuana products offered by Hale O Laulima.

5.8.10.2 Ingestible Marijuana Products

Although this method on consumption may take 30-60 minutes for the patient to reach optimal effect after consuming, ingestion of marijuana products offers the longest duration of effect for patients, which can last up to 6-8 hours, providing long lasting relief, especially during sleep. Hale O Laulima will not promote the use or produce edible marijuana products that are unhealthy or appealing to children, which have proven to be a growing problem in other regulated states. Instead, Hale O Laulima will focus primary on strictly dosed capsules, including those housed within a time-release coating for dosing over an extended period of time. Hale O Laulima will also procure and distribute a small variety of cooking related marijuana products, which allow a patient to incorporate their medicine in with their daily meals, which can be a benefit for the sickest patients. These products would include olive oil, for example. Hale O Laulima will provide marijuana products in a variety of strengths and cannabinoid profiles to qualified patients, including CBD-rich and CBD-only products. Marijuana products offer the benefits of cannabinoids without the combustion of plant material. Ingesting marijuana products also offers the longest duration of effect for patients, providing long lasting relief, especially during sleep. Many patients require a variety of oral delivery methods based on their condition, the time of the day and other personal preferences. Hale O Laulima will not provide nor promote the use of ingestible marijuana products that are unhealthy or appealing to children. Instead, Hale O Laulima will focus on providing strictly dosed ingestible products formulated for consumption by those suffering from debilitating conditions. Our ingestible product offerings include tinctures, lozenges, pills and capsules, and are described as follows:

5.8.10.2.1 Tinctures

Hale O Laulima will provide strictly dosed marijuana extract tinctures, which are easy and economical to produce and use, compact enough to stock in considerable variety and have an enduring shelf life. Historically, before marijuana was banned in 1937, tinctures were the primary form for marijuana medicines. Tinctures are essentially decarboxylated extractions of



whole marijuana mixed with glycerin or another solvent and administered orally. Hale O Lahuli will use a tincture base of vegetable glycerin, which is a safe and effective preservative and aseptic employee when produced according to stringent standards that use the highest quality ingredients available. Many tinctures use alcohol as their base, however alcohol can be toxic to the body and has a number of potential, adverse side effects. As a solvent, alcohol is mechanically conducive to processing herbs, fresh botanicals and resinous compounds. However, the denaturing characteristic of alcohol, while natural and sometimes beneficial, is detrimental to some of the marijuana plant's extracted components, and renders them unusable. This prevents a product from offering the full benefits of the plant matter in question, however vegetable glycerin helps to preserve the biological usability of herbal constituents and compounds. Glycerin-based tinctures will be provided in a variety of application methods including drops and sprays. Hale O Lahuli will provide supplemental education about the use of marijuana tincture products covering titration and dosage control, which is easily achieved by the number of drops or sprays a patient places under their tongue, where the medicine is rapidly absorbed into the arterial system. The tinctures may be flavored for a more desirable taste.

Alcohol based and glycerin based tinctures will be provided in a variety of application methods including drops and sprays. Oral gels and strips will also be procured if available on the market.

5.8.10.2.2 Lozenges

Hale O Lahuli will provide strictly dosed marijuana extract sublingual lozenges, which are dissolved in the mouth to achieve the desired effect. Sublingual tablets and lozenges are typically provided in a multipack with each lozenge having a low dosage amount, allowing qualified registered patients to gradually obtain optimal effects in a predictable and controlled manner. The benefits of taking a marijuana lozenge include a quick onset of, a bypass of metabolic breakdown, the localization of effects to the mouth and are a discreet ingestible option for qualified registered patients. Oro-mucosal application delivers the cannabinoids more slowly into the bloodstream than inhalation, but faster than ingestion. By passing through the mucosal lining of the inner cheek a patient may avoid the gastrointestinal tract, this method of administration prevents first-pass metabolism by the stomach and liver, which breaks down many different molecules into their constituent parts. Lozenges are flavored and/or sweetened so as to be pleasant tasting, though not to a degree that is similar to candies. Lozenges have a localized effect that can be useful for patients with cancers of the mouth and throat, but also produce a systemic effect. The fact that lozenges dissolve slowly in the mouth enhances the localized effect because the medication will be in contact with the mouth and throat tissues for a longer period of time. Furthermore, lozenges provide a pleasant method of administration for patients who are unable to easily swallow other types of solid marijuana products, such as capsules or tinctures. A systemic effect may be obtained by dissolving the product in the mouth and/or swallowing it, though the duration and effects of cannabinoids absorbed through mucous membranes and metabolized in the digestive tract differ. Regardless, this delivery



method will be useful for patients with neurological disorders causing symptoms of spasms and seizures; the absorption of cannabinoids through the mucous membranes of the mouth allows rapid crossing of the blood brain barrier, producing effects on the targeted receptors quickly and efficiently.

5.8.10.2.3 Pills, Capsules:

Hale O Laulima will provide strictly dosed hash oil capsules, including those housed within a time-release coating for dosing over an extended period of time. Hash oil capsules provide an effective, consistent and discreet ingestible option for qualified patients.

Hale O Laulima will provide strictly dosed marijuana extract pills or capsules, including those housed within a time-release coating for consistent dosing over an extended period of time. Pills are the most common means of administering medicines and are a discreet ingestible option for qualified registered patients.

5.8.11 Non-Ingestible Marijuana Products

5.8.11.1 Topical Products: Creams, Lotions and Salves

Hale O Laulima will provide strictly dosed marijuana extract topical products, which can be used to treat local and systemic issues. They offer ease of delivery, facilitate patient compliance, and avoid the problem of first-pass metabolism, generally produced by medicine being metabolized when it passes through the liver. Successful development of a topical formulation requires an understanding of physiochemical properties, such as release characteristics, composition of the drug-delivery system, and the nature of the drug delivery vehicle. Cannabinoids interact with CB-1 and CB-2 receptors that are found in the skin and many patients in legal medical marijuana states have reported positive results from the transdermal effects of topical products. When combined with a skin permeating organic solvent ("permeation enhancer") able to open capillaries, transdermal marijuana applications have shown an efficacy rate three times that of consumption through inhalation or oral ingestion. Hale O Laulima will provide topical products in the form of creams, lotions and salves, all of which have a similar method of production.



Title: State of Hawai'i Department of Public Health, Medical Marijuana Dispensary License Application
Merit Criteria Question 05

Date: January 29, 2016

Strain Name	Dominant Cannabinoid	Sativa / Indica / Hybrid	Tested	CBD-A	CBD	CBN	CBC	THC	THC-A	Max THC	Max CBD	Total Potency	Symptoms Relieved
99 Sliver	THC		YES									26.31 %	
AC-DC	CBD	Sativa-Dominant Hybrid	YES*		19.24 %			0.76		0.76	19.24	20%	Pain, muscle spasms and relieving seizures
AK-47	THC	Sativa Dominant	YES									17.70 %	Depression, headaches, pain, sleeplessness and stress
Avi-dekel	CBD	Sativa	YES*									16.50 %	Pain relief, muscle spasms and insomnia
Bio-Jesus	THC	Indica-Dominant Hybrid	YES	0.10%	0.10%	0.10 %	0.10 %	0.61%	26.10 %	23.50 %		28.57 %	Fatigue, nausea, pain, sleeplessness, stress, migraines and body pain
Bio-Diesel	THC	Hybrid	YES	0.10%	0.10%	0.10 %	0.10 %	0.24%	24.20 %	21.46 %		27.05 %	Anxiety, depression, eye pressure, fatigue, headaches, hyperactivity, inattentiveness, migraines, joint pain and insomnia
Bio-Diesel (LED)	THC	Hybrid	YES									29.16 %	Anxiety, depression, eye pressure, fatigue, headaches, hyperactivity, inattentiveness and migraines
Bio-Diesel 80 Day Black Widow	THC	Hybrid	YES									28.57 %	Anxiety, depression, eye pressure, fatigue, headaches, hyperactivity, inattentiveness and migraines
	CBD	Sativa Dominant	NO										Depression, headaches, muscle spasms, pain, and



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Strain Name	Dominant Cannabinoid	Sativa / Indica / Hybrid	Tested	CBD-A	CBD	CBN	CBC	THC	THC-A	Max THC	Max CBD	Total Potency	Symptoms Relieved
		nt											stress
Blue Dream	THC	Sativa Dominant	YES									23.59 %	Anxiety, depression, hyperactivity, Inattentiveness, inflammation, migraines, mood swings, and nausea
Blue Shark	CBD		NO										
Bubba 98	THC	Indica	YES									21.56 %	
CBD Kush	CBD		NO										
CBD Kush/Dutch Passion	CBD	Hybrid	NO										
Channel 2	CBD	Hybrid	NO	8.48	0.42	0.00 1	0.04	0.29	3.59	3.43	7.86	12.82	Pain, muscle spasms, relieving seizures
Charlotte's Web	CBD	Indica-Dominant Hybrid	YES									20.00 %	Pain, muscle spasms, relieving seizures
Critical Cure	CBD	Indica-Dominant Hybrid	NO										
Critical Mass	CBD	Indica-Dominant Hybrid	YES*	0.001	0.001	0.00 1	0.00 1	0.3	15.6	13.98 %	0.001	14.02	Depression, fatigue, nausea, pain, sleeplessness and stress
DJ- Short Flow	THC	Sativa Dominant	YES									14.01 %	Anxiety, depression, fatigue, lack of appetite, muscle spasms
Dopium	THC	Sativa-Dominant	YES	0.10%	0.10%	0.10 %	0.10 %	0.13%	23.15 %	20.43 %		25.29 %	Anxiety, depression, headaches, migraines,

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Strain Name	Dominant Cannabinoid	Sativa / Indica / Hybrid	Tested	CBD-A	CBD	CBN	CBC	THC	THC-A	Max THC	Max CBD	Total Potency	Symptoms Relieved
		nt Hybrid											muscle spasms, pain and stress
Durban Poison	THC	Sativa	YES	0.10%	0.10%	0.10 %	0.10 %	0.72%	17.92 %	13.81 %		16.45 %	Appetite stimulation, anxiety, depression, nausea, pain and stress
Durga Mata	CBD		N/A										
G.T.H. (Ghost Train Haze)	THC	Sativa	YES									27.69 %	Fatigue and pain
Girl Scout Cookies	THC	Hybrid	YES									21.50 %	Depression, fatigue, stress
Golden Goat	THC	Sativa	YES									19.56 %	Depression, anxiety, stress
Grand Master Kush	THC	Indica	NO										Anxiety, depression, muscle spasms, nausea, sleeplessness, tremors
Gumbo	THC	Indica Dominant	YES	0.10%	0.10%	0.10 %	0.10 %	0.45%	15.80 %	14.31 %		22.27 %	Pain, stress, appetite stimulation, muscle spasms and sleeplessness
Harlequin	CBD	Sativa-Dominant Hybrid	YES	14.33 %	0.10%			0.14%	6.47%	5.81%	12.67 %	21.03 %	Anxiety, muscle spasms, seizures, pain and stress
Hashberry	THC	Indica	YES									19.26 %	Anxiety and stress
HeadBand	THC	Hybrid	YES									22.13 %	Anxiety, hyperactivity, inattentiveness, inflammation, migraines, pain, and seizures
HP-13	THC	Indica	YES									18.09	Anxiety, sleeplessness



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I.S.S.	THC	Sativa	YES									22.13 %	Anxiety and hyperactivity
JA Strain	CBD	Sativa Dominant	NO										Pain, anxiety, muscle spasms, seizures
Jack X HSS	THC	Hybrid	YES									23.34 %	
Jason's Strain	CBD		N/A										
Jorge's Dimonds #1	CBN	Hybrid	NO										Pain control, anti insomnia, anti nausea
King Louie XIII	THC	Indica	YES										Depression, pain, sleeplessness, and stress
LA Confidential	CBN	Indica	YES*									19.24	Anxiety, hyperactivity, lack of appetite, pain, sleeplessness, stress
LA OG	THC	Indica	YES									25.23 %	Depression, lack of appetite, migraines, and pain
Lemon Diesel	THC	Hybrid	YES									17.74 %	Anxiety, depression, lack of appetite, nausea, and stress
Nebula 2	CBD	Hybrid	YES*							6%	7%	13%	High blood pressure, inflammation, migraines, pain and stress
OG 18	THC	Indica-Dominant Hybrid	YES	0.10%	0.10%	0.10 %	0.10 %	0.63%	17.14 %	15.67 %		25.22 %	Pain and lack of appetite
Outer	THC	Sativa-	YES	0.10%	0.10%	0.10	0.10	0.65%	23.17	20.97		22.62	Anxiety, depression,

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Strain Name	Dominant Cannabinoid	Sativa / Indica / Hybrid	Tested	CBD-A	CBD	CBN	CBC	THC	THC-A	Max THC	Max CBD	Total Potency	Symptoms Relieved
Space		Dominant Hybrid				%	%		%	%		%	fatigue, hyperactivity, inattentiveness, irregular bowel movements, migraines, and mood swings
Pain Killer XL	CBD	Indica-Dominant Hybrid	NO										
Platinum Bubba	THC	Indica	NO									11.72 %	Depression, inflammation, lack of appetite, migraines, nausea, pain, sleeplessness, and stress
Pre 98 Bubba Kush	THC	Indica	YES									17.12 %	Anxiety, cramps, hyperactivity, inattentiveness, inflammation, lack of appetite, migraines, sleeplessness and pain
Q 3	THC	Sativa Dominant	YES									24.29 %	Depression, pain, sleeplessness, and stress
Rectangle	THC	Indica	YES									21.12 %	
Reserva Privada	THC	Indica	YES									22.70 %	
S.L.H.	THC	Sativa	YES									16.33 %	Depression, fatigue, nausea, pain and stress
SVF OG	THC	Indica-Dominant Hybrid	YES*	0.00%	0.00%	0.00 %	0.00 %	21.35 %	0.00%	21.35 %		21.35 %	Anxiety, depression, hyperactivity, inattentiveness, migraines, mood swings, nausea, and



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Strain Name	Dominant Cannabinoid	Sativa / Indica / Hybrid	Tested	CBD-A	CBD	CBN	CBC	THC	THC-A	Max THC	Max CBD	Total Potency	Symptoms Relieved
													pain
Tahoe	THC	Indica	YES									19.49 %	Lack of appetite, pain, sleeplessness, and weight loss
The Sister	THC	Indica Dominant	YES									23.26 %	
Ultimate 91	THC	Indica Dominant	YES									21.32 %	Depression, nausea, pain, sleeplessness and stress
Ultimate 91 ChemDawg	THC	Indica-Dominant Hybrid	YES	0.10%	0.10%	0.10 %	0.10 %	0.30%	21.10 %	18.81 %		21.32 %	Depression, nausea, pain, sleeplessness, and stress



5.9 Exhibit 9: Extraction Methodology SOP

5.9.1 Purpose

The creation and development of this procedure has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQulPP) that patients deserve.

HAR Requirement	Description
§11-850-37.a	Each dispensary licensee shall be subject to an annual announced inspection and unlimited unannounced inspections by the department, and inspections by any other government employee or official acting in an official capacity.
§11-850-37.b	A dispensary licensee shall permit entry to the department for the purposes of any inspection.
§11-850-37.c	A dispensary licensee shall give the department access to all parts of the dispensary property, equipment, records, documents, and any other substance material, or information relevant to ensure the dispensary licensee's compliance with this chapter, upon request.
§11-850-37.d	A dispensary licensee shall not refuse to allow inspection at any of its dispensary facilities, and its employees and personnel shall not delay or interfere with any inspection.
§11-850-37.e	Upon completion of the inspection, the department shall provide written notice to the dispensary licensee of its findings and if applicable shall proceed in accordance with subchapter 9. Eff. DEC 14 2015
§11-850-38.a	A dispensary licensee shall submit quarterly reports on January 15, April 15, July 15, and October 15. If the due date for submitting a quarterly report falls on a Saturday, Sunday, or State holiday, the report will be on time if it is submitted on the next day that is not a Saturday, Sunday, or State holiday. Reports shall be submitted on a form and in a manner prescribed by the department.
§11-850-38.b	Reports shall include but not be limited to:
§11-850-38.b.1	Records of entry and exit for all individuals who entered a dispensary facility;
§11-850-38.b.2	Amounts by category of marijuana produced and manufactured marijuana products manufactured and offered for sale;
§11-850-38.b.3	Amounts by category of marijuana and manufactured marijuana products sold.
§11-850-38.b.4	A list of all marijuana, manufactured marijuana products, or unusable marijuana materials that have been destroyed or will be destroyed;
§11-850-38.b.5	A summary financial statement;
§11-850-38.b.6	Laboratory results of all tests conducted;
§11-850-38.b.7	Description of any breach or halt in its security system and tracking system; and
§11-850-38.b.8	Any other information requested by the department. Eff. DEC 14 2015.
§11-850-75.a	A dispensary licensee shall ensure that all marijuana and manufactured marijuana products it dispenses are safe for use or consumption by qualifying patients.
§11-850-75.b	A dispensary licensee shall comply with State and county health, safety, and sanitation regulations and may be subject to inspection to confirm that no health or safety concerns are present which may contaminate the products.
§11-850-75.c	Any person who has or appears to have an illness, or open lesion including boils, sores, or infected wounds, or any other source of contamination, shall be excluded from any contact with a dispensary's marijuana or manufactured marijuana products until the condition is corrected.
§11-850-75.d	A dispensary shall have hand washing facilities that are adequate and convenient, furnished with running water, and provide effective hand cleaning and sanitizing preparations.
§11-850-75.e	All persons working in direct contact with marijuana and manufactured marijuana products shall conform to hygienic practices while on duty, including but not limited to:
§11-850-75.e.1	Maintaining adequate personal cleanliness; and
§11-850-75.e.2	Washing hands thoroughly in an adequate hand washing area before starting work and at any other time when the hands may have become soiled or contaminated.
§11-850-75.f	A dispensary licensee shall ensure that all litter and waste are properly removed and the operating systems for waste disposal are maintained in an adequate manner so that they do not constitute a source of contamination in areas where marijuana or manufactured marijuana products are exposed.
§11-850-75.g	The floors, walls, and ceilings of a dispensary facility shall be constructed in such a manner that they may be



HAR Requirement	Description
	adequately cleaned and kept clean and in good repair.
§11-850-75.h	The dispensary licensee shall ensure that there is adequate lighting in all areas where marijuana or manufactured marijuana products are stored or sold, and where equipment or utensils are cleaned.
§11-850-75.i	The dispensary licensee shall provide adequate screening or other protection against the entry of pests and shall dispose of rubbish to minimize the development of odor and the potential for waste to become an attractant, harborage, or breeding place for pests.
§11-850-75.j	The dispensary licensee shall not allow animals in dispensary facilities, except for service animals in accordance with section 347-2.5, HRS.
§11-850-75.k	The dispensary licensee shall maintain buildings, fixtures and other facilities in a sanitary condition.
§11-850-75.l	The dispensary licensee shall use and maintain any toxic cleaning compounds, sanitizing employees, and pest control measure such as bait traps, in a manner that protects against contamination of marijuana or manufactured marijuana products and in a manner that is in accordance with any applicable local, state, or federal law, rule, regulation or ordinance.
§11-850-75.m	A dispensary licensee shall not alter marijuana or manufactured marijuana products to change their appearance, flavor, or smell in a way that would appeal to minors.
§11-850-81	A dispensary licensee shall not dispense marijuana or manufactured marijuana products unless a laboratory certified by the department pursuant to this chapter has tested the marijuana and manufactured marijuana products and they meet the requirements set out in this chapter. Eff. DEC 14 2015

5.9.2 Local Compliance

In accordance with the requirements defined by Hawai'i Administrative Rules Chapter(s): 11-850-37, 11-850-38, 11-850-75, 11-850-81 and enforced by the Hawai'i DOH, Hale O Lahuli has developed a Quality Management System that assures each step in our manufacturing and distribution processes is carefully performed and controlled. Hale O Lahuli quality assurance and control activities relating to controlled substance manufacturing will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-37, §11-850-38, §11-850-75 and §11-850-81.

5.9.3 Extraction Methods Overview

Hale O Lahuli will extract cannabinoids from mature marijuana flower using the three extraction methods and solvents outlined below. Because cannabinoids are not water soluble, cannabinoids must be dissolved in a solvent to allow extraction. Hale O Lahuli will only utilize marijuana by-product of acceptable quality in the production of marijuana concentrates and infused products. Marijuana concentrates will be available to Retail Dispensary customers in ready-to-use form as well as infused in further processed products. All marijuana and manufactured marijuana products shall pass laboratory analysis prior to entering the Retail Dispensary supply chain.

5.9.3.1 Extraction Methodology

Three extraction methods will be employed by Hale O Lahuli:

1. Ice-water separation:

- Cannabinoids can be extracted by using purified water and ice in food-grade agitation equipment to separate resin glands from plant material;
- Processed marijuana may undergo additional processing to mitigate low yields from water extraction; and



- c. This water-based, solvent-less process results in residue-free marijuana concentrate.
2. Butane extraction:
 - a. Butane solvent in an ASME certified closed loop system and purged via vacuum oven;
 - b. Retains high level of compounds and terpenes;
 - c. Results in high quality oil from lower grade by-product; and
 - d. Allows for some ability to selectively extract targeted compounds allowing targeted products.
3. Supercritical fluid CO2 extraction:
 - a. CO2 used as a solvent in an ASME certified closed loop system to extract cannabinoids and terpenes;
 - b. Extracts chemical compounds using carbon dioxide in its supercritical state instead of hydrocarbon-based solvents;
 - c. CO2 is an excellent solvent because it is nontoxic, nonflammable, and compatible with compounds that are temperature-sensitive. The relatively low temperature of the process and the stability of CO2 permits most cannabinoids to be extracted with little damage or denaturing;
 - d. By manipulating the temperature and pressure of the fluid, the extractor can solubilize the chemical compounds of interest and selectively extract them. This provides the ability to selectively extract targeted cannabinoids and terpenes, allowing for targeted products;
 - e. Though this method produces extract with little or no residual solvent, the extracted product is purged via vacuum oven to remove any potential residual solvent;
 - f. Vapors produced during the purging process are collected, managed and vented to atmosphere; and
 - g. After extraction, the CO2 can be recycled for further extraction use.

5.9.3.2 CO2 Extraction

Hale O Laulima will create a variety of marijuana products with various routes of administration using decarboxylated extract as the source marijuana product input. CO2 will be the preferred solvent used for extraction processes due to its benign nature, and the resulting extract, after decarboxylation, will be the marijuana material incorporated into all finished marijuana products. By using the supercritical fluid extraction ("SFE") machine detailed in Hygiene, Sanitation and Facility Requirements SOP, and applying the right amount of pressure, temperature and time, the supercritical CO2 will selectively extract targeted compounds from the marijuana plant and collect the essential cannabinoids and terpenes needed to produce Hale O Laulima's specialized line of marijuana products. The Production facilities will request internal and independent testing of each finished production lot, and confirm the identity, purity, potency and safety profile of each product created in accordance with the product specifications, as described in the Inventory Control and Management SOP as well as the Quality Assurance and Quality Control SOP. Lots are carefully tracked, labeled, and packaged in



accordance with state laws and regulations, Hale O Laulima policies, industry best practices, and any additional requirements set forth by the Department. See the Inventory Control and Management SOP for more information about marijuana product tracking, labeling, and packaging.

The Medical Director and Laboratory Director will consult with the Production Manager about new developments in processes or procedures regarding the CO₂ extraction process. The Production Manager will review quality control, safety and emergency procedures, sanitary conditions and cleanliness and environmental controls prior to beginning production procedures at the Production facility. The Production Manager will also ensure that all products are properly labeled at all times, and packaged properly prior to being placed in storage or transported to the Retail Dispensary Facilities.

5.9.3.3 Butane Extraction

Following the SOPs submitted with this application, Hale O Laulima intends to safely produce high quality marijuana concentrate through the method of using butane and a closed-loop extraction system to extract cannabinoids.

Butane is used for a wide variety of purposes ranging from cooking to cleaning and is a premier solvent for plant-based extractions. It is used to extract caffeine, aloe vera, and vanilla. Industries choose butane due to its unique, non-polar selectivity and low-boiling point (which makes it easier to remove from the finished product.) The FDA has listed it among the “food-safe solvents”. According to the Food and Drug Administration, the generally accepted consumption rate for butane is approximately 50mg/day, which equates to approximately 5000 ppm or 0.5%. According to the Occupational Safety and Health Administration (OSHA), the permissible exposure limit for butane is 800 ppm over an eight-hour workday. Proper operation of a closed loop extraction system will keep exposure far below both of these permissible limits.

Butane is used by the marijuana industry to extraction the essential cannabinoids and terpenes from the marijuana plant into a clean, effective medicine. The selectivity of butane allows for the maximum retention of these medicinal benefits while leaving behind unwanted carbons found in the plant material. Many edible and topical marijuana product manufacturers have converted to using butane extracted marijuana oil as the active ingredient in their products rather than raw plant material because it easier to accurately measure dosing and limits the marijuana flavor. Additionally, many marijuana users have moved from burning raw plant material and have begun vaporizing extractions exclusively.

5.9.3.4 Ice Water Extraction

Ice water extraction is by far the safest method for separating trichomes, which contain therapeutic cannabinoids and terpenes, from marijuana plant material in order to obtain only the resin. As resin glands possess greater density than water and trichomes become brittle at



low temperatures, ice water and agitation are all that is needed to separate the desired resinous material from the plant material.

In this process, marijuana plant material is placed in a mesh bag which is agitated in ice water, which separates trichomes from the plant material. Due to the density and size of the trichomes, they will pass through the holes in the mesh and sink to the bottom of the container. After passing the material through a series of mesh bags, filtering the solid content from the water used throughout the process, and pressing the resulting product to remove excess moisture, the result is pure, solvent-free marijuana resin, or hashish.



5.10 Exhibit 10: Marketing and Advertising SOP

5.4.3 Purpose

The creation and development of this procedure has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQuIPP) that patients deserve.

HAR Requirement	Description
§11-850-8.a	A person shall not be granted more than one dispensary license.
§11-850-8.b	A dispensary license shall not be sold or otherwise transferred from one person to another person.
§11-850-8.c	A dispensary facility shall not be permitted within seven hundred fifty feet of the real property comprising a playground, public housing project or complex, or school. Eff. DEC 14 2015
§11-850-93.a	A dispensary licensee shall not engage in advertising in any media including but not limited to:
§11-850-93.a.1	Broadcast or electronic media:
§11-850-93.a.1.A	Radio;
§11-850-93.a.1.B	Television;
§11-850-93.a.1.C	Internet; and
§11-850-93.a.1.D	Social media;
§11-850-93.a.2	Print media:
§11-850-93.a.2.A	Newspaper;
§11-850-93.a.2.B	Magazine;
§11-850-93.a.2.C	Billboards; and
§11-850-93.a.2.D	Placards on public transit vehicles or public transit shelters; provided that the dispensary licensee may establish a website that provides only general information on the dispensary licensee's contact information, its retail dispensing location, and a list of products available for dispensing with a description limited to the information specified in section 11-850-92
§11-850-93.b	A dispensary licensee shall not display marijuana or manufactured marijuana products in windows or in public view. Eff DEC 14 2015

5.4.4 Local Compliance

In accordance with the requirements defined by Hawai'i Administrative Rules Chapter(s): 11-850-8, 11-850-93 and enforced by the Hawai'i DOH, Hale O Laulima will not engage in advertising in any media or display marijuana in any form to public view. Allowable forms of public notification regarding Hale O Laulima facilities and products is limited to what is defined in 11-850-93.a.2.D. The content of Hale O Laulima's product label is an acceptable means of describing the products in Hale O Laulima's product portfolio. All Hale O Laulima activities relating to advertising and prohibited displays will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-8 and §11-850-93.

5.4.5 Definitions and Abbreviations:

Air-Conditioning ("A/C")

American National Standards Institute ("ANSI")

American Society for Testing and Materials ("ASTM")

Automated Data Processing/Point-of-Sale System ("ADP/POS")



Batch Production Record ("BPR")
BBC Research & Consulting ("BBC")
Board of Directors ("the Board")
Cannabidiol ("CBD")
Cannabidiolic Acid ("CBDA")
Cannabigerol ("CBG")
Chief Executive Officer ("CEO")
Chief Operations Officer ("COO")
Code of Federal Regulations ("CFR")
Community Right to Know Act ("EPCRA")
Compassionate Use Registry ("the Registry")
Conditionally Exempt Small Quantity Generator ("CESQG")
Continuing Medical Education (CME)
Critical Process Parameter ("CPP")
Current Good Manufacturing Practices ("cGMP")
Denver Relief Consulting ("DRC")
Department of Health ("DOH")
Electro-Conductivity ("EC")
Environmental Health Agency ("EHA")
Equal Employment Opportunity Commission ("EEOC")
Equipment Testing Laboratory ("ETL")
Executive Management Team ("EMT")
Executive Vice President ("EVP")
Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA")
Global Positioning System ("GPS")
Good Agricultural Practices ("GAP")
Good Handling Practices ("GHP")
Hale O Lahilima ("HOL")
Hawai'i Administrative Rules ("HAR")
Hawai'i Medical Use of Marijuana Act ("the ACT")
Hazard Communication Standard ("HCS")
Health Insurance Portability Accountability Act ("HIPAA")
Health Savings Account ("HSA")
High Efficiency Particulate Arrestance (HEPA)
Immediately Dangerous to Life or Health ("IDLH")
Integrated Pest Management ("IPM")
International Fire Code ("IFC")
International Organization for Standardization ("ISO")
Master Batch Record ("MBR")
Masters in Business Administration ("MBA")
National Institute for Occupational Safety and Health ("NIOSH")
National Type Evaluation Program ("NTEP")
Occupational Safety and Health Administration ("OSHA")



Oxidation Reduction Potential ("ORP")
Personal Protective Equipment ("PPE")
Photosynthetically Active Radiation ("PAR")
Quality Assurance ("QA")
Quality Control ("QC")
Quality Control Team ("QCT")
Quality Control Unit ("QCU")
Quality Management System ("QMS")
Reverse Osmosis ("RO")
Safety Committee ("the Committee")
Safety Data Sheets ("SDS")
Safety, Quality, Identity, Purity, and Potency ("SQuIPP")
Self-Contained Breathing Apparatus Type Respirators ("SCBA's")
Standard Operating Procedure ("SOP")
Superfund Amendments Reauthorization Act ("SARA")
Tetrahydrocannabinol ("THC")
Tetrahydrocannabinol Acid ("THCA")
Total Dissolved Solids ("TDS")
Ultra-Violet ("UV")
United States Environmental Protection Agency ("EPA")
United States Food and Drug Administration ("FDA")
Worker Protection Standard ("WPS")
World Health Organization - Uppsala Monitoring Center ("WHO-UMC")

5.4.6 Outreach and Education Practices

In accordance with Hawai'i Administrative Rules Chapter(s): §11-850-93 Hale O Laulima will not engage in advertising in any media including but not limited to broadcast or electronic media (radio, television, internet, social media) and print media (newspaper, magazines, billboards and placards on public transit vehicles or public transit shelters). Hale O Laulima will establish and maintain a website that provides only general information regarding Hale O Laulima's contact information, location and a list of products available for dispensing including a description of each, which is limited to their contents and potency as set forth in Hawai'i Administrative Rules Chapter(s): §11-850-92.

Due to these limitations, Hale O Laulima will engage in opportunities to promote awareness for Hale O Laulima and the medical marijuana program at-large in a respectful and professional manner through a series of education events, including (1) the coordination of Continuing Medical Education (CME) seminars to educate doctors and other health professionals on the therapeutic benefits of medical marijuana and its various product types, ingestion methods and potential side effects; (2) general public education and community integration events meant to raise awareness of company, its mission and product offerings and to alleviate community concerns with regard to the medical marijuana program; and (3) other community outreach and integration efforts for the purposes of developing and sustaining healthy relationships with



members of the community in order to further the re-education of public perceptions of medical marijuana use, patients and to maintain a respectable operational status.

Community outreach and integration efforts are critical components of successful medical marijuana business development. Effective community integration planning is a continuous process that involves ongoing revisions and improvements. It is essential for Hale O Lahuli to form and sustain healthy relationships with members of their communities in order to further the re-education of public perceptions of medical marijuana use, patients and to maintain a respectable operational status. Hale O Lahuli will engage in best practices to aid patient health and substantially improve the welfare of the community in which we operate. It is the principal goal of Hale O Lahuli to develop a reputable medical marijuana establishment in Hawai'i and maintain operations as an upstanding corporate citizen and firmly rooted community leader. Hale O Lahuli is committed to reforming public perception of medical marijuana use and will provide all necessary measures to respect the comfort and dignity of our patient-based clientele. Remedial plans will be developed in response to targeted service deficiencies in our surrounding community, as our evolving charitable efforts and contributions will be further expanded with concern for those needs unique to our diverse neighboring residents and businesses.

In order to ensure the effectiveness of our projected Community Impact Plan, additional measures will be developed for increased range of involvement in outreach and improvement efforts. Hale O Lahuli has initiated preliminary integration efforts by identifying gaps in localized resources and engaging in progressive relationship-building conversations with municipal authorities, residents and businesses. Hale O Lahuli will engage in productive community relationship-building efforts throughout the initial business development process and proceed to strengthen its network of employees, patients, caregivers, vendors, neighbors, and local business associations as a continuous business practice. Community integration measures, in addition to those detailed below, will be developed as new opportunities or amendable community service deficiencies in the community are identified.

In order to facilitate the implementation of the Community Impact Plan, Hale O Lahuli's Community Outreach Director will develop a strategic timeline containing a projected schedule of service events and available information concerning the initiation of those measures with potential for immediate application. At a minimum, initial efforts to expedite the actionable community services, events, networking measures, and charitable contributions will be launched within the first year of Hale O Lahuli being awarded a dispensary license.

Hale O Lahuli is committed to removing negative stigmas associated with the establishment of seemingly private or mysterious medical marijuana dispensary facilities within existing communities. As part of the Hale O Lahuli commitment to the betterment of the community, Hale O Lahuli will engage with local groups to identify and reeducate pressing public concerns and deficiencies. Prior to the first day of dispensary operation, Hale O Lahuli will host an open-house style event for members of the community and the immediate surrounding



neighborhood. By opening retail facility doors to those who live and work in the neighborhood, Hale O Laulima will educate concerned community members on how the dispensary will operate and welcome the opportunity to answer their questions with direct responses from dispensary owners and operators. Fostering this culture of transparency during the inaugural stages of dispensary operation will help Hale O Laulima establish a welcoming reputation and correct any residual misconceptions stemming from outdated misinformation.

Hale O Laulima is committed to building a professional reputation among local merchants and maintaining strong relationships with small businesses in the community. During the process of initially establishing Hale O Laulima, efforts will be pursued to engage with local and neighborhood merchants' associations. Membership with such associations will be maintained as a vital component of the operational practices of Hale O Laulima, including attendance at regular meetings and adherence to any and all applicable mandatory participation requirements. Hale O Laulima will provide the same effort directed at local neighborhood associations.

Hale O Laulima understands the complexity of legal and regulatory requirements that shape the environment in which state-legal medical marijuana businesses currently operate. Hale O Laulima embraces its duties to all active stakeholders, including patient and caregivers, the community, the State of Hawai'i, and all other medical marijuana industry operators comparably committed to best practices. Hale O Laulima will actively participate as members in cooperative campaigns with other reputable businesses and established trade groups, including the National Marijuana Industry Association, Americans for Safe Access, and the American Herbal Products Association.

5.4.7 Patient Direct Messaging Policy

Through the procedural development of comprehensive patient intake paperwork, Hale O Laulima will provide qualifying patients with adequate educational materials that effectively communicate the public mission of Hale O Laulima as a marijuana establishment committed to patient, product and public safety and wellness above all else. Confidential consumer direct communication methods allow Hale O Laulima to track responses of existing patients and afford the opportunity for Hale O Laulima to monitor outreach effectiveness while encouraging patient feedback regarding dispensary services and product offerings. Dispensary intake materials will also serve to compel vital information from patients regarding prior product effectiveness and personal preferences that will inform and help shape the evolving public perception of Hale O Laulima as a progressive and professional medical marijuana dispensary operation.

Information pertaining to medically toned product development, progressive patient services, and patient feedback will be made available to all patients of Hale O Laulima as revelations come to light. Through dedicated messaging focused on the promotion of patient and community wellness above all else, Hale O Laulima will elevate public perceptions and understandings of marijuana as medicine. Hale O Laulima will work to develop a dispensary



community culture built from return clients and word of mouth. Hale O Laulima marketing is most concerned with the effectiveness of internal program messaging, in opposition to advertising and unethically incentivized new patient recruitment.

Hale O Laulima's website presence will provide round-the-clock public access to credible information pertaining to the medical use of marijuana, dispensary product offerings, emerging research regarding the treatment of specific conditions using marijuana and other relevant educational materials. The following standard operating policies and procedures serve as guidelines for the implementation of patient direct outreach techniques in compliance with state regulations and the ratification of a company-wide code of conduct for refined outreach communications.

5.4.8 Dispensing Organization Logo

The Board Of Directors ("the Board") and the Hawai'i DOH, if required, must approve any image used as a Production or Retail Dispensary logo. The Board must approve any printed logo to ensure appropriateness, professionalism, and consistency of use.

5.4.9 Advertising Practices

Hale O Laulima's Director of Community Relations will ensure all awareness and educational outreach materials will be approved by the Hawai'i DOH prior to public presentation, when required. Hale O Laulima will engage in advertising practices that promote Hale O Laulima and the medical marijuana program in a respectful, educational, and professional manner. Hale O Laulima realizes the potentially harmful effects of smoking and will emphasize alternative, medically-toned products and methods of consumption, including, but not limited to capsules, lozenges, pills, oils, tinctures and topical products.

Hale O Laulima is committed to preventing diversion to minors and will add age safeguards on all websites to deter under-age access. Hale O Laulima believes it is important to provide easy access to Hale O Laulima information, regulatory updates, industry and research advancements, and community integration events for all patients. For this reason, Hale O Laulima will produce newsletters and maintain a resource blog to ensure easy access to this information.

Hale O Laulima will post an accurate and intuitive menu with helpful information about the products available such as cannabinoid profile, constituent content, dosing recommendations and nutritional information. Hale O Laulima expects the highest volume of web traffic to be confined to the secure online menu, as patients will often check menus for availability of preferred products prior to visiting the dispensary retail facility. Hale O Laulima's menu will be updated by employees immediately as needed in order to reflect the current availability of all products. Pursuant to applicable laws and regulations, the prices of marijuana and marijuana products will never be advertised on the public website, but will instead be available on the secure website or printed menus located inside the facility for qualified patients only.



5.4.10 Public Price Listings Prohibited

It is Hale O Lahuli policy that product pricing will never be advertised publicly, including on the website, but will be available only on the secure website or on printed menus located inside the facility, which are available to qualified patients and patient legal representatives only.

5.4.11 Prohibited Activities

All outreach and education efforts internal to patients and external to the general public shall be compliant with all State-sanctioned regulations. Hale O Lahuli prohibits:

4. Advertisement of marijuana or a marijuana product in any form or through any medium:
 - a. Within 750 feet of the perimeter of a school grounds, playground, recreation center or facility, child care center, public park or library, or any game arcade whose admission is not restricted to persons aged 21 or older;
 - b. On or in a public transit vehicle or public transit shelter; or
 - c. On or in a publicly-owned or –operated property.
5. Any statement, design, representation, picture, or illustration that encourages or represents the use of marijuana;
6. Any statement, design, representation, picture, or illustration that encourages or represents the recreational use of marijuana;
7. Any statement, design, representation, picture, or illustration related to the safety or efficacy of marijuana unless supported by substantial evidence or substantial clinical data with reasonable scientific rigor, which shall be made available upon the request of a registrant or the Hawai'i DOH;
8. Any statement, design, representation, picture, or illustration portraying anyone under 18 years of age;
9. Any advertisement that utilizes results from an independent testing laboratory or other laboratory to promote any other attributes of marijuana or a marijuana product; and
10. Allowing a physician to advertise at the dispensary.

5.4.12 External Signage

External signage will only display the registered company name and address in order to assist patients in locating Hale O Lahuli retail facilities. Separate production facilities will not display Hale O Lahuli name associated with the retail dispensary facilities. A phone number and website shall also be displayed to provide a resource for patients to obtain additional information about Hale O Lahuli. Hale O Lahuli will ensure that all distributable marijuana and associated marijuana products are not visible to persons from the exterior of the facility. All external signage will be maintained in compliance with applicable State and city laws and regulations.



5.4.13 Printed Materials and Flyers

Hale O Lahuli will use printed educational materials to promote health and wellness services offered at Hale O Lahuli retail facilities, as well as products available and the associated benefits of select medically toned products. Educational materials provided by Hale O Lahuli will include information describing proper dosage and titration for different methods of consumption as they relate to qualifying conditions. Information collected from registered testing facilities and peer-reviewed scientific journals will be provided to assist patients in learning about cannabinoids and terpenes and their associated benefits. Hale O Lahuli will describe the impact and potency of different products, and will emphasize in all recommendations that the smallest amount possible should be tested initially and increased conservatively until the consumer achieves the desired effect of consumption. All educational materials provided digitally and at the Hale O Lahuli facility will comply with applicable laws and regulations.

Bio-assessment sheets will be provided for patients during dispensary visits and also be available digitally on Hale O Lahuli website. Patients will be encouraged to record valuable information detailing their experiences using different marijuana strains, products and ingestion methods, as well as the variegated effects of different strains and marijuana products used to treat a wide range of ailments and conditions. Employees will collect and catalogue strain and product-specific data provided by patients and use this information to assist with condition-specific recommendations and strain and marijuana product descriptions to be published through approved company outlets.

5.4.14 Digital Marketing

Hale O Lahuli will provide a website, patient-direct email newsletters and text-message updates, and a resource/news blog for qualifying patients and legal representatives. The website will provide basic information to assist patients in contacting and learning about Hale O Lahuli, information about company and program policies, hours of operation, contact information, general information on the legal status of medical marijuana, legal information for registered patients and patient legal representatives, and an accurate menu, updated multiple times daily, with helpful information about available products, including product test results, dosing recommendations, and nutritional information. The website will have a public area, which provides only basic information about Hale O Lahuli and a secure website area available only to registered qualifying patients or patient legal representatives, which will provide access to detailed information on products. Hale O Lahuli desires to create a website that is a leading educational resource for medical marijuana education in the state of Hawai'i.

Patient direct email newsletters and text-message updates will be distributed on a regular basis to provide existing patients with updated information pertaining to Hale O Lahuli policies and procedures, upcoming products, event calendars, product recall and withdrawal notices and other approved communications. Data provided through patient intake forms allows patients to designate products and services tailored to their needs, giving Hale O Lahuli the ability to supply patients with targeted information relevant to individualized needs and preferences.



5.4.15 Virtual Services

Hale O Lahuli will utilize digital patient management software tailored to help company retail employees better manage business and patient relations. Patients will be consulted on the use of virtual product review and ordering services offered through Hale O Lahuli website and leading digital patient management services offered by CannaBuild. Hale O Lahuli will establish and maintain an account with CannaBuild, a web-based service and smartphone application that allows patients to access specific information about medicinal marijuana as it applies to their personal treatment preferences. The digital services that will be offered through Hale O Lahuli's CannaBuild account will provide patients with the ability to discreetly review products from home and locations outside of the dispensary. For new patients who might be intimidated by the prospect of entering a retail medical marijuana establishment, CannaBuild delivers pointed information to provide such individuals with a sense of which products could best suit their needs prior to stepping foot in the store.

CannaBuild also allows patient-users to consult directly with a qualified company employee regarding questions relating to symptoms and product offerings as they arise. The intuitive, easy-to-use program aids an industry-wide best practice effort to encourage comprehensive patient education and maintenance of personal records for sustained effective medicine choices. CannaBuild fosters the most efficient patient management practices and patient informational services currently available to both new and established medical marijuana businesses. Additional CannaBuild features of benefit to Hale O Lahuli include tools to track revenue, customer trends, product purchase statistics, and web traffic.

5.4.16 Social Media

Social media platforms including Facebook, Twitter, and Instagram will NOT be used by Hale O Lahuli as they are prohibited by Hawai'i Administrative Rules Chapter(s): §11-850-93.

5.4.17 Promotion of Community Involvement and Company Events

Hale O Lahuli will additionally use printed materials to promote community integration and service events and provide event information for volunteers. Hale O Lahuli will organize service events for community gardening, bicycle and wheelchair repair clinics, clothing, food and hygiene product collection drives, trash pick-up services after public events and routine neighborhood cleanup efforts as a regular part of the Hale O Lahuli community outreach and involvement. Hale O Lahuli realizes that many patients are burdened with economic misfortune and it is important to ensure access to the marijuana strains or products that will benefit these patients the most. Hale O Lahuli will develop a financial assistance program and distribute related outreach materials to provide information about program details and qualifications for indigent or low-income patients.



5.4.17.1 Company Promotion Through Community Involvement

Hale O Lahuli will maintain a philanthropic public image in part by bridging socioeconomic gaps between community service organizations, local merchants associations, corporate sponsors and investors. Hale O Lahuli will host educational seminars for patients and the community as part of efforts to establish a positive social image and redefine negative stigmas associated with the sale and use of medical marijuana. Hale O Lahuli will establish itself as a member of local merchants and neighborhood associations as part of an effort to promote Hale O Lahuli as a dedicated community member concerned with the overall wellbeing and small-business economy of the local area. Hale O Lahuli will additionally serve as a member of applicable local neighborhood watch groups.

5.4.17.2 Company Promotion Through Events

Hale O Lahuli will regularly host fundraisers to raise awareness for the organizations Hale O Lahuli has designated to receive charitable donations. The fundraising capacity of Hale O Lahuli will strengthen the development of community relations and the ability of Hale O Lahuli to recruit additional organizations and corporate sponsors. By energizing planned giving programs inspired by the passions of Hale O Lahuli employees and the service needs of the community, Hale O Lahuli will translate donor loyalty into targeted fundraising actions that lend to the professionalization of the medical marijuana industry and public perceptions of medical marijuana.



5.11 Exhibit 11: Patient Legal Information -Hawai'i

5.11.1.1 Patient Legal Information

Hale O Lahuli ("HOL") is committed to providing patients with the most accurate and up-to-date legal information pertaining to medical marijuana. Our training program includes extensive compliance-related education for staff in order to provide patients with a trusted source of information in person, online, and over the phone. The New Patient Packet and Patient Legal Information Packet provide patients with pertinent information in written form. The Dispensary Manager must update these documents at least bi-annually. As pertinent laws and regulations change, the documents will be updated more frequently as needed.

DISCLAIMERS:

The information contained herein and any information provided by agents of HOL are not to be construed as legal advice. Laws and regulations are subject to change; as such, the following information is time-sensitive and requires periodic review and update. HOL strives to keep legal and regulatory overviews up-to-date for the benefit of the medical marijuana community but maintains that it is ultimately the responsibility of a patient or caregiver to maintain compliance with all applicable laws and regulations.

CONTACTS:

If you have questions regarding law and regulations, we recommend consulting with the DISPENSARY MANAGER and contacting the Hawai'i DOH:

Natalie M. LaPrade Maryland Medical Cannabis Commission

4201 Patterson Avenue

Baltimore, MD 21215

dhmh.medicalmarijuana@maryland.gov



5.11.1.2 Hawai'i Laws and Regulations Applicable To Patients

Qualifying Patient

In Hawai'i, a qualifying patient is an individual who:

1. Lives in the State, or, during that time an individual is present in the State, is physically present in the State of the purpose of receiving medical care from a medical facility in the State;
2. Has been provided with a written certification by a certifying physician in accordance with a bona fide physician-patient relationship; and
3. If younger than 18 years old, has a caregiver, which is the patient's parent or legal guardian who is over 21 years of age and has agreed to assist with the qualifying patient's medical use of marijuana.

How to Become a Legal Medical Cannabis Patient

In order to become a medical marijuana patient in Hawai'i, a patient must:

1. Register with the Hawai'i DOH; and
2. Obtain a written certification from a Hawai'i licensed physician who has registered with the Hawai'i DOH.

NOTE: The Hawai'i will not provide a list of registered certifying physicians.

Patient Registration

The Hawai'i DOH will establish a registry of qualifying patients and their caregivers. A patient must register with the Commission by:

1. Logging on to the Commission website;
2. Providing full legal name, address, date of birth; and
3. Uploading an image of a government identification document to establish identity.

5.11.1.3 Obtaining a Written Certification and Criteria for Bona Fide Physician-Patient Relationship

A patient then needs an in-person visit with a registered physician to obtain a written certification for medical marijuana. There must be a bona fide physician-patient relationship in order for a written certification to be issued and a patient may only have one certifying physician at a time.

In this context, a bona fide physician-patient relationship means a treatment or counseling relationship between a physician and patient in which the physician has:

1. Reviewed the patient's relevant medical records and completed an in-person assessment of the patient's medical history and current medical condition;
2. Created and maintained records of the patient's condition in accord with medically accepted standards; and
3. A reasonable expectation that the physician will monitor the progress of the patient while using medical marijuana and take any medically indicated action:
 - a. To provide follow-up care to the patient;



- b. Regarding the efficacy of the use of medical marijuana as a treatment for the patient's severe or debilitating medical condition;
- c. Regarding any adverse event associated with the use of medical Marijuana.

If the patient meets the physician's criteria for treatment with medical marijuana, the physician will:

1. Log on to the Hawai'i DOH's website and transmit the written certification with all required information to the Hawai'i DOH;
 - a. The written certification will contain the following information about the patient:
 - i. Name;
 - ii. Date of birth;
 - iii. Address and country of residency;
 - iv. Qualifying medical condition; and
 - v. Date of qualification;
2. If determined to be appropriate, include in the written certification a written statement certifying that the physician is of the opinion that the standard 30-day supply of medical marijuana would be inadequate to meet the patient's medical needs; and
3. If requested, provide a copy of the written certification to the qualifying patient.

5.11.1.4 Qualifying Conditions

A qualifying patient shall be eligible to seek registration and pursue a written certification if diagnosed as having one or more qualifying medical conditions. A patient is eligible for registration if the patient:

1. Has been admitted into hospice or is receiving palliative care for a chronic or debilitating disease or medical condition;
2. Has a chronic or debilitating disease or medical condition or is receiving treatment for a chronic or debilitating disease or medical condition that causes:
 - a. Cachexia;
 - b. Anorexia;
 - c. Wasting syndrome;
 - d. Severe or chronic pain;
 - e. Severe nausea;
 - f. Seizures; or
 - g. Severe or persistent muscle spasms;
3. Has the following diseases or conditions:
 - a. Glaucoma; or
 - b. Post traumatic stress disorder.

NOTE: A physician, at his or her discretion, may also issue a written certification for any condition that is severe, for which other medical treatments have been ineffective, and if the symptoms reasonably can be expected to be relieved by the medical use of marijuana.

Petition to Add Conditions



Residents may petition the Hawai'i DOH to add debilitating medical conditions to the approved list. The Hawai'i DOH will accept petitions and conduct a public hearing at least once per year, if needed. The Hawai'i DOH shall consider a petition that may include:

1. The severity of a condition or the treatments;
2. The degree to which other medical treatments have been ineffective to alleviate pain, suffering, disability or the symptoms of the condition or the treatment;
3. Evidence that supports a finding that the use of medical marijuana alleviates the pain, suffering, disability, or symptoms of the condition or treatment;
4. Any information or studies regarding any beneficial or adverse effects from the use of medical marijuana in patients with the medical condition, medical treatment, or disease; and
5. Letter of support from physicians or other licensed health care professionals knowledgeable about the condition, treatment, or disease.

The Hawai'i DOH may, in addition to the information provided in a petition, examine scientific, medical, or other evidence and research pertaining to the petition and gather information in-person or in writing from other knowledgeable persons.

Patient Identification Card

It is required for all qualifying patients to be registered and issued a written certification on the Hawai'i DOH's Registry, however qualifying patients are not required to obtain a physical patient identification card. A patient ID card is entirely optional and will cost \$50. A patient may request a patient ID card when he or she receives the written certification or the patient may apply for an ID card at a later date.

Time Constraints

Patients must obtain medical marijuana within 120 days of issuance of a written certification or it will be invalidated.

Obtaining Medicine

Medical marijuana patients in Hawai'i must obtain their medicine from a licensed dispensary. A licensed dispensary is an entity licensed by the Hawai'i DOH that acquires, possesses, repackages, processes, transfers, transports, sells, distributes, or dispenses, products containing medical marijuana, related supplies, and related products including tinctures, aerosols, oils, or ointments, or educational materials for use by a qualifying patient or caregiver.

5.11.1.5 Purchase and Possession Limits

Licensed dispensaries are limited in the amount of medical marijuana they can sell to registered patients, just as patients are limited in the amount of medical marijuana they can legally possess during a given time period. The Hawai'i DOH regulations limit the amount of medical marijuana that can be dispensed to a patient within a 30-day period; this limit is referred to as a "30-day supply." A patient may possess no more than a 30-day supply of medical marijuana at any given time. A patient may, in a 30-day period, obtain up to:

1. 120 grams of usable marijuana (i.e., dried marijuana flower, or "bud"); or



2. 36 grams of Δ^9 -Tetrahydrocannabinol ("THC") in the case of a medical marijuana infused product or concentrate.

NOTE: If the patient's certifying physician determines the above amounts would be inadequate to meet the medical needs of the qualifying patient, the certifying physician may include a written statement stating so in the patient's written certification. In this case, the certifying physician would establish a higher 30-day supply for the patient, which would allow the dispensary to dispense that specified higher amount of medical marijuana to the patient during a 30-day period and would allow the patient to possess up to that amount at any given time.

5.11.1.6 Registering a Primary Caregiver

"Caregiver" means an individual 21 years old or older designated by a patient who has agreed to assist with a qualifying patient's medical use of medical marijuana. For a qualifying patient younger than 18 years old, caregiver means a parent or legal guardian. In simple terms, a caregiver is a person who meets the above criteria that a patient has designated to help with his or her medical marijuana treatment, which may include acquisition, transportation, and administration of the patient's medical marijuana. Caregivers are often responsible for obtaining marijuana from a dispensary for a patient under their care whose access to medical marijuana could otherwise be limited due to physical mobility or severe illness.

Medical marijuana patients in Hawai'i have the option of designating one primary caregiver to assist them in the acquisition of medical marijuana. It is established that a qualifying patient may have no more than two caregivers at one time and a caregiver may serve as caregiver for no more than five qualifying patients at one time.

Hawai'i regulations require that your caregiver must be at least 21 years old and be officially designated as your primary caregiver through processes outlined in state regulations, which are summarized below:

1. A registered patient may log onto the Hawai'i DOH website to designate a caregiver;
2. Once designated by a patient, a caregiver must register with the Hawai'i DOH by logging on to the Hawai'i DOH website and submitting:
 - a. The name and other details of the qualifying patient for whom the caregiver is providing assistance OR is the parent of legal guardian;
 - b. Proof that the caregiver is authorized to act as a caregiver to the qualifying patient;
 - c. Details to identify the caregiver;
 - d. A current, clear photo of the caregiver's face taken within six months of the application;
 - e. An attestation that the caregiver is not the caregiver for more than five qualifying patients;
 - f. A copy of the caregiver's government ID or other proof of identity;
 - g. A required fee; and
 - h. An attestation that the caregiver understands the restrictions on the use or redistribution of marijuana set forth in.



A patient may add or terminate a caregiver using the Hawai'i DOH website.

5.11.1.7 Laboratory Testing

The Hawai'i DOH will establish standards for the certification of one or more private and independent testing laboratories that will provide marijuana producers and consumers with valuable information pertaining to the identity, potency, composition, purity, and safety of medical marijuana. Certified laboratories will test a sample of every batch or lot of medical marijuana flower, medical marijuana concentrates, and medical marijuana-infused products that are to be sold in the state of Hawai'i.

Certified, independent testing laboratories will test each batch or lot of marijuana flower, concentrate, and infused products and provide a certificate of analysis that includes, at a minimum:

1. Chemical profile of the product, including cannabinoid and terpene constituents and potency; and
2. Confirmation that the product does not have unsafe levels of the following contaminants:
 - a. Heavy metals;
 - b. Foreign materials;
 - c. Microbiological impurities;
 - d. Pesticide residue, if applicable;
 - e. Residual solvents, if applicable; and
 - f. Residual levels of Volatile Organic Compounds (VOCs), if applicable.

5.11.1.8 Choosing a Dispensary

Hawai'i medical marijuana patients are not required to select a primary dispensary and can shop at any dispensary in the state of Hawai'i.

5.11.1.9 General Provisions

A written certificate and patient or caregiver identification card are non-transferrable, are the property of the State, and must be surrendered upon demand by authorized State regulatory bodies and their agents.

5.11.1.10 Patient Change of Information

Patient change of information REGISTRY identification card holders must notify the Hawai'i DOH of any changes to personal identifying information or application information within 30 days of the change(s). Cardholders must additionally notify the Hawai'i DOH within 72 hours of changes in the designated caregiver or if the patient identification card is lost or stolen.

5.11.1.11 Registry Card Suspensions and Revocations

The Hawai'i DOH will immediately revoke a patient's registration status and patient identification card if it determines a cardholder provided false information on the card



application, tampered with or used the card or registration fraudulently, or provided medical marijuana to an unauthorized person. Upon consideration of the totality of circumstances, the Hawai'i DOH may choose to suspend or revoke a qualifying patient or caregiver's identification card for a variety of reasons, including: purchasing greater amounts of medical marijuana than allowed by law, allowing someone else to use their identification card, or operating a motor vehicle under the influence. A cardholder will have five days to return his or her identification card to the Hawai'i DOH following the receipt of a notice of revocation or if the certifying physician terminates or fails to renew the written certification.

Termination of Written Certification

1. A certifying physician must terminate a written certification if:
 - a. The qualifying patient meets the physician's exclusion criteria;
 - b. Treatment with medical marijuana is no longer necessary for the qualifying patient;
 - c. Adverse effects of medical marijuana outweigh the benefits to the qualifying patient's health; or
 - d. There is evidence that the qualifying patient engaged in diversion of medical marijuana.
2. A certifying physician may choose to terminate a written certification if the qualifying patient demonstrates signs of substance abuse (for any substance); and
3. A certifying physician must notify the Hawai'i DOH within one (1) business day of the termination of any written certification.

5.11.1.12 Patient and caregiver cultivation

Registered qualifying patients and their caregivers must obtain medical marijuana only from a state-licensed dispensary. No patient or caregiver may cultivate medical marijuana, purchase medical marijuana from unauthorized sources, or obtain medical marijuana from other qualifying patients or designated caregivers.

5.11.1.13 Confidentiality and Information Protections

Information held by the Hawai'i DOH and by licensed dispensaries, processors, and cultivators about patients, caregivers and agents is confidential and shall not be disclosed without the written consent of the individual to whom the information applies or as required under law or pursuant to an order from a court of competent jurisdiction provided. However, the Hawai'i DOH may access the information held by licensees to carry out official duties. Law enforcement and the Hawai'i DOH will have access to the Registry as well.

5.11.1.14 Patient Protections

An insurer or managed care organization is not required to reimburse costs associated with medical marijuana use. Employers are also not required to allow for medical use of marijuana in the workplace, nor modify job duties or working conditions for a person using medical marijuana.



5.11.1.15 Prohibited Acts

Qualifying patients and caregivers are not immune from the imposition of any civil, criminal, or other penalties for the following:

1. Operating, navigating, or being in actual physical control of any motor vehicle, aircraft, or boat while under the influence of medical marijuana;
2. Smoking medical marijuana in any public place;
3. Smoking medical marijuana in a motor vehicle;
4. Undertaking any task under the influence of medical marijuana, when doing so would constitute negligence or professional malpractice;
5. Smoking medical marijuana on a private property that:
 - a. Is rented from a landlord; and
 - b. Is subject to a policy that prohibits the smoking of medical marijuana on the property;
 - i. *NOTE: These provisions do not apply to vaporizing;*
6. Smoking medical marijuana on a private property that is subject to a policy that prohibits the smoking of medical marijuana on the property of an attached dwelling adopted by:
 - a. The board of directors of the council of unit owners of a condominium regime; or
 - b. The governing body of a homeowners association;
 - i. *NOTE: These provisions do not apply to vaporizing;*
7. Allowing any person other than the qualifying patient to consume the patient's medical marijuana;
8. Allowing any person other than the qualifying patient or caregiver, if applicable, to possess the patient's medical marijuana;
9. Transferring a package obtained from a licensed dispensary or the medical marijuana inside to any person, except for a caregiver transferring it to a qualifying patient;
10. Diverting medical marijuana;
11. Distributing, possessing, manufacturing, or using marijuana that has been diverted;
12. Cultivating medical marijuana or manufacturing medical marijuana concentrates or infused products, except if employed by a licensed processor or licensed grower and registered with the Hawai'i DOH as an agent of that licensee; or
13. Possessing an amount of medical marijuana that exceeds the Hawai'i DOH's definition of a 30-day supply, unless authorized to do so by a certifying physician as documented in the written certification.

5.11.1.16 Patient, Caregiver, and Physician Legal Protections

Any of the following persons acting in accordance with the provisions of Hawaii's medical marijuana law and the Hawai'i DOH's regulations may not be subject to arrest, prosecution, or any civil or administrative penalty, including a civil penalty, including a civil penalty or disciplinary action by a professional licensing board, or be denied any right or privilege, for the medical use of marijuana:

1. A qualifying patient:
 - a. In possession of an amount of medical marijuana that does not exceed the Hawai'i DOH's definition of a 30-day supply; or



- b. In possession of an amount of medical marijuana that is greater than a 30-day supply if the qualifying patient's certifying physician stated in the written certification that a 30-day supply would be inadequate to meet the medical needs of the qualifying patient;
2. A certifying physician;
 3. A caregiver; or

A hospital, medical facility, or hospice program where a qualifying patient is receiving treatment.



5.12 Exhibit 12: Patient Counseling and Education SOP

5.6.1 Purpose

The creation and development of this procedure has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQulPP) that patients deserve.

HAR Requirement	Description
§11-850-34.a	A dispensary licensee shall establish and maintain written policies and procedures governing the qualifications, recruitment, hiring, and training of operators, employees, or subcontractors of production centers and retail dispensary locations.
§11-850-34.b	No person under the age of twenty-one shall be employed by a dispensary facility.
§11-850-34.c	Operators, employees, and subcontractors shall wear an identification badge issued by the dispensary with the photograph and name of the wearer in a visible location at all times when on the premises of a dispensary facility.
§11-850-34.d	A dispensary licensee shall provide training upon hire and annually to each employee. The training shall include, but not be limited to the following:
§11-850-34.d.1	Health, safety, and sanitation standards in accordance with this chapter;
§11-850-34.d.2	Security pursuant to this chapter;
§11-850-34.d.3	Prohibitions and enforcement pursuant to this chapter;
§11-850-34.d.4	Confidentiality pursuant to this chapter; and
§11-850-34.d.5	All other provisions of this chapter and chapter 329D, HRS, that apply to that person's scope of employment.
§11-850-34.d.6	The dispensary licensee shall provide the names of all employees to the department. Eff. DEC 14 2015
§11-850-40.a	A dispensary licensee shall safeguard and keep confidential from public disclosure any personally identifying information or the medical condition of a qualifying patient.
§11-850-40.b	A dispensary licensee shall prohibit photography or video recording inside a dispensary facility by anyone other than the dispensary licensee, the department, law enforcement personnel, or persons approved in writing by the department. Eff DEC 14 2015

5.6.2 Local Compliance

In accordance with applicable confidentiality requirements as defined by Hawai'i Administrative Rules Chapter(s): 11-850-34, 11-850-40 and enforced by the Hawai'i DOH, Hale O Laulima will utilize policies and procedures to ensure patients receive medical products that assure the safety, quality, identity, purity and potency expectations of the Hawai'i DOH and end user. All patient related interactions and records implemented in Hale O Laulima's Production and Retail Dispensary Facilities will be kept confidential and will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-34 and §11-850-40.

5.6.3 Definitions and Abbreviations:

Air-Conditioning ("A/C")

American National Standards Institute ("ANSI")

American Society for Testing and Materials ("ASTM")

Automated Data Processing/Point-of-Sale System ("ADP/POS")

Batch Production Record ("BPR")

BBC Research & Consulting ("BBC")



Board of Directors ("the Board")
Cannabidiol ("CBD")
Cannabidiolic Acid ("CBDA")
Cannabigerol ("CBG")
Chief Executive Officer ("CEO")
Chief Operations Officer ("COO")
Code of Federal Regulations ("CFR")
Community Right to Know Act ("EPCRA")
Compassionate Use Registry ("the Registry")
Conditionally Exempt Small Quantity Generator ("CESQG")
Continuing Medical Education (CME)
Critical Process Parameter ("CPP")
Current Good Manufacturing Practices ("cGMP")
Denver Relief Consulting ("DRC")
Department of Health ("DOH")
Electro-Conductivity ("EC")
Environmental Health Agency ("EHA")
Equal Employment Opportunity Commission ("EEOC")
Equipment Testing Laboratory ("ETL")
Executive Management Team ("EMT")
Executive Vice President ("EVP")
Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA")
Global Positioning System ("GPS")
Good Agricultural Practices ("GAP")
Good Handling Practices ("GHP")
Hale O Laulima ("HOL")
Hawai'i Administrative Rules ("HAR")
Hawai'i Medical Use of Marijuana Act ("the ACT")
Hazard Communication Standard ("HCS")
Health Insurance Portability Accountability Act ("HIPAA")
Health Savings Account ("HSA")
High Efficiency Particulate Arrestance (HEPA)
Immediately Dangerous to Life or Health ("IDLH")
Integrated Pest Management ("IPM")
International Fire Code ("IFC")
International Organization for Standardization ("ISO")
Master Batch Record ("MBR")
Masters in Business Administration ("MBA")
National Institute for Occupational Safety and Health ("NIOSH")
National Type Evaluation Program ("NTEP")
Occupational Safety and Health Administration ("OSHA")
Oxidation Reduction Potential ("ORP")
Personal Protective Equipment ("PPE")



Photosynthetically Active Radiation ("PAR")
Quality Assurance ("QA")
Quality Control ("QC")
Quality Control Team ("QCT")
Quality Control Unit ("QCU")
Quality Management System ("QMS")
Reverse Osmosis ("RO")
Safety Committee ("the Committee")
Safety Data Sheets ("SDS")
Safety, Quality, Identity, Purity, and Potency ("SQUIPP")
Self-Contained Breathing Apparatus Type Respirators ("SCBA's")
Standard Operating Procedure ("SOP")
Superfund Amendments Reauthorization Act ("SARA")
Tetrahydrocannabinol ("THC")
Tetrahydrocannabinol Acid ("THCA")
Total Dissolved Solids ("TDS")
Ultra-Violet ("UV")
United States Environmental Protection Agency ("EPA")
United States Food and Drug Administration ("FDA")
Worker Protection Standard ("WPS")
World Health Organization - Uppsala Monitoring Center ("WHO-UMC")

5.6.4 Patient Counseling and Education Overview

Hale O Lahuli has developed and will continuously improve policies and procedures for educating and supporting qualified registered patients (referred to as "patients," for simplicity) and patient legal representatives. Patient education materials will be provided to Hale O Lahuli's patients and all Retail Dispensary Employees, Patient Coordinators, and managers employed at the Retail Dispensary facilities will be trained at least once annually on patient education and counseling. Hale O Lahuli understands that marijuana as a medicine is still a very new concept and that a void exists in the educational materials and other information available to properly inform patients on its uses, ingestion methods, benefits and side effects of its use. In response to this void, the Retail Dispensary facilities will provide a variety of educational materials and services to assist patients and patient legal representatives in effectively and safely using marijuana as medicine. The educational materials will be available in languages and formats accessible to all patients we serve, including for the visually and hearing impaired. All educational materials will be available, upon request, for inspection by the Hawai'i DOH.

5.6.5 Advocacy Partnerships

Hale O Lahuli will establish and maintain a corporate sponsorship with Americans for Safe Access ("ASA"), the preeminent national patient information and advocacy non-profit group regarding medical marijuana. This sponsorship will provide Hale O Lahuli with preferred access to ASA's services, which include discounted publications for patient and patient legal



representatives, such as robust condition based booklets for Cancer, HIV/AIDS, Rheumatoid Arthritis, Movement Disorders, Gastrointestinal Disorders, Multiple Sclerosis, and other debilitating conditions defined in the Hawai'i Medical use of Marijuana Act; discounted training for employees; regular updates on materials and training and advocacy opportunities to promote advancements in patient care. Hale O Laulima will also work closely with the American Herbal Products Association and other medical marijuana and patient-focused organizations to ensure the content and people providing that content are reputable and well informed. In addition, the Retail Dispensary facilities will offer patients a wide variety of printed materials from these organizations as well as internally produced materials to promote the responsible and informed use of marijuana as a medicine. Hale O Laulima embraces its duties to all active stakeholders, including patients, the community, the State of Hawai'i, and all marijuana industry operators comparably committed to best practices. The Retail Dispensary facilities will actively participate as members in cooperative campaigns with other reputable businesses and established trade groups including the National Marijuana Industry Association.

5.6.6 Patient Communications

Each Retail Dispensary facility will have a public phone line, which patients may use to contact a Patient Coordinator. The Retail Dispensary facilities' number and Hale O Laulima website will be highlighted in the Patient Education Packet received during the first visit to the Retail Dispensary facility. Common patient questions pertaining to items such as dosing, product administration, and educational resources will be listed, with detailed answers, on the Retail Dispensary facilities' secure website, which is described in the Marketing and Advertising SOP. In addition, the Retail Dispensary facilities will provide an on-line chat feature during hours of operation where patients and patient legal representatives with secured access may submit anonymous questions to be answered by a Patient Coordinator or Retail Dispensary Employee. The Retail Dispensary facilities' website and social media presence will also provide round-the-clock public access to credible information pertaining to the use of medical marijuana, Retail Dispensary facilities product offerings, recommendations, and emerging research.

5.6.7 Adequate Patient Attention

Hale O Laulima is committed to providing exceptional, personalized service to all patients in a safe and comfortable environment. The Board of Directors (the "Board") will ensure the Retail Dispensary facilities is properly staffed to provide each qualified patient and patient legal representative with the opportunity to discuss their specific needs and all product and service offerings in depth with one of the Retail Dispensary facilities's registered and trained agents. The Human Resources Manager in coordination with the Retail Dispensary facilities Manager will adjust staffing levels and sales stations as needed to maintain exceptional service. Qualified patients and patient legal representatives who request delivery of marijuana products will have the opportunity to be counseled via phone or in person, upon delivery, on their medicine, Hale O Laulima product offerings, and any other desired items.



5.6.8 Patient Counseling and Education

5.6.8.1 Resources

[American Society of Health-System Pharmacists \(ASHP\) Guidelines of Pharmacist-Conducted Patient Education and Counseling](#)

5.6.8.2 Background and Philosophy

Inappropriate medication use is a well-documented issue that has been discussed for decades in political, professional, and academic spheres. A key cause of inappropriate medication use is lack of sufficient knowledge about the medications and their interactions with specific health issues, which often leads to deviation from the treatment plan or administration and dosing instructions. Without adequate information and comprehension, patients cannot adequately address their health-related needs.

Hale O Lahuli believes that Retail Dispensary facility personnel can contribute to positive health outcomes by educating and counseling patients and caregivers so that they are aware of their options for medicating, obtain products that are appropriate for present symptoms or conditions, are prepared to precisely administer the medicine in the appropriate dosage, and are knowledgeable about the signs of and appropriate measures for responding to adverse reactions or potential dependency.

Hale O Lahuli approaches education and counseling as interrelated realms of activity that are critically important for patient well-being. All Retail Dispensary facilities personnel will offer counseling and education to each patient or caregiver who visits our location. We believe that by encouraging patients and caregivers to take full advantage of the expertise and resources at their disposal, our patients will experience a higher quality of care, better treatment outcomes, and improved comprehension of the benefits, risks, and appropriate applications of medicinal marijuana.

Hale O Lahuli also believes it is important to extend our educational mission beyond the Retail Dispensary facilities. As such, Hale O Lahuli will engage other audiences, such as physicians and community members, in educational events and with informative resources in order to increase comprehension of medical marijuana on a larger scale.

5.6.8.3 Training Required

As described in the Staffing and Training SOP, Hale O Lahuli will require all Retail Dispensary facilities personnel to undergo training regarding patient counseling and education during orientation and at least once annually thereafter. Hale O Lahuli will regularly update all Retail Dispensary facilities personnel on relevant recent scientific findings and product information, which Retail Dispensary facilities personnel will share with patients and caregivers. Hale O Lahuli's Medical Director will be deeply involved in developing and implementing training for Retail Dispensary facilities personnel on patient counseling and education. All training modules



will be developed with consideration for how patient counseling and education is conducted in traditional medical and retail pharmacy settings.

The Retail Dispensary Employee working with a given qualified patient or patient's legal representative will be responsible for counseling and educating that person on medical marijuana, cannabinoid constituents of marijuana, routes of administration and their differential effects, product offerings of Hale O Lahilima, achieving proper dosage, and compliance with laws and regulations pertaining to patients. All Retail Dispensary Employees will be trained on the products offered by Hale O Lahilima, their effects, appropriate administration, and medical applications. Each time a new product is introduced in the Retail Dispensary facilities, all Retail Dispensary Employees must receive training about the product from the Retail Dispensary Facility Manager prior to counseling any patient. All Retail Dispensary Employees must be educated on and trained to discuss, at a minimum, the various available routes of administration of medical marijuana, the safety and efficacy of each product, health considerations, and the potential side effects of all products offered. Retail Dispensary Employees must provide patients with information on how to report reactions to products dispensed, if desired. Training will include guidelines for counseling patients who ask for information pertaining to illicit activities and for providing direction for patients who have questions that the Retail Dispensary Employee is unable to answer.

5.6.8.4 Required Training Modules

Patient counseling and education training will include, at a minimum:

4. Effective patient communication;
5. Marijuana as medicine;
6. Routes of administration and methods of consumption;
7. Analytical testing;
8. Dosing;
9. Communicating laws and regulations pertaining to patients;
10. Qualifying conditions;
11. Product offerings;
12. Resources for patients and patient legal representatives; and
13. Cross-cultural communication.

5.6.8.5 Environment

A critical component of willingness to be counseled and educated is the environment in which these activities take place. The counseling and education setting must be conducive to patient involvement and comfort. Hale O Lahilima will offer comfortable, private spaces that ensure confidentiality and encourage open communication between agents and patients or caregivers. The space will be equipped with learning aids, such as approved educational materials, topic-specific briefs that patients may take home, sample administration devices, and graphics, such as a chart with cannabinoids and terpenoids that highlights their medicinal properties and appropriateness for various qualifying conditions.



5.6.8.6 Patient Counseling and Education Process

The patient counseling and education process will generally involve:

1. Establishing a relationship with the patient to increase comfort:
 - a. Hale O Lahilima will aim to place all agents on a regular schedule so that patients or caregivers can continue seeing the same agent, if desired; and
 - b. If working with a first-time patient, the agent must introduce his/her self, explain that counseling and education services are readily available, and provide a general orientation to the Retail Dispensary facilities and the counseling and education process, including measures to protect patient privacy, the typical length of counseling and education sessions, and the typical steps in the dispensing process.
2. Assessing the patient's condition(s), symptom(s), and desired outcomes through open-ended questions:
 - a. Each patient should be encouraged to only share as much information as he/she is comfortable sharing; and
 - b. The agent should emphasize the confidentiality of the information shared.
3. Assessing the patient's knowledge of and experience with medical marijuana, including knowledge of various routes of administration;
4. Assessing the patient's concerns and uncertainties about medical marijuana use, or previous unpleasant experiences with medical marijuana products;
5. Providing information to fill patient's gaps in knowledge and understanding:
 - a. This may include providing information about cannabinoids and their medicinal properties, demonstrating appropriate administration for various products, etc.; and
 - b. Information can be provided:
 - i. Verbally;
 - ii. In written form;
 - iii. Through demonstrations; and
 - iv. Through the use of visual aids.
6. Assessing patient's comprehension of the information provided and confidence in his/her ability to administer the medicine appropriately.

5.6.8.7 Patient Counseling and Education Content

Hale O Lahilima understands patient education and counseling activities to be interrelated and overlapping, with the shared intention of improving patient health outcomes. During patient education and counseling sessions, agents will provide, at a minimum:

1. Information about appropriate products for the symptom(s) or condition(s) of concern;
2. Suggestions about the appropriate methods of administration based on information about the patient's lifestyle and constraints on administration frequency or route;
3. Information about product(s) selected, including:
 - a. Product name;
 - b. Route of administration;



- c. Administration device(s) needed and their appropriate assembly and use;
 - d. Dosing information, including dosage form, dosage, and proposed administration schedule;
 - e. Directions for preparing and administering the medicine;
 - f. Onset and duration of effects;
 - g. Expected benefits;
 - h. Potential risks and adverse effects, and how to minimize and recognize their occurrence;
 - i. Product expiration date;
4. Information about required analytical testing, the selected product's test results, and their meaning;
5. Adverse side effects, safety and efficacy concerns, and how to report these issues;
6. Status of the 30-day supply, such as whether the patient's entire 30-day supply has been dispensed, how much additional product may be dispensed this month, and when the patient can return for the next 30-day supply;
7. Instructions for proper storage;
8. Instructions for proper disposal of excess, unwanted, contaminated, or expired medication;
9. Warnings, including:
 - a. Activities that should be avoided while medicated, such as driving, operating equipment, and caring for children; and
 - b. Precautions to take when transporting and carrying medicine.
10. Pertinent legal information.

5.6.8.8 Resources for Linguistically Diverse Patients and Caregivers

Hale O Lahuli is dedicated to making counseling and education services accessible to patients and caregivers of all linguistic backgrounds. Hale O Lahuli will actively seek to establish a linguistically, culturally, racially, and ethnically diverse workforce and will explore the possibility of obtaining translation and interpretation services as needed to provide a superior quality of care for patients and caregivers who primarily speak languages other than English.

5.6.8.9 Patient Education Materials

5.6.8.9.1 Retail Dispensary Facility Manager Responsibilities

The Retail Dispensary Facility Manager(s) will provide and maintain patient education materials in accordance with the patient education guidelines set forth by the Medical Director. The Retail Dispensary Facility Manager may engage the services of a third-party for translation services, as necessary. The Retail Dispensary Facility Manager may only incorporate patient education materials from verified sources, including product information from Hale O Lahuli's cultivation and processing units, peer reviewed journal articles, and trusted patient advocacy organizations, including Americans for Safe Access. Any materials suggested by the Medical Director will be considered verified, based on her experience with academic medicine and clinical research.



5.6.8.9.2 Patient Education Materials Required

Hale O Lahuli will provide educational materials about medical marijuana to registered qualified patients and their authorized legal representatives upon their first visit to the Retail Dispensary facilities, in addition to legal and product-specific information. The Retail Dispensary Facility Manager will ensure an adequate supply of up-to-date educational materials is available for distribution. The educational materials will include at least the following:

1. Information to assist in the selection of marijuana, describing the potential differing effects of various strains of marijuana, as well as various forms and routes of administration;
2. Materials offered to patients and their caregivers to help enable them to track the strains used and their associated effects;
3. Information describing proper dosage and titration for different routes of administration. Emphasis shall be on using the smallest amount possible to achieve the desired effect. The impact of potency must also be explained;
4. A discussion of tolerance, dependence, and withdrawal;
5. Facts regarding substance abuse signs and symptoms, as well as referral information for substance abuse treatment programs;
6. A statement that patients may not distribute marijuana to any other individual; and
7. Any other information required by the Hawai'i DOH or deemed appropriate by the Retail Dispensary Facility Manager and/or Medical Director.

5.6.8.9.3 New Patient Education Packet

All new patients and caregivers visiting Hale O Lahuli for the first time shall receive a new patient education packet. The guide shall be updated regularly by the Medical Director and only include information from credible sources. Usage of all materials must be approved by the source.

5.6.8.9.4 Conditions Booklet

Hale O Lahuli will maintain a corporate sponsorship with Americans for Safe Access, the national patient information and advocacy non-profit group. Sponsorship provides Hale O Lahuli preferred access to American for Safe Access materials and training services. The sponsorship will provide Hale O Lahuli with:

1. Discounted publications for patient and caregivers including condition based booklets published by Americans for Safe Access on Cancer, HIV/Aids, Arthritis, Chronic Pain, Movement Disorders, Gastrointestinal Disorders, Multiple Sclerosis, and Aging;
2. Discounted training for Hale O Lahuli agents;
3. Regular updates and advocacy opportunities; and
4. Discounted certification by Americans for Safe Access for Patient Focus Certification.



5.6.8.9.5 Patient Hotline

Hale O Lahuli shall record messages relating to the most common patient issues including dosing and over-consumption relief for playback availability off hours. These common responses must also be included on the website.

5.6.8.9.6 Medical Professional and Community Education

Hale O Lahuli plans to establish educational events for medical professionals and the surrounding community. These events will be planned and executed by the Medical Director or his/her designee. The purpose of these events is to provide science-based, reliable information about medical marijuana in simple terms, to provide a forum for curious persons to get well-informed answers to their questions, and to dispel negative stereotypes and misunderstandings that reproduce stigma.

5.6.8.9.7 Education Events

The Retail Dispensary Facility Manager and Medical Director will coordinate and schedule quarterly educational events for qualified registered patients, caregivers, the surrounding community, and medical professionals including physicians and nurses. These events will be planned and executed by the Medical Director or his/her designee. The purpose of the events tailored to medical professionals and the surrounding community is to provide science-based, reliable information about medical marijuana in simple terms, to provide a forum for curious persons to get well-informed answers to their questions, and to dispel negative stereotypes and misunderstandings that reproduce stigma.

If desired, the Retail Dispensary Facility Manager(s) and Medical Director may engage an expert to develop or conduct specialized education courses, workshops, seminars, and/or lectures. Each event will cover one topic in detail and may include:

1. Distribution of specialized educational materials;
2. Lectures and guest speakers;
3. On-line content; and
4. Other content approved by the Board and Medical Director.

5.6.8.9.8 Patient Education Courses and Lectures

An appropriately trained Patient Coordinator or Retail Dispensary Employee will conduct such events, unless there is specialized content that is better suited for delivery from the Medical Director or a third-party expert. Topics may include, but are not limited to:

1. Cannabinoid medicine;
2. Strain selection;
3. Infused product selection;
4. Titration methods;
5. Dosing;
6. Home preparation;



7. Secure storage; and
8. Safety.

The Retail Dispensary facilities will adjust the schedule of classes in order to best serve the current educational needs of the patient and medical professional communities. The Retail Dispensary facilities will also offer individual counseling services, as described in previous sections of this SOP, to provide additional individualized support to our patient and patient legal representative base.



5.13 Exhibit 13: Patient Management SOP

5.13.1 Purpose

The creation and development of this procedure has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQulPP) that patients deserve.

HAR Requirement	Description
§11-850-34.a	A dispensary licensee shall establish and maintain written policies and procedures governing the qualifications, recruitment, hiring, and training of operators, employees, or subcontractors of production centers and retail dispensary locations.
§11-850-34.b	No person under the age of twenty-one shall be employed by a dispensary facility.
§11-850-34.c	Operators, employees, and subcontractors shall wear an identification badge issued by the dispensary with the photograph and name of the wearer in a visible location at all times when on the premises of a dispensary facility.
§11-850-34.d	A dispensary licensee shall provide training upon hire and annually to each employee. The training shall include, but not be limited to the following:
§11-850-34.d.1	Health, safety, and sanitation standards in accordance with this chapter;
§11-850-34.d.2	Security pursuant to this chapter;
§11-850-34.d.3	Prohibitions and enforcement pursuant to this chapter;
§11-850-34.d.4	Confidentiality pursuant to this chapter; and
§11-850-34.d.5	All other provisions of this chapter and chapter 329D, HRS, that apply to that person's scope of employment.
§11-850-34.d.6	The dispensary licensee shall provide the names of all employees to the department. Eff. DEC 14 2015
§11-850-40.a	A dispensary licensee shall safeguard and keep confidential from public disclosure any personally identifying information or the medical condition of a qualifying patient.
§11-850-40.b	A dispensary licensee shall prohibit photography or video recording inside a dispensary facility by anyone other than the dispensary licensee, the department, law enforcement personnel, or persons approved in writing by the department. Eff DEC 14 2015

5.13.2 Local Compliance

In accordance with applicable confidentiality requirements as defined by Hawai'i Administrative Rules Chapter(s): 11-850-34, 11-850-40 and enforced by the Hawai'i DOH, Hale O Laulima will utilize policies and procedures to ensure patients receive medical products that assure the safety, quality, identity, purity and potency expectations of the DOH and end user. All patient related interactions and records implemented in Hale O Laulima's Production and Retail Dispensary facility will be kept confidential and will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-34 and §11-850-40.

5.13.3 Overview

Hale O Laulima is committed to offering qualified patients in Hawai'i with a welcoming, safe environment in which they may access high quality marijuana products and reliable educational materials. All new patients will be offered a Patient Education Packet, which will contain information about patient registration and orders in the Registry, marijuana as medicine, methods of consumption, cannabinoids and product offerings, dosing, laboratory testing, and patient financial assistance programs, as well as a summary of applicable laws and regulations.



5.13.3.1 New Patient Registration

The Dispensary Facility Manager will ensure that all Patient Coordinators are properly trained to register new patients in the automatic data processing/point-of-sale ("ADP/POS") system, Biotrack. The Retail Dispensary Facility Manager will also ensure that herself or himself and each Patient Coordinator and Retail Dispensary Employee who must utilize the Registry is authorized to access the Registry and has successfully completed a DOH-approved course in their responsibilities related to patient confidentiality. Pursuant to §11-850-34 and §11-850-40, the Patient Coordinator will be responsible for verifying that the patient has an active registration and a current and valid physician's order when registering a new patient and upon each subsequent visit to the Retail Dispensary facility. The Retail Dispensary Facility Manager will be responsible for ensuring that upon new patient intake, any relevant Registry and contact information for the patient, and caregiver (if applicable) is entered into Biotrack and the documentation is properly attached to the patient file and securely stored in Hale O Lahuli's HIPAA-compliant cloud-based storage system. When a qualified patient or patient caregiver arrives at Hale O Lahuli for the first time, the person fulfilling Patient Coordinator duties will create and complete the new patient record, including an executed patient agreement.

5.13.3.2 Patient Record Information

All Retail Dispensary personnel are responsible for keeping the patient record up-to-date. Only employees authorized to make entries in Biotrack and to access the Registry may grant access to any patient or patient caregiver to the Retail Dispensary facility. The employee who grants access to the Retail Dispensary must ask the patient or patient caregiver at each visit if any changes need to be made to the patient record. The patient record will contain at a minimum:

9. The name of the patient;
10. The Registry number of the patient, or similar Registry information (to be determined once Registry is established);
11. The expiration date of the registration;
12. The date of birth of the patient;
13. The name of the designated caregiver of the patient, if applicable;
14. Documentation of any patient education and support materials provided to the patient or the designated caregiver of the patient, including, without limitation, a description of the materials and the date on which the materials were provided; and
15. Information on all orders dispensed and orders denied.

5.13.3.3 Patient Record Management

The Retail Dispensary Manager must ensure the ADP/POS system, Biotrack, complies with all laws, regulations, and Hale O Lahuli policies and procedures.



14. The Retail Dispensary Facility Manager must ensure Biotrack is secure at all times and that each employee authorized to use the system has received all necessary training and has been issued unique user login credentials;
15. The Biotrack system will record all entries made, the date, and the electronic signature and unique identification number of the employee utilizing the system;
16. The patient record will maintain an audit trail and back-up system so that no initial entry can be made illegible and the record is protected from loss, damage, or authorized use.;
17. The ADP/POS system, Biotrack, features and Hale O Lahuli procedures requiring verification of patient registration and order contents and will not allow an employee to dispense an amount of marijuana product in excess of the amount specified in the physician's order, to fulfill an order that has already been filled, or allow dispensing to a patient with an expired or invalid registration or their caregiver, if applicable;
18. The patient record will be made available to the DOH upon request;
19. The Retail Dispensary Facility Manager will ensure patient records are maintained for a minimum period of six (6) years after the last sales transaction recorded in the patient record;
20. Any employee dispensing marijuana product will enter dispensing actions into the Registry immediately upon dispensing the product to the qualified registered patient or patient's caregiver.
21. All employees of Hale O Lahuli will be trained at least once annually on the appropriate use of the HIPAA compliant computer network, recordkeeping compliance, protection of patient confidentiality, and provisions of HIPAA. The Medical Director will develop and provide this training and periodically monitor employees for the purpose of identifying and correcting non-compliance.

5.13.3.4 Release Required for Information

If a patient would like a Patient Coordinator to discuss their treatment with anyone other than their caregiver, including their physician, they must execute an Information Release Authorization Form. The Patient Coordinator must properly document such release and maintain an original copy of the release in the patient's record. However, patient information may be released to the DOH without authorization from the patient.

5.13.3.5 Patient Management Training

Hale O Lahuli will develop and implement a training program covering all aspects of patient management. All employees employed in the Retail Dispensary facility will be responsible for completing this training upon acquisition and at least once annually. Documentation of completion of this training will be maintained in the employee's file.



5.14 Exhibit 14: Staffing and Training Plan

5.14.1 Purpose

The creation and development of this procedure has been completed to ensure compliance with administrative rules as defined by the Hawai'i Department of Health and to promote patient, product and public safety. As rule changes occur and best practices evolve, the content of this document will be reviewed and updated where appropriate. Each step in our manufacturing and distribution processes is carefully performed and controlled so that the resulting medical marijuana products possess the safety, quality, identity, purity, and potency (SQulPP) that patients deserve.

HAR Requirement	Description
§11-850-17.a.3	Each employee of a dispensary;
§11-850-17.a.6	Each employee of a subcontracted production center or retail dispensing location;
§11-850-31.a	In all dispensary facilities, only the licensee, if an individual, authorized employees of the dispensary, and authorized employees of the subcontracted dispensary facilities, if any, shall be permitted to touch or handle any marijuana or manufactured marijuana products; provided that a qualifying patient or the primary caregiver of a qualifying patient may receive marijuana or manufactured marijuana products at a retail dispensing location following completion of a sale.
§11-850-31.c	No dispensary licensee, including a dispensary licensee's officers, employees, employees, or anyone with any financial interest in a licensed dispensary shall provide written certification pursuant to chapter 329, HRS, for the medical use of marijuana for any person.
§11-850-34.a	A dispensary licensee shall establish and maintain written policies and procedures governing the qualifications, recruitment, hiring, and training of operators, employees, or subcontractors of production centers and retail dispensary locations.
§11-850-34.c	Operators, employees, and subcontractors shall wear an identification badge issued by the dispensary with the photograph and name of the wearer in a visible location at all times when on the premises of a dispensary facility.
§11-850-34.d	A dispensary licensee shall provide training upon hire and annually to each employee. The training shall include, but not be limited to the following:
§11-850-34.d.6	The dispensary licensee shall provide the names of all employees to the department. Eff. DEC 14 2015
§11-850-35.a	A dispensary licensee shall have available at each dispensary facility a time clock or other adequate method to record the month, day, year, and time that each employee arrives at and leaves the facility.
§11-850-35.b	Time record entries shall be made at the time an employee reports for duty and again when the employee goes off duty and at any time the employee leaves and returns to the premises for any reason.
§11-850-35.c	A dispensary licensee shall maintain all employee records, including the specific employee training provided and hours worked. Eff DEC 14 2015
§11-850-36.b	Only employees designated by the dispensary licensee, who are trained and knowledgeable on the transportation protocols required by this chapter, shall transport marijuana and manufactured marijuana products. Every transport of marijuana and manufactured marijuana products shall be accompanied by at least two employees.
§11-850-36.i	The designated employees transporting marijuana and manufactured marijuana products shall not stop at a location not listed on the manifest.
§11-850-37.a	Each dispensary licensee shall be subject to an annual announced inspection and unlimited unannounced inspections by the department, and inspections by any other government employee or official acting in an official capacity.
§11-850-37.d	A dispensary licensee shall not refuse to allow inspection at any of its dispensary facilities, and its employees and personnel shall not delay or interfere with any inspection.
§11-850-41.a.5	Employee records.
§11-850-43.c	A dispensary licensee shall establish written policies and procedures to be followed by all of its employees for the disposal or destruction of unused, unsold, contaminated, or expired marijuana and manufactured marijuana products. Eff. DEC 14 2015
§11-850-51.a.3.B.iv	Dispensary employees; provided that qualifying patients and primary caregivers may only be authorized to enter retail dispensing locations;
§11-850-53.3	A maximum occupancy limit ratio in the secured sales room of two customers to every one retail dispensing location employee;
§11-850-71.b.2	Effective training and monitoring of employees and subcontractors who participate in the production of marijuana;
§11-850-72.b.3	Effective training and monitoring of employees and subcontractors who participate in the production of



HAR Requirement	Description
	manufactured marijuana products;
§11-850-82.a.2	Is independent from all medical marijuana dispensary licensees and employees and all other persons and entities with a financial interest in a dispensary licensee;
§11-850-101.g	Notices under this section shall be served either by mail, return receipt requested, or in person. Notice shall be served upon the individual applicant or any employee who is present in the facility, and is effective upon receipt. Eff DEC 14 2015

5.14.2 Local Compliance

In accordance with applicable employment practices as defined by Hawai'i Administrative Rules Chapter(s): 11-850-17, 11-850-31, 11-850-34, 11-850-35, 11-850-36, 11-850-37, 11-850-41, 11-850-43, 11-850-51, 11-850-53, 11-850-71, 11-850-72, 11-850-82, 11-850-85, 11-850-101 and enforced by the Hawai'i DOH, Hale O Laulima will utilize policies and procedures to ensure a standardized onboarding and training program. All employment related procedures and policies implemented in Hale O Laulima's Production and Retail Dispensary Facilities will be in full compliance with the provisions set forth in Hawai'i Administrative Rules Chapter(s): §11-850-34 and §11-850-35.

5.14.3 Definitions and Abbreviations:

Air-Conditioning ("A/C")
American National Standards Institute ("ANSI")
American Society for Testing and Materials ("ASTM")
Automated Data Processing/Point-of-Sale System ("ADP/POS")
Batch Production Record ("BPR")
BBC Research & Consulting ("BBC")
Board of Directors ("the Board")
Cannabidiol ("CBD")
Cannabidiolic Acid ("CBDA")
Cannabigerol ("CBG")
Chief Executive Officer ("CEO")
Chief Operations Officer ("COO")
Code of Federal Regulations ("CFR")
Community Right to Know Act ("EPCRA")
Compassionate Use Registry ("the Registry")
Conditionally Exempt Small Quantity Generator ("CESQG")
Continuing Medical Education (CME)
Critical Process Parameter ("CPP")
Current Good Manufacturing Practices ("cGMP")
Denver Relief Consulting ("DRC")
Department of Health ("DOH")
Electro-Conductivity ("EC")
Environmental Health Agency ("EHA")
Equal Employment Opportunity Commission ("EEOC")
Equipment Testing Laboratory ("ETL")



Executive Management Team ("EMT")
Executive Vice President ("EVP")
Federal Insecticide, Fungicide, and Rodenticide Act ("FIFRA")
Global Positioning System ("GPS")
Good Agricultural Practices ("GAP")
Good Handling Practices ("GHP")
Hale O Lahuli ("HOL")
Hawai'i Administrative Rules ("HAR")
Hawai'i Medical Use of Marijuana Act ("the ACT")
Hazard Communication Standard ("HCS")
Health Insurance Portability Accountability Act ("HIPAA")
Health Savings Account ("HSA")
High Efficiency Particulate Arrestance (HEPA)
Immediately Dangerous to Life or Health ("IDLH")
Integrated Pest Management ("IPM")
International Fire Code ("IFC")
International Organization for Standardization ("ISO")
Master Batch Record ("MBR")
Masters in Business Administration ("MBA")
National Institute for Occupational Safety and Health ("NIOSH")
National Type Evaluation Program ("NTEP")
Occupational Safety and Health Administration ("OSHA")
Oxidation Reduction Potential ("ORP")
Personal Protective Equipment ("PPE")
Photosynthetically Active Radiation ("PAR")
Quality Assurance ("QA")
Quality Control ("QC")
Quality Control Team ("QCT")
Quality Control Unit ("QCU")
Quality Management System ("QMS")
Reverse Osmosis ("RO")
Safety Committee ("the Committee")
Safety Data Sheets ("SDS")
Safety, Quality, Identity, Purity, and Potency ("SQIPP")
Self-Contained Breathing Apparatus Type Respirators ("SCBA's")
Standard Operating Procedure ("SOP")
Superfund Amendments Reauthorization Act ("SARA")
Tetrahydrocannabinol ("THC")
Tetrahydrocannabinol Acid ("THCA")
Total Dissolved Solids ("TDS")
Ultra-Violet ("UV")
United States Environmental Protection Agency ("EPA")
United States Food and Drug Administration ("FDA")



Worker Protection Standard ("WPS")

World Health Organization - Uppsala Monitoring Center ("WHO-UMC")

5.14.4 Introduction

Hale O Lahuli's Staffing and Training Plan details all positions that will be filled in the marijuana Production and Retail Dispensary Facilities, provides a complete organizational chart, job descriptions, describes hiring criteria and educational or experiential requirements for each position, day-to-day schedules, and illustrates all aspects of staffing and training processes and procedures. This plan describes the processes and control mechanisms used to manage human resources in order to provide the highest quality medically-toned medical marijuana products while acting in compliance with state law and Hawai'i DOH requirements. This plan will ensure Hale O Lahuli has sufficient staff possessing the correct skills sets and experience to ensure successful, continuous operations. This plan identifies the policies and procedures used by the general and Facility Managers to manage staff throughout each unit.

The following details the employee acquisition process along with procedures for skill-set assessments, terminations and transitions. It is established that no employee or consultant may work on-site prior to receiving orientation training or when any required critical training is eight weeks or more past due. A sample form from the Job Candidate Log, where reference checks will be recorded, and the Production Facility organizational chart are included.

Employees are subject to all applicable policies established by Hale O Lahuli in the Employee Manual or as otherwise directed by management at any other time. The Human Resources Manager, in coordination with the Facility Manager, is assigned responsibility for personnel policy and procedure documentation, maintenance, implementation and training.

5.14.5 Organizational Chart

The following organizational charts include position descriptions and the names and basic qualifications of persons holding each position to the extent those positions have been filled at time of application submission. The organizational chart attached is a visual representation of the hierarchically-structured organization for all facilities and administrative and executive positions, in which all employees are overseen by a manager assigned to their particular production area or job duties.

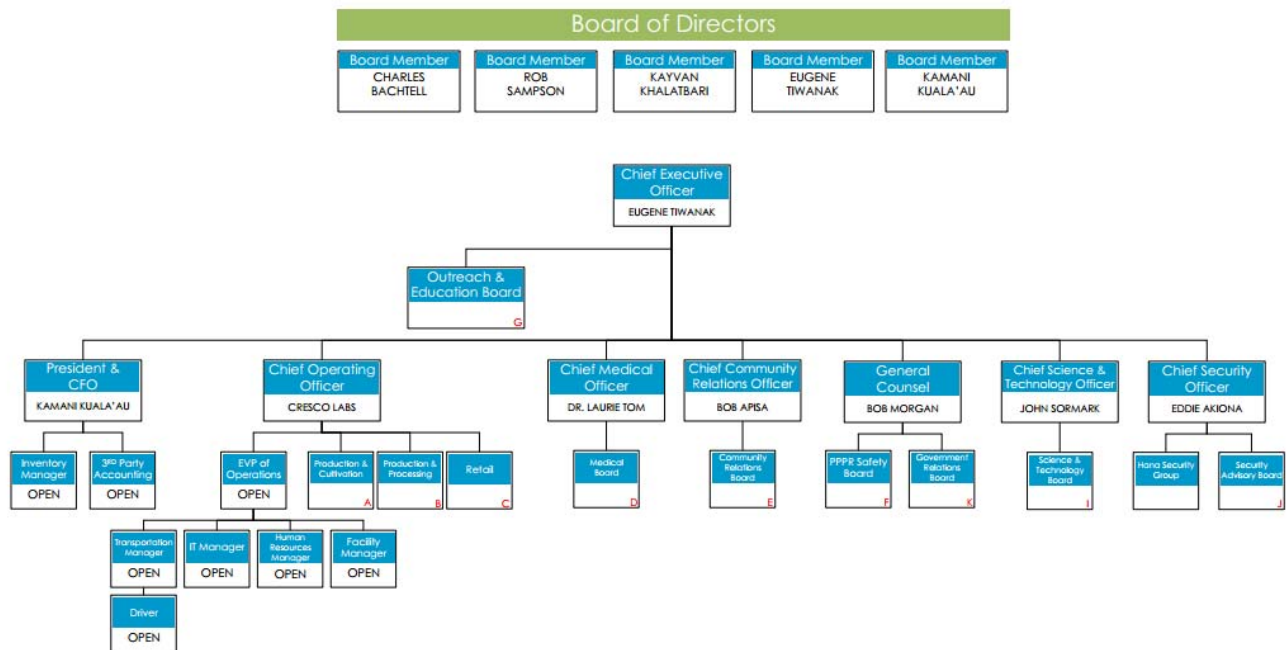
Hale O Lahuli encourages employee development and empowerment. Employees are encouraged to provide input and suggest new policies and processes on a regular basis. However due to the highly regulated and security-intensive nature of our operations, Hale O Lahuli employs a Hawai'i DOH-based bureaucratic structure. The Facility Manager(s) oversee employees assigned to their facility. The COO oversees the Facility Managers.

The organizational chart(s) illustrates the compartmentalization of each Hale O Lahuli facility and staff by function, which, in combination with the smart card access control described in the Access Control SOP serve to restrict staff movement between production areas, ensure that



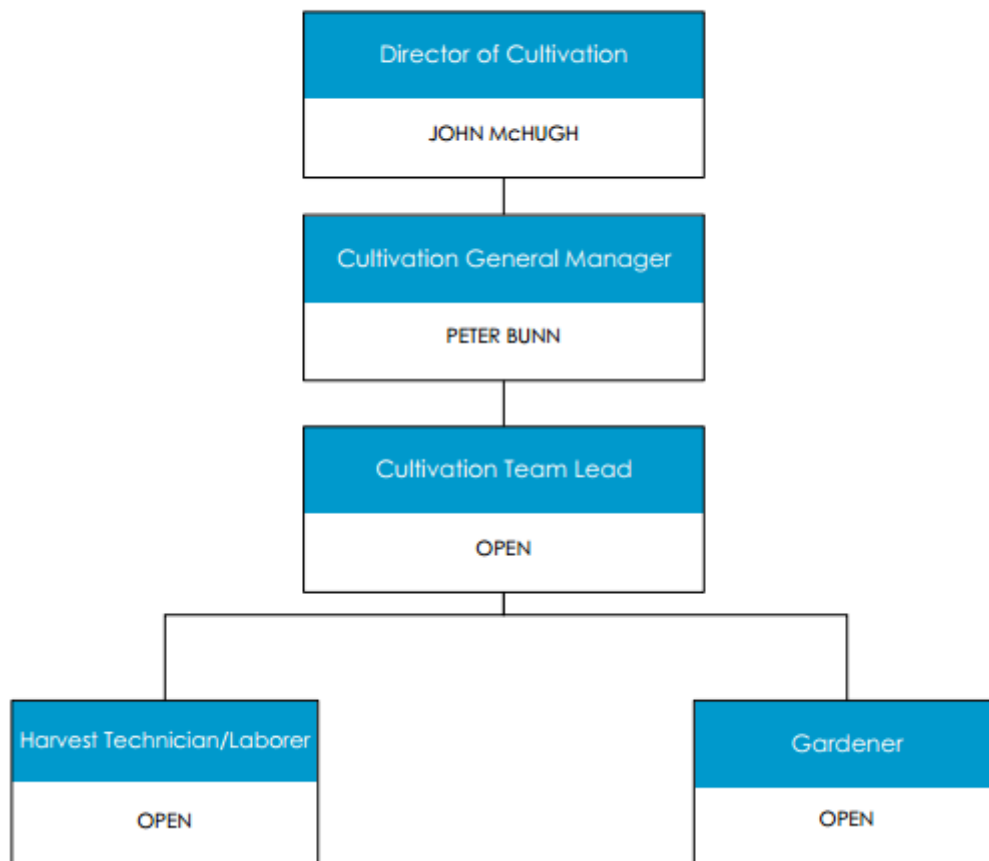
only necessary personnel have access to each area of a Hale O Laulima facilities, provide records of staff movement between compartments, and document the chain of custody of all marijuana and marijuana products.

Hale O Laulima Corporate Organizational Structure



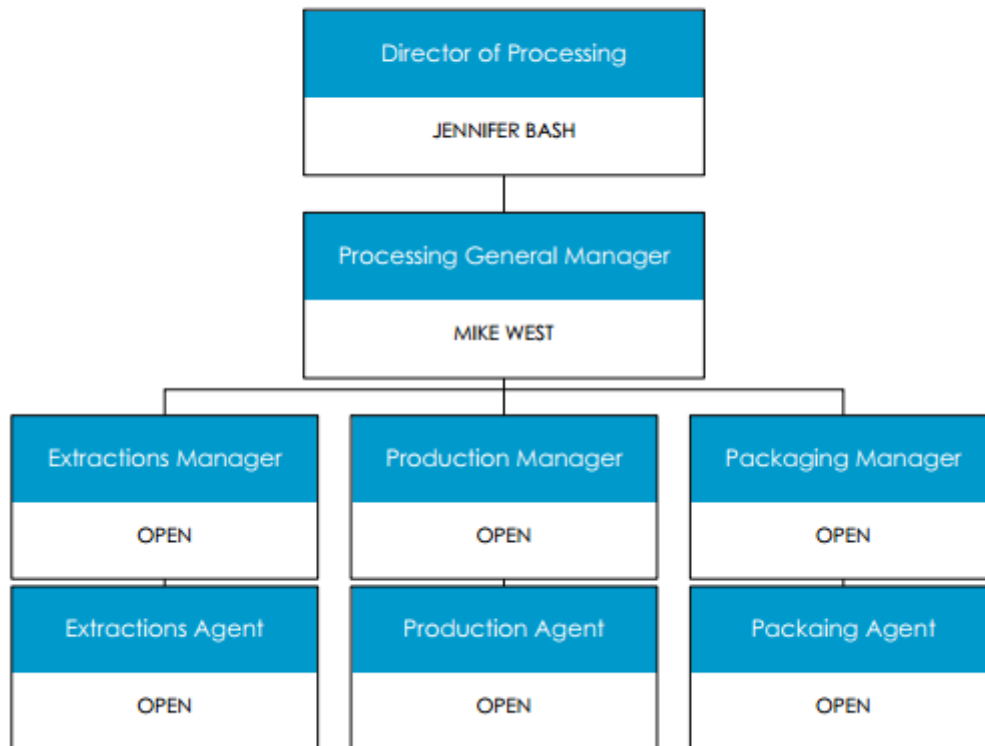


Hale O Lailima
Production Cultivation Organizational Structure (x2)



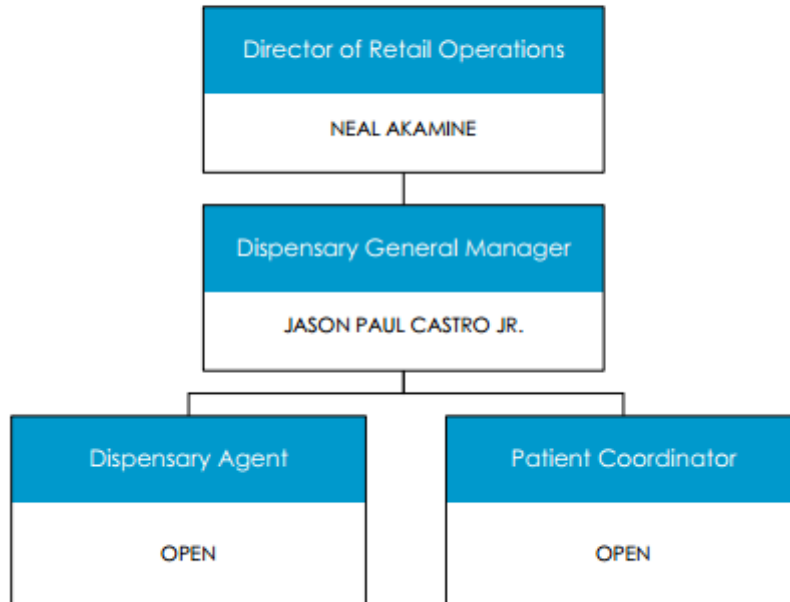


Hale O Lahima
Production Processing Organizational Structure (x2)

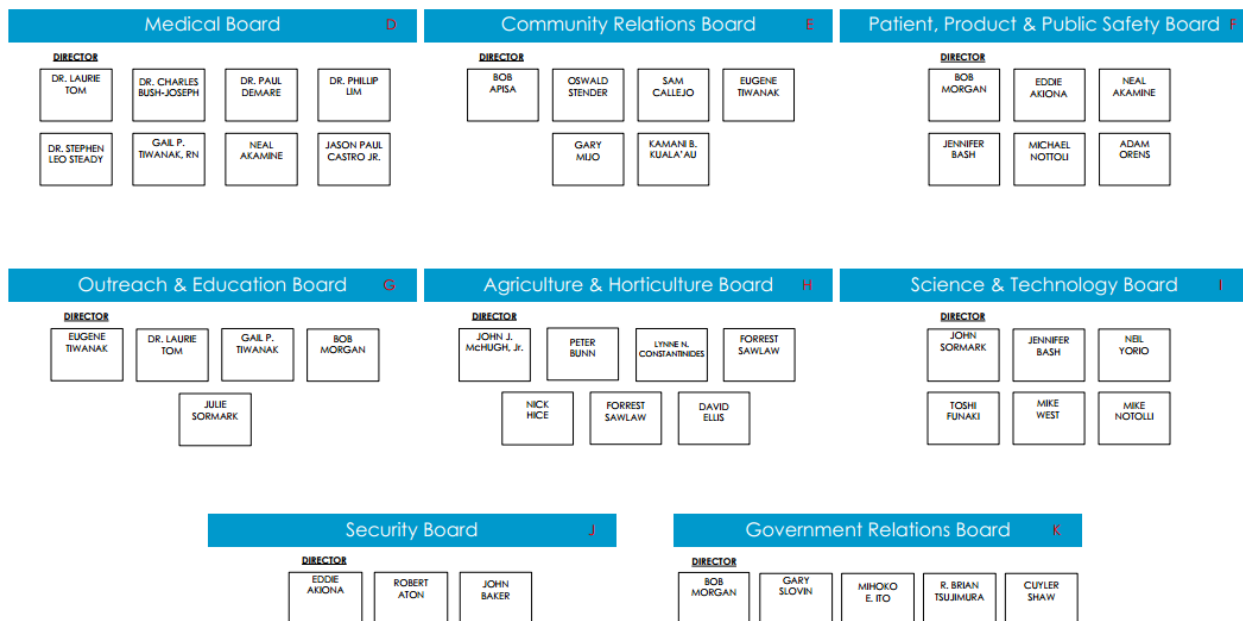




Hale O Laulima Retail Dispensary Organizational Structure (x2)



Hale O Laulima Advisory Boards





5.14.6 Staffing Overview

The following sections outline the process of planning for, acquiring and managing the human resources of the Production and Retail Dispensary facility functions of Hale O Lahilima. These cultivation, processing and dispensary staffing processes and procedures are designed to guarantee that Hale O Lahilima will acquire and maintain adequate numbers of personnel with appropriate skills to meet the cultivation, processing, dispensing and operational needs of the organization to meet patient demand, while maintaining complete compliance with Hawai'i DOH regulations and with Hale O Lahilima's high standards of professionalism and service. This plan outlines the process of acquiring production, processing and retail dispensary personnel, describes responsibilities assigned to each position, discusses transition of staff to new job duties, and describes policies and procedures that the Human Resources Manager will use to manage personnel in each position.

5.14.6.1 Staffing Plan Development and Maintenance

The COO in coordination with the Director of Cultivation / Retail Dispensary Facility Manager and Human Resources Manager will develop and maintain a staffing plan for the facility. The staffing plan will be designed to ensure that the Production and Retail Dispensary Facilities are appropriately staffed for efficient operations and that additional positions are filled in accordance with patient demand and financial feasibility. The COO, Director of Cultivation / Retail Dispensary Facility Manager and Human Resources Manager will review and update the staffing plan quarterly as Hale O Lahilima proceeds through the business life cycle including the start-up, growth, establishment, expansion and maturity stages. The Human Resources Manager will determine how to fill each position needed utilizing staff or outside resources. The Board will approve plans for production and retail dispensary staffing as needed.

5.14.7 Hiring, Record Keeping, and Termination

5.14.7.1 Hiring

5.14.7.1.1 Department Registration Required

Employees of Hale O Lahilima must meet all requirements of the Hawai'i DOH and be properly registered with the Hawai'i DOH.

5.14.7.1.2 Adherence to Law and Regulation Required

It is Hale O Lahilima policy to terminate any employee if they are found to have violated any provision of law or regulation and to report any such violation to the Hawai'i DOH and law enforcement as appropriate and in accordance with Hale O Lahilima termination policies.

5.14.7.1.3 Adherence to Hale O Lahilima Policy Required

All employees are subject to all applicable policies established by Hale O Lahilima in this document, the Employee Manual or as otherwise directed by management at any other time.



The Facility Manager is responsible for personnel policy and procedure documentation, maintenance, implementation and training.

5.14.7.1.4 No Drug Convictions Allowed

It is Hale O Lahuli policy not to employ any person who has a misdemeanor conviction for a drug related offense in any capacity without prior approval from the COO. Regulations prohibit any individual with a felony conviction from working as an employee.

5.14.7.2 Recordkeeping

5.14.7.2.1 Personnel Records

The Human Resources Manager will maintain a personnel record (separate from payroll records to be kept for seven (7) years for each employee for at least six (6) years after termination of the employee's affiliation with Hale O Lahuli and will include, at a minimum, the following:

1. All materials submitted to the Hawai'i DOH pursuant to all applicable laws and regulations;
2. Documentation of verification of references;
3. The job description or employment contract that includes duties, authority, responsibilities, qualifications and supervision;
4. Documentation of all required training and the signed statement of the individual indicating the date, time and place he or she received said training and the topics discussed, including the name and title of presenters;
5. A copy of the application that Hale O Lahuli submitted to the Hawai'i DOH on behalf of any prospective employee;
6. Documentation of periodic performance evaluations, written warnings and performance notes;
7. A record of any disciplinary action taken; and
8. All background check reports obtained in accordance with applicable laws and regulations.

5.14.7.2.2 Compensation Records

The Human Resources Manager will maintain records documenting the stipend, salary and wages paid to each employee and any executive compensation, bonus, benefit or item of value paid to any individual affiliated with Hale O Lahuli, including members of Hale O Lahuli. Such records will be maintained for a period of at least six (6) years.

5.14.8 Staffing Plan Elements

The staffing process will be managed and directed by the Facility Manager in coordination with the Human Resources Manager, and consists of five continuous elements:

1. Planning;
2. Acquisition;
3. Training;



4. Transition; and
5. Termination.

5.14.8.1 Planning

The plan for Production and Retail Dispensary Facilities staffing is based on business plan assumptions and will be adjusted by the Human Resources Manager in accordance with actual operating needs.

5.14.8.1.1 Skill Set Assessments

A substantial level of operational risk is introduced when operating without a sufficient number of staff possessing the necessary skills or experience to fulfill their job tasks, or when relying heavily on outside resources to facilitate operations. In order to avoid introducing operational risk, the job skills needed for each position in each facility will be established and employees will be assessed in accordance with the skills needed for their position, thereby allowing the identification and correction of any job skills risk. The three key components of skill set assessments follow:

1. The Human Resources Manager will prepare a Job Skills Gap Assessment for every position filled in Hale O Lahuli facilities;
2. Each employee's supervisor will complete a Job Skills Gap Assessment upon acquisition, at the beginning and end of a probationary period, and once per year thereafter in conjunction with the annual review; and
3. The Human Resources Manager will review the assessments and address any job skills risk.

5.14.8.1.2 Resource Analysis

The Human Resources Manager in coordination with Facility Managers will estimate all staffing needs based on market expectations and current resources.

The Human Resources Manager will periodically conduct Job Skills Gap Assessments to determine human resources needs based on the known skill gaps and strengths of employees at each facility. Analysis of Job Skills Gap Assessments will help identify situations where demand for certain skills exceeds supply, such as when critical work demand or personnel numbers or competencies will not meet future needs. It will also help identify situations where future supply will likely exceed demand.

The Human Resources Manager will review Job Skills Gap Assessments with the Facility Manager(s); the two will collaboratively produce suggestions for staffing adjustments, contained in a staffing estimate for the next quarter.

If acquisitions or terminations are proposed, the staffing estimate proposal will be presented to the COO and the Board, who will approve, deny, or modify the estimate in accordance with projected patient demand and the financial situation of Hale O Lahuli as a whole.



Approved staffing estimates will guide additional staff acquisition, termination, transfer, or modification.

5.14.8.2 Acquisition

The Facility Manager will coordinate with the Human Resources Manager to acquire all necessary staff. Acquisition will take place in multiple phases – fewer employees will be needed in initial phases of operation and more employees will be added to adequately staff Hale O Lahilima facilities as the patient population increases. In later operational phases, acquisition process may vary depending on the vacant position and any special circumstances including Board and/or CEO approval for a direct non-solicited hire. The acquisition process will be managed by the Administrative Controller in initial phases of operation, and later by the Human Resources Manager. As detailed in this plan, our Community Integration SOP and the Local Residency and Job Creation SOP, we are committed to finding operational talent from the surrounding community and we will attempt to fill all Hale O Lahilima positions with qualified applicants in the local community, which we see as a tremendous resource, before expanding the search radius.

5.14.8.2.1 Minimum Requirements

The acquisition process will be managed by the Human Resources Manager, and will always include, at a minimum:

1. Performing a criminal background check on the selected candidate to determine eligibility for Hawai'i DOH registration;
2. Application to the Hawai'i DOH for registration;
3. Providing new staff with the Employee Manual, which they will be required to review, accept and acknowledge in writing;
4. New hire orientation and training upon successful registration; and
5. Completion of the probationary period.

5.14.8.2.2 Staff Acquisition Process

The acquisition process typically involves the following:

1. Identification of need;
2. Job classification and job description preparation;
3. Solicitation of the vacant position utilizing the methods that best fit the position including, but not limited to:
 - a. Internal posting;
 - b. Partner posting (consultants, non-profit partners, vendors, etc.);
 - c. External posting (i.e. not on the facility premises);
 - d. Temporary staffing agency;
 - e. Local college and or other programs focusing on agriculture; or
 - f. Executive search firm.



4. Reviewing resumes, cover letters, and required job applications for qualified candidates including those with relevant experience and those with complementary skills and a strong potential for growth;
5. Performing and recording in the Job Candidate Log reference checks on qualified candidates including:
 - a. Verification of address and education; and
 - b. Verification of former and current employment.
6. Recording of information from former supervisors on the candidate's performance if available;
7. Scheduling first interviews with the Human Resources Manager;
8. Scheduling second interviews (with strong candidates) with the Human Resources Manager and the Facility Manager;
9. Delivery of an offer letter to the first choice candidate;
10. Performing a criminal background check on the selected candidate to determine eligibility for a Hale O Lahuli facility employee identification card on the basis of Hawai'i DOH requirements and to identify any other possible disqualifying items;
11. Application to the Hawai'i DOH for issuance of an employee identification card; and
12. Completion of the probationary period.

5.14.8.2.3 Consultant Acquisition

Consultants may be utilized when approved by the CEO, COO or Board. All consulting contracts will contain suitability provisions and require compliance with all applicable laws and regulations. Consultants will receive a written copy and acknowledge all policies and procedures. Consultants may be used for circumstances, including but not limited to, when the staff does not possess the necessary qualifications for necessary operations; where third-party services are desired for separation of duties (i.e. accounting, audit and compliance); if the position does not call for a full-time employee but requires a specific skill set; during the period a necessary position is vacant; or for any other reason deemed acceptable by the Board / CEO.

5.14.8.2.4 Staffing Phases

All staffing will be carried out in phases, in accordance with this plan. Staffing needs will be much more minimal in the first year of operations than in later years, as the scale of marijuana production and retail operations will be tailored to meet patient needs. Data from medical marijuana states indicates a period of ramp-up in which patient registration is initially low and increases over the years. Hale O Lahuli plans to fill all positions identified on the organizational chart to reach full staffing by the time the medical marijuana program and Hale O Lahuli reach maturity.

5.14.8.2.5 Facility Employee Identification Card

All Production and Retail Dispensary Facilities employees will apply to the Hawai'i DOH for an employee identification card, if subsequently required by the Hawai'i DOH, prior to beginning employment at Hale O Lahuli facilities.



5.14.8.2.6 Disqualifying Items

All Hale O Lahilima employees will be issued an employee identification card from the Hawai'i DOH, is subsequently required, prior to commencing work at Hale O Lahilima facilities. Hale O Lahilima will not hire any person that is not eligible for a Hawai'i DOH-issued employee identification card.

5.14.8.2.7 Discriminatory Practices Prohibited

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at Hale O Lahilima will be based on merit, qualifications and abilities. All managers and supervisors will comply with Equal Employment Opportunity Commission (EEOC) guidelines when managing personnel issues. Hale O Lahilima will not discriminate in employment opportunities or practices on the basis of:

1. Race, national origin or ethnic background;
2. Height and weight;
3. Credit rating or economic status;
4. Religious affiliation or beliefs;
5. Citizenship;
6. Marital status, civil partnership or number of children;
7. Age;
8. Gender, gender identity or expression;
9. Sexual orientation;
10. Security/background checks for certain religious or ethnic groups;
11. U.S military or veteran status;
12. Disability or medical condition; or
13. Questions and examinations.

5.14.8.2.8 KEY POSITIONS – JOB DESCRIPTIONS

For a hierarchy of all positions within Hale O Lahilima, please refer to the organizational charts located in the Business Plan.

Corporate

1. Chief Executive Officer (CEO):
 - a. Position Summary: Responsible for the oversight of the Chief Operating Officer ("COO"), President, and Executive VP, Chief Medical Officer, Chief Community Relations Officer, General Counsel, Chief Science and Technology Officer, and Chief Security Officer; primary liaison with the Hawai'i Department of Health and other regulators; responsible for approving and updating company policies and procedures; approving executive-level compensation plans; strategic vision; maintaining Company mission; approval of Business Plan updates and financial projections; develop a strategic plan to advance the Company's mission and



objectives; to promote revenue, profitability, and growth as an organization; evaluate the performance of Executive Management Team members for compliance with established policies and objectives of the Company; present Company reports at Annual Company Board meetings; public relations representative, including representing the Company in media and other public forums.

2. Chief Operations Officer (COO):

- a. Position Summary: Responsible for company operations to ensure production efficiency, quality, service, and cost-effective management of resources; planning, developing, and implementing strategies for generating resources and/or revenues for the Company, in conjunction with the Chief Financial Officer; coordinate with Director of Cultivation to develop, update, and maintain company operation procedures, policies, and standards; operations management, including the development, design, operation and improvement of the systems that create and deliver the Production Facility's products; ensuring that business operations are efficient and effective and that the proper management of resources, distribution of goods and services to customers is conducted; revisions of Business Plan and overseeing changes to financial projections in coordination with the President; management of vendor relationships and selection of product and equipment materials.

3. President / Chief Financial Officer ("President"):

- a. Position Summary: Responsible for supervising Inventory Manager and external accounting firm; ensuring execution and implementation of CEO-approved Business Plan, strategic vision, and company policies; oversight of financial accounting records and filings; ensuring proper financial accounting and asset management; tracking retail location sales; development and maintenance of strategic partnerships; oversight of financial projections and Business Plan revisions in coordination with the CEO; oversight of marketing and advertising materials; and implementation of the community integration initiatives set forth in the Community Integration & Benefits Plan.

4. Executive Vice President ("EVP") of Operations:

- a. Position Summary: Responsibilities include supervision of Transportation, IT Manager, Human Resources Manager, and Facility Managers; supporting all functions of the President; oversight of dispensary day-to-day operations; coordination of various on-site operations employees and critical operations challenges; ensuring proper management of all Company facilities and properties; creating, communicating and implementing the organization's vision, mission, and overall direction; evaluating the success of the organization; maintaining awareness of both the external and internal competitive landscape, opportunities for expansion, customers, markets, new industry developments



and standards; performing all other responsibilities as assigned by the President or CEO.

5. Chief Medical Officer (“CMO”):

- a. Position Summary: Responsibilities include serving a critical role in the execution of the mission and operations of the Company. The CMO shall report to the CEO, and collaborate with the COO, Chief Community Relations Officer, and Chief Science and Technology Officer to integrate strong medical research and clinical perspectives into both daily operations and the long term mission of the Company; serve as a liaison to the Medical Advisory Board; monitor relevant and developing medical research and related medical marijuana data to other senior Company executives; develop policies and protocols for Retail Dispensary employees relative to patient education on the medical benefits and research behind medical marijuana; and coordinate with the CEO on other community boards, research studies and programs, and Company involvement in medical research activities.

6. Chief Community Relations Officer (“CCRO”)

- a. Position Summary: Responsibilities include serving as the liaison to the Company’s Community Relations Advisory Board, and for the planning, oversight of development and implementation of all of Company’s marketing strategies, marketing communications, and public relations activities, both external and internal; directs the efforts of the Retail Dispensary employees to coordinate the Company’s involvement in community and industry events, and collaborates with other community partners, allies, and Honolulu County community and government leaders; serves as a community outreach representative to plan and coordinate the Company’s involvement in community and industry events and programs; and in conjunction with CEO, assists in responding to all press inquiries for the Company.

7. Chief Science & Technology Officer (“CSTO”)

- a. Position Summary: Responsibilities include serving as the liaison to the Company’s Community Relations Advisory Board, and for the planning, oversight of development and implementation of all of Company’s marketing strategies, marketing communications, and public relations activities, both external and internal; directs the efforts of the Retail Dispensary employees to coordinate the Company’s involvement in community and industry events, and collaborates with other community partners, allies, and Honolulu County community and government leaders; serves as a community outreach representative to plan and coordinate the Company’s involvement in community and industry events and programs; and in conjunction with CEO, assists in responding to all press inquiries for the Company.



8. Chief Security Officer ("CSO"):

- a. Position Summary: Responsibilities include the management of Company's subcontractor security provider and collaboration with the Security Advisory Board. The CSO's responsibilities shall include developing and implementing security policies and protocols; working with COO on all security-related facility matters and systems; manage staff security training and ongoing education; oversee sporadic unannounced security audits; collaborate with state, county and local law enforcement; Coordinate with Facility, Transportation and IT Managers so systems incorporate necessary security firewalls and protocols; oversee investigation into any real or potential security breach (physical or data breach); maintain industry best practices with regards to security and regularly communicate with security professionals on the islands and security teams at marijuana businesses throughout the country.

9. Inventory Manager:

- a. Position Summary: Responsibilities include the development of the company's inventory management strategy with the aim of controlling costs within budgetary limits, generating savings, rationalizing inventory, and maximizing available working capital; supplier and vendor coordination; execution of inventory control measures to ensure that the company minimizes inventory holding and maximizes stock system and paperwork accuracy; ensuring that incoming product is received and managed appropriately, according to company procedure; ensuring that input and packaging materials are ready and available for production, as and when required, and the accuracy of the inventory management system for all Hale O Lahilima locations.

10. Information Technology Manager ("IT Manager"):

- a. Position Summary: Responsible for all the implementation of, maintenance, security, and reporting of the Dispensary's information technology systems; oversight of employee training of IT equipment and software systems at Production and Retail Dispensary Facilities; advising the EVP of Operations and COO regarding IT equipment and software needs and projected costs; participating in Company meetings addressing Dispensary's electronic security equipment; and development of Company protocols on IT equipment use and maintaining electronic security and safety of patient records and information.

11. Human Resources Manager ("HR Manager"):

- a. The EVP of Operations will cover the Human Resources Manager position until facility expansion and staff hiring requires the creation and procurement of a distinct Human Resources Manager position for efficient operations. When a distinct HR Manager is acquired, responsibilities will include the oversight of employee hiring, all aspects of the staffing process as described herein, and staff



training in coordination with all facility managers; addressing staff performance issues; addressing staff complaints, termination, and intercompany transfers; and, in coordination with the EVP of Operations, maintaining staff compliance with all rules.

Production – Cultivation Positions

1. Director of Cultivation:

- a. **Position Summary:** Responsible for the general oversight and planning of plant cultivation and production operations; advising Company executives regarding marijuana production and manufacturing strategies, optimization, and quarterly cultivation reports to the Company's CEO and Board of Directors; ensuring cultivation practices are executed according to Company standard operating procedures and policies and exceed quality standards; and supervise Cultivation General Managers at Production Facilities.

2. Cultivation General Manager:

- a. **Position Summary:** Responsible for managing the day-to-day operations of the Company's Production Facility in accordance with the State and standards set by Company; providing support for all Production Facility employees, including scheduling, training, policy and procedural updates, industry news, and product information; the documentation, ordering, and receiving of all inventory and products; reporting any failures to satisfy Company's high output standards or product issues at certified laboratories; approving batches of harvested marijuana for processing, packaging, labeling, and sale after receiving passing test results from the Department-approved laboratory arranging deliveries; and maintaining facility compliance, and cleanliness.

3. Cultivation Team Lead:

- a. **Position Summary:** Responsible for assisting in the day-to-day functions of the marijuana plant production areas; managing gardeners and harvest technicians; ensuring that all processes, training requirements, schedules, policies and procedures are followed, and that the cultivation production goals are met; and the documentation and tracking accuracy of all inventory and products, maintaining facility compliance, and cleanliness.

4. Gardener:

- a. **Position Summary:** Responsible for providing on-site cultivation for medical marijuana Production Facilities; completing tasks assigned by the Cultivation Team Lead to monitor and maintain plant production and health; maintaining quality control measures to ensure high quality product; maintaining organization, cleanliness and efficiency of production area; carrying out day-to-day plant care including watering, pruning, harvesting and trimming; and the



monitoring and maintenance of plant production and quality control measures in accordance with the State and standards set by Hale O Laulima.

5. Laborer / Harvest Technician:

- a. Position Summary: Responsible for providing support for the harvesting, trimming, and packaging of Hale O Laulima's marijuana products; completing tasks assigned by the Cultivation Team Lead to ensure the visual aesthetic and high quality of Hale O Laulima's product; carrying out day-to-day tasks including plucking, trimming, hanging, and drying of Hale O Laulima's product; maintaining excellent personal hygiene, workspace cleanliness, and quality control measures to ensure high quality product in accordance with the State and standards set by Hale O Laulima.

Production – Processing and Manufacturing Positions

1. Director of Processing:

- a. Position Summary: Responsible for working in conjunction with the Director of Cultivation in developing and implementing manufacturing standard operating procedures and training protocols; the supervision of Processing General Managers; management of budgets for processing operations, equipment and supplies; assisting in the development and implementation of training programs for Production Facility employees; and the oversight and general compliance of all manufacturing activities at the Production Facilities.

2. Processing General Manager:

- a. Position Summary: Responsible for the oversight of production processes involving manufacturing and ensuring the safety of manufacturing staff during manufacturing operations; coordination with Director of Processing for the oversight of day-to-day functions of the manufacturing production areas; managing all production staff involved with manufactured marijuana products; ensuring that the production staff are qualified, possess appropriate education, training, and experience; ensuring that all manufacturing staff perform their job duties in such a manner as to provide assurance that manufactured marijuana product have the identity, purity, strength, and composition that is represented on the label; creation of master production formulas for each product and entry into the automated data processing / point-of-sale system system; approving products for packaging, labeling, and sale after receiving passing test results from the Department-certified laboratory; and ensuring that all company processes, policies and procedures are followed; ensuring the manufacturing production goals are met; managing the day-to-day operations of Hale O Laulima's packaging of manufactured marijuana products in accordance with State laws and regulations and Company standards; providing support for all packaging and processing employees including schedules, training, policy and



procedure updates, industry news, and product information; and the documentation and tracking of inventory control procedures and packaging and processing procedures.

3. Extractions Manager:

- a. Position Summary: Responsible for the oversight of production of all medical marijuana extractions; completing tasks assigned by the Processing General Manager to monitor and maintain the organization, cleanliness and efficiency of production area; maintaining quality control measures to ensure high quality product; carrying out day-to-day tasks; the monitoring and maintenance of the Production Facility extraction spaces in accordance with the State and standards set by Hale O Lahuli.

4. Extractions Agent:

- a. Position Summary: Responsible for the on-site support for the production of Hale O Lahuli's extraction-based products; completing tasks assigned by the Extractions Manager; maintaining quality control measures to ensure high-quality product; carrying out day-to-day tasks; the monitoring and maintenance of the extraction areas within the Production Facility in accordance with State regulations and standards set by Hale O Lahuli.

5. Production Manager:

- a. Position Summary: Responsible for managing the day-to-day operations related to marijuana product manufacturing at the Production Facility in accordance with state and local laws and regulations and Company standards; providing support for all packaging and processing staff, including schedules, training, policy and procedure updates, industry news, and product information; the documentation and tracking of inventory control procedures and all product manufacturing procedures.

6. Production Agent:

- a. Position Summary: Responsible for the on-site support for the production of Hale O Lahuli's manufactured marijuana products; completing tasks assigned by the Production Manager to monitor and maintain the organization, cleanliness and efficiency of production manufacturing areas; maintaining quality control measures to ensure high quality product; carrying out day-to-day tasks; the monitoring and maintenance of manufacturing areas at the Production Facility in accordance with the State and standards set by Company.

7. Packaging Manager:

- a. Position Summary: Responsible for the oversight of compliant packaging and labeling procedures in accordance with the Product Packaging and Labeling Plan; coordinating with the Processing General Manager to approve all packaging and



labeling materials; coordinating with the Inventory Manager to verify the validity of all labels prior to approving finished products for transport; conducting compliant disposal of all damaged, outdated, or incorrect packaging or labeling materials in accordance with the Disposal of Waste Materials Plan; ensuring that all labels generated by the inventory management system are in compliance with all labeling requirements; and assisting the COO and Inventory Manager in tracking products in the event of a product recall.

8. Packaging Agent:

- a. Position Summary: Responsible for the on-site support for the packaging and labeling of Hale O Lahuli's marijuana and manufactured marijuana products; completing tasks assigned by the Packaging Manager to monitor and maintain the organization, cleanliness and efficiency of production packaging and labeling areas; maintaining quality control measures to ensure high quality packaged products; carrying out day-to-day tasks; the monitoring and maintenance of packaging areas at the Production Facility in accordance with the State and standards set by Company.

Production – Shared

1. Transportation Manager:

- a. Position Summary: Responsible for all transportation of product between Hale O Lahuli's Production and Retail Dispensary Facilities; product transport to and from certified laboratories; ensuring compliance with all transportation procedures, as well as recordkeeping and reporting requirements; ensuring full compliance from all transportation employees conducting product deliveries; transportation and safety, including development of trip plans in accordance with data on high-risk geographies; ensuring Transportation employees training on transportation-specific topics; and supervision of all transportation employees.

2. Transportation Manager:

- a. Position Summary: Responsible for transportation of products between Hale O Lahuli's Production and Retail Dispensary Facilities, as well as product transport to and from certified laboratories; ensuring accuracy of orders and timeliness of deliveries; completion of deliveries in accordance with transport standards set by Hale O Lahuli; operating under the Transportation Manager through policies and procedures established by Hale O Lahuli and regulations of state and local governing bodies; contributing to the implementation of new or changing policies and procedures; strictly adhering to all traffic laws and acting as a courteous and safe driver; operating interdependently between the management and administration teams, under the supervision of the Transportation Manager.