



# Medical Marijuana Dispensary License Application

Department of Health, Office of Health Care Assurance

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

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

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

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

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

**Criteria 5. Capacity to meet the needs of qualifying patients**

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

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

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

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

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

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

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

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

**Total Merit Criteria Points Awarded to Applicant**

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

1. You can save your work on this form by checking the 'Save my progress and resume later' box and then clicking the 'Save form and resume later' button at the bottom of each screen. **IMPORTANT:** Remember to do this every time you leave your application or you will lose the information you have entered.
2. To keep your information secure, remember to log out of your application each time you finish working on it.
3. Use a current version of Google Chrome or Firefox browser when completing this form.
4. Save the form every 20 minutes to avoid timing out. When entering information in a spreadsheet, save and exit the form first.
5. Do not include single or double quote marks ( ' or " ) or more than one period ( . ) in your document names.

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

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

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

**MINIMUM REQUIREMENTS**

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

**INDIVIDUAL APPLICANT**

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

**APPLYING ENTITY**

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

**APPLICATION FEE**

The license application fee of \$5,000 by certified check or cashier's check payable to the State of Hawaii, Department of Health, is part of the minimum requirements and must be received at Depart Marijuana Dispensary Licensing, Room 337, 601 Kamokila Blvd., Kapolei, HI 96707 or be postmarked by 4:30 pm Hawaii Standard Time on the last day of the open application period January 29, 201

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

---

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

**SECTION A: APPLICATION FOR COUNTY**

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

---

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

---

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

---

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

---



**SECTION B: INDIVIDUAL APPLICANT INFORMATION**

**GENERAL INFORMATION**

---

3. Legal Name of Applicant Mr. Rueben Sung Je Oh

---

4. Upload Proof of Legal Name of Applicant

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

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

0 [REDACTED]

---

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

---



6. Upload Proof of Date of Birth of Applicant

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

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

1 [REDACTED]

7. Social Security No. or Identifier No. (last 4 digits only): [REDACTED]

8. Applicant's Address [REDACTED]  
United States

9. Daytime Phone No. [REDACTED]

10. Fax No. [REDACTED]

11. Email [REDACTED]

CRIMINAL HISTORY INFORMATION

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

13. Has the individual applicant ever been convicted of a crime? [REDACTED]

13a. If YES, please describe (e.g., conviction, date, disposition, etc.)

14. Has the individual applicant ever been arrested? [REDACTED]

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



Obtain a Criminal History Report

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

[Redacted]

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

15. Enter the eCrim Validation Code here:

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

consent

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

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

18. Upload Proof of Hawaii Residency:

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

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

[Redacted]

19. Authorized to Act on Behalf of Applying Entity

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

[Redacted]

SECTION C: APPLYING ENTITY INFORMATION

20. Name of Applying Entity

Mana Hale Hui, LLC

21. Applying Entity's Business Address

[Redacted]

United States

22. Entity Phone #

[Redacted]

23. Entity Email

[Redacted]

24. Entity Fax #


[Redacted]

---

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

---

26. Upload Applying Entity Incorporation or Business Status Documentation:

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

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

---

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


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

---

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

---

29. Hawaii Tax Identification Number:

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

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

---

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

---

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

---

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

---

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

---

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

---

---

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

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

Information to be provided:

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

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

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

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

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

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

**2) Other Businesses Holding an Interest**

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

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

---



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

[Redacted]

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

[Redacted]

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

[Redacted]

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

[Redacted]

2) Proof of Date of Birth

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

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

[Redacted]



3) Proof of Hawaii Residency:

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

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

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

SECTION D: FINANCIAL INFORMATION

36. FINANCIAL RESOURCES GENERAL INFORMATION

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

Information to be provided:

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



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

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

Upload the completed Financial Resources General Information Spreadsheet

37. Upload Financial Resources General Information Supporting Source Documents

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



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



---

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

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

Data to be provided:

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

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



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

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

Upload the completed Financial Resources - Retail Dispensing Location Information Spreadsheet

---

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

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



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

---

**SECTION E: MERIT INFORMATION - OPTIONAL**

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

---



- 
- (1) Ability to operate a business, including but not limited to education, knowledge, and experience with:
- (A) Regulated industries;
  - (B) Agriculture or horticulture;
  - (C) Commercial manufacturing;
  - (D) Pharmaceutical companies;
  - (E) Operating or working in a medical marijuana dispensary business;
  - (F) Creating and implementing a business plan, including a timeline for opening a business;
  - (G) Creating and implementing a financial plan;
  - (H) Retail sales;
  - (I) Secure inventory tracking and control;
  - (J) Protecting confidential customer information;
  - (K) Owning or managing a business that required twenty four hour security monitoring; and
  - (L) Any other experience the applicant considers relevant;

0 [Redacted]

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

Upload Response to (1)

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

0 [Redacted]

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

Upload Response to (2)

- 
- (3) Proof of financial stability and access to financial resources, including but not limited to:
- (A) Legal sources of finances immediately available to begin operating a dispensary;
  - (B) A summary of financial statements in businesses previously or currently owned or operated by the applicant;
  - (C) A financial plan for operating a medical marijuana dispensary in Hawaii;
  - (D) Good credit history; and
  - (E) History of bankruptcy by the applicant or entities owned or operated by the applicant;

0 [Redacted]

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

Upload Response to (3)

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

0 [Redacted]

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

Upload Response to (4)

---



---

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

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

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

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

(D) Measuring and improving customer satisfaction;

0 [REDACTED]

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

Upload Response to (5)

---

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

0 [REDACTED]

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

Upload Response to (6)

---

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

0 [REDACTED]

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

Upload Response to (7)

---

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

0 [REDACTED]

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

Upload Response to (8)

---

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

0 [REDACTED]

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

Upload Response to (9)

---

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

0 [REDACTED]

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

Upload Response to (10)

---



---

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

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

[Redacted]

Upload Response to (11)

---

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

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

[Redacted]

Upload Response to (12)

---

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

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

[Redacted]

Upload Response to (13)

---

**SECTION F: CERTIFICATION AND SUBMITTAL**

**Certification**

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

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

**Applicant Name**

Mr. Reuben Sung Je Oh

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

**User ID**

[Redacted]

**User Email**

[Redacted]

---

Entry Info

**Date Created**

[Redacted]

**Date Updated**

**IP Address**

---



FILED 09/22/2015 11:31 AM  
Business Registration Division  
DEPT. OF COMMERCE AND  
CONSUMER AFFAIRS  
State of Hawaii



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



09/23/201520087

### ARTICLES OF ORGANIZATION FOR LIMITED LIABILITY COMPANY

(Section 428-203, Hawaii Revised Statutes)

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK

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

I

The name of the company shall be:

Mana Hale Hui LLC

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

II

The mailing address of the initial principal office is:

[Redacted address]

III

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

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

Reuben Oh

(Name of Registered Agent)

Hawaii

(State or Country)

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

[Redacted address]

IV

The name and address of each organizer is:

Timothy Lay

Malcom Morrison

Reuben Oh

[Redacted organizer addresses]

The period of duration is (check one):

At-will

For a specified term to expire on: \_\_\_\_\_  
(Month Day Year)

V

The company is (check one):

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

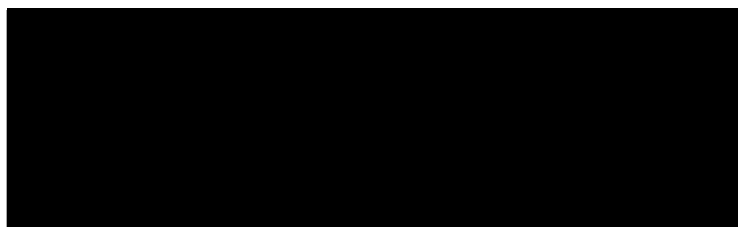
b.  Member-managed, and the names and addresses of the initial members are listed in paragraph "c".

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

Timothy Lay

Malcom Morrison

Reuben Oh



VII

The members of the company (check one):

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

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

Shall be liable for specified debts, obligations and liabilities of the company **as stated below**, and have consented in writing to the adoption of this provision or to be bound by this provision.

We certify, under the penalties set forth in the Hawaii Uniform Limited Liability Company Act, that we have read the above statements, I am authorized to sign this Articles of Organization, and that the above statements are true and correct to the best of our knowledge and belief.

Signed this 22 day of September, 2015

Reuben Oh

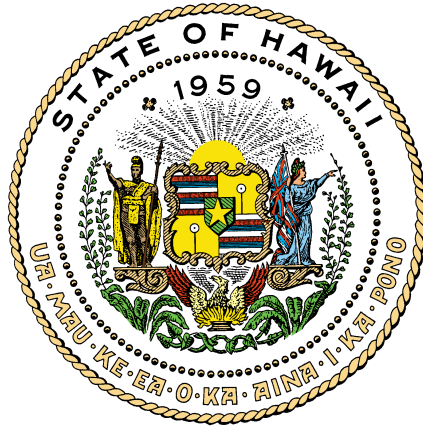
(Type/Print Name of Organizer)

(Signature of Organizer)

(Signature of Organizer)

SEE INSTRUCTIONS PAGE. The articles must be signed and certified by at least one organizer of the company.





## Department of Commerce and Consumer Affairs

### CERTIFICATE OF GOOD STANDING

I, the undersigned Director of Commerce and Consumer Affairs of the State of Hawaii, do hereby certify that according to the records of this Department,

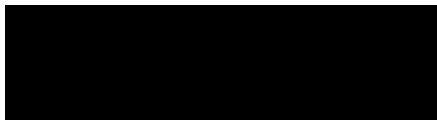
MANA HALE HUI LLC

was organized under the laws of the State of Hawaii on 09/22/2015 ; that it is an existing limited liability company in good standing and is duly authorized to transact business.



IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of the Department of Commerce and Consumer Affairs, at Honolulu, Hawaii.

Dated: January 29, 2016



Director of Commerce and Consumer Affairs



## **QUESTION 1 – ABILITY TO OPERATE A BUSINESS**

Mana Hale Hui, LLC's management team has operated in the highly regulated medical marijuana industry since 2009. Through the years, we have accumulated extensive industry knowledge and experience managing and operating large scale commercial manufacturing production facilities, as well as operating eleven state compliant dispensaries in California and Colorado. Our key team members possess the relevant knowledge and experience in point of sale software, seed to sale tracking, inventory management, data analytics, packaging and labeling, potency, microbial and pesticide testing, security, and other industry best practices to guarantee success in the state of Hawaii.

**Education:** Our management team brings a diverse educational background with graduate degrees in botany, horticulture, law, business management and finance, pharmacy, technology management and product development. These varied skillsets have enabled us to develop extensive written Standard Operating Procedures touching on all aspects of legal compliance, marijuana production processes, retail sales, secure inventory tracking controls, protecting confidential patient information, disposal of green waste, security, and testing.

**A. Regulated Industries:** Our operational experience in California and Colorado's regulated markets has led to a proficiency in pesticide, potency, and microbial testing, licensure maintenance, tax payment requirements, vertically integrated businesses, and operational compliance. We actively participate in stakeholder working groups, engage with various state agencies, and lead several industry trade associations to assist with crafting rules and regulations under which the industry operates. Our compliance department is proactive with ever changing rules and regulations. Thus, we are well positioned to succeed in Hawaii's regulated environment.

**B. Agriculture/Horticulture:** Along with our experience cultivating medical grade marijuana, we have specific expertise in commercially growing and distributing fresh produce as well as building our commercial agricultural warehouses. Coupled with our team's horticultural and agricultural education, this has enabled us to produce widely recognized and consistent, high quality marijuana products including over 50 different strains of marijuana flower, some of which are award winning strains (Bruce Banner #3, 2013 Medical Marijuana Cup Winner; High Times ® Top Strain of All Time, Bruce Banner #3, High Times ® 2013 Top 40 Strains, Tiger's Milk). Our lead horticulturalist received his B.A. in botany from the University of Iowa and his Masters of Science in microbial ecology from the University of Denver. Prior to working in the marijuana industry, he focused his attention on commercial agriculture production. In addition to this background, we bring extensive knowledge in state of the art lighting practices, soil mediums, plant nutrients, and irrigation and harvest techniques to the indoor growing process through various agricultural and botany experts. We maintain the cleanest, safest, highest quality standards in the states in which we operate, and will bring these standards to Hawaii. Specifically, we will implement rigorous sanitation procedures for cleaning and sanitizing all areas of our production center, including walls, floors, lights, and pots prior to each successive planting. In addition, we will clean and sterilize all trimming tools and equipment throughout the day and at the end of each work shift to inhibit microbial pathogen growth. Further, all incoming fresh air to the production center and recirculated air will be filtered and/or sterilized using UV lighting to reduce the risk of airborne contaminants.

**C. Commercial Manufacturing:** Our management team also boasts over 30 years of commercial manufacturing experience. Specifically, our key personnel has expertise in the highly regulated medical device manufacturing and pharmaceutical product development

industries. Our own experience in cultivating marijuana has resulted in producing over 10,000 pounds of recreational and medicinal marijuana in the last twelve months alone.

**D. Pharmaceutical Companies:** In addition to our experience in the pharmaceuticals industry, we have begun to identify potential candidates for an on-site pharmacist as our Clinical Director. This individual will provide counsel and guidance on the pharmacology and active compounds of medical marijuana and offer our patients the accurate and reliable information they require. The Clinical Director will share his or her knowledge by providing training to dispensary staff who will intelligently discuss how and why different strains provide relief for a myriad of physical ailments.

**E/H. Operating in a medical marijuana dispensary business/Retail sales:** Our management team has successfully managed eleven different dispensary locations for the last six years, routinely serving over 4,800 customers weekly for annual sales of over [REDACTED]. Our cultivation team has designed, built out and managed over 300,000 square feet of indoor cultivation space. We have created efficient conditions, including top-of-the-line nutrient plans, standardized feeding regimens, sophisticated irrigation systems, and strictly enforced, weekly harvest schedules to ensure a reliable product for our patients. This quality and dependability enables us to consistently provide an adequate supply of medicine.

**F. Creating and implementing a business plan:** We have a vetted project plan to ensure we successfully open our dispensaries and cultivation facilities in a timely manner. This project plan includes permit and licensure timelines, facility design and construction requirements, production materials acquisition, and financial monitoring. We have successfully undertaken this approach on 14 separate occasions and rely on our PMP certified Project Manager to ensure that we monitor our milestones, track our budget, and address and resolve issues as soon as they

arise. Assuming that the license is issued on April 15, 2016, we expect our dispensary and production facilities to be operational on or about August, 2016.

**G. Creating and implementing a financial plan:** Our six years' experience is a testament to our ability to implement and manage financial plans successfully. These plans include monthly and annual detailed expenses and projected revenues for three years. We will conduct monthly and quarterly variance analyses to ensure discrepancies to the budget are identified and rectified promptly.

**I. Secure Inventory tracking:** BioTrackTHC is the cornerstone of our recordkeeping program and has been our preferred point of sale system for the last six years. The system enables us to collect, store and retrieve all data and activity pertaining to inventory and transfer records, laboratory testing, patient records, employee records, recall reports, quarantine and waste reporting, and sales and transaction records in real time. BioTrackTHC records every plant grown in our production center and follows the chain of custody of each plant from the time it is propagated until it is sold to a qualifying patient. Our experience using BioTrackTHC puts us in a prime position to easily and strictly comply with the audit regulations provided by the Hawaii State Department of Health. Each day's beginning inventory, harvests, sales, disbursements, green waste disposal, and ending inventory is recorded. Since BioTrackTHC is a cloud-based system, all data is frequently backed up and securely stored for the appropriate retention period.

**J. Protecting confidential patient information:** We are intimately familiar with state and federal regulations requiring us to maintain the privacy of our patients. Medical marijuana dispensaries fall under the auspices of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), and are required to keep confidential all the protected health information that is

collected during a patient's transaction. With this in mind, we have carefully crafted Standard Operating Procedures, including best practices, which guide our employees on how to handle our patients' privacy and abide by HIPAA. As part of these procedures, all qualifying patient records must be kept from loss, damage, or unauthorized use. All electronic patient records will be secured on an encrypted system and backed up on a regular basis to prevent loss due to fire, flood, or other natural disasters.

**K. 24-Hour security monitoring:** We understand the absolute need for robust security protocols and currently employ compliant best practices. We will utilize a security and video surveillance system in our production centers and dispensaries, which will operate 24/7/365. As we have done in other jurisdictions, we will engage a security monitoring service provider who will immediately notify us of any triggered alarms. In addition, the selected security system will be required to detect power loss. Immediate notification will occur if power is lost. Back-up power sources, including battery systems capable of providing power for 48-72 hours, will also be incorporated ensuring around the clock security of all production centers and dispensary locations.

Successful operations, profitability and providing consistent product to a wide range of patients is dependent upon a clear, strategic understanding of the marijuana industry. Our proven success in all aspects of regulatory compliance, agriculture and horticulture processes, commercial manufacturing, pharmaceutical knowledge, dispensary operations, business and financial planning, retail sales, inventory tracking, patient confidentiality, and strict security protocols exemplifies that we have the skills, knowledge, financial resources and ability to operate successfully in Hawaii.

## **QUESTION #2 – PLAN FOR OPERATING A MEDICAL CANNABIS RETAIL DISPENSARY**

As part of Mana Hale Hui, LLC's plan of action in preparing to open and operate a state licensed medical marijuana dispensary in Honolulu County, we have created a detailed project plan described below. The management team brings six years of industry experience in operating highly successful medical marijuana dispensaries in Colorado and California utilizing the following plan for both our retail dispensing and marijuana production locations.

**1. Timeframe:** Based on our management team's practical knowledge of the marijuana industry, we have fully developed project plans to ensure our retail dispensing locations in Honolulu open in a timely manner. Mana Hale Hui's management team will engage a PMP certified Project Manager who will monitor our progress, track our budget as well as address and resolve issues as soon as they arise. Design and building plans are complete and groundbreaking will commence April 16, 2016. Based on our milestones and timeframes which we have attached in our response to this Question, we estimate that we will be able to start dispensary operations by August, 2016.

**2. Selecting Retail Dispensing Locations:** Central location and safe access is critical to ensure that patients' medical needs are met. The management team has secured leases for our retail dispensing and cultivation locations, which comply with the zoning requirements pursuant to Section 329D-22. Local general contractors have been awarded our contracts to ensure timely build out once the license is approved.

**3. Design:** Mana Hale Hui's management team is currently operating eleven high-end retail dispensaries in both California and Colorado. Our model creates a secure, friendly environment for our patients in a contemporary, professional pharmacy-like setting. We will



ensure ADA compliance for our disabled customers throughout the facilities. We will also safeguard that pedestrians cannot inadvertently see medicinal products as they pass our location. All necessary improvements will be made to our locations to maintain well-lit parking lots and safe building access. Per Section 329D-6 (o) (2) and 329D-7 (14), our signage will comply with the size limitation of 1600 square inches and will only bear the typewritten dispensary name.

The management team will coordinate closely with the general contractor throughout the remodel of the interior of the dispensaries to move any walls, build secure rooms, install safes, implement any upgrades needed to meet applicable codes and regulations from the local jurisdiction, and obtain certificates of occupancy. Per Section 329D-6 (i), no less than 60 days prior to opening for business, we will provide to the Department the addresses, tax map key numbers and copies of the premises' leases for our retail dispensing locations.

**4a Location Security & Monitoring:** Once the production center and retail dispensary build outs are completed and operational, on-site security measures will be employed. Our armed security guards and armed transport officers will be screened for hire, interviewed, and trained for duty in consultation with retired law enforcement consultants. All security guards will be employees of Private Security Group, Inc, however we intend to utilize the expertise of retired law enforcement officers to advise our Director of Security regarding training, efficiency, compliance and other aspects of our security operations.

**4b Transportation Security:** The shipping manifest that Private Security Group, Inc uses will be created within BioTrackTHC, which is also our point of sale and production tracking system, and will include the origination and destination of all products, a description of the products being transported (type, quantity, and tracking number), and a designated route of transport.

**4c Internal Office Security:** Mana Hale Hui's management team uses several other systems to assist in our operations. For example, "Securisync" is an encrypted file sharing database where all the operations, compliance and security manuals, training manuals, standard operating procedures, emergency protocols, employee rosters and all other relevant handbooks will be stored. This system will be hosted on our private secure server and backed up hourly. We also utilize an employee time and attendance tracking system and will incorporate an email system as well.

**5 Hiring and Training Personnel:** We will hold prospective staff interviews before our retail dispensaries open to evaluate the available local labor pool. This approach has proven to be extremely successful. As per Section 329D-12, all of our prospective employees will comply with the requirement to undergo full background checks and fingerprinting.

Our staffing plan includes sending our Colorado based Training Team to Hawaii to provide two weeks of classroom and hands on schooling. The first three days of training will include industry basics, retail standard operating procedures, Hawaii rules and regulations, cannabis basics (ie: sativas, indicas, hybrids, terpenes, cannabinoids, etc), cultivation basics, compliance training, consumption methods, hemp, strain characteristics, and inventory point of sale training. The next seven days will be spent in simulated retail dispensary environments, getting hands on experience with opening and closing procedures, daily checklists, inventory operations, daily audit procedures, retail cash transaction protocols, patient check in and validation, upselling techniques and inventory point of sale processes. The ability to simulate a real-time retail dispensary environment will unquestionably result in better educated, more prepared and knowledgeable staff upon opening.

**6. Patient Outreach Program:** Prior to opening our dispensaries, we will conduct educational seminars for the local community and its registered medical patients, utilizing our proprietary Consume Intelligently® public education platform informing patients about tolerance, dependence, withdrawal and substance abuse, warnings about driving and operating mechanical equipment, genus of cannabis, different consumption methods, the difference between THC and CBD, and the difference between medicinal use and recreational use. The campaign is aimed at providing guidance to both novice and experienced medical patients regarding responsible consumption of marijuana and marijuana infused products.

**7. Back Office Operations:** In addition to the launch of the retail dispensaries, we will also be setting up the back office departments critical to ensuring the continued success of the business venture. These protocols have already been developed and employed by our management team in other jurisdictions. Specifically, the management will establish an HR department and set up the necessary systems to support attendance tracking, payroll and insurances. We will create an IT/Network department that will install a private server, network or VPN across the retail dispensary and production centers, and set up the security and DVR recording systems across all operational locations. We will also establish our Legal and Compliance department to maintain our library of Standard Operating Procedures, acquire and maintain required permits and licenses, establish sanitation and green waste removal protocols and relationships, coordinate NCEC certified testing for potency, pesticides and microbials, and ensure timely compliance with any changes to state or local regulations. Our Compliance department will register with the Narcotics Enforcement Division and provide quarterly sales and inventory reports per the Department of Health's requirements and requests. Further, we will create an Accounting department and train new employees on best practices regarding taxes,

cash management, banking solutions, vendor payments and payroll. Lastly, we will annually generate an independent financial audit for each retail dispensary and production center that will be submitted to the Department.

**8. Quality Assurance Dispensing Plan:** The management team will dispense only the highest quality medical marijuana products distinguished by consistency, safety, and efficacy. We achieve such goals by applying these principles in our marijuana production center using the highest standards, the most experienced quality cultivators, and pharmaceutical grade manufacturing practices. It is our intention that the marijuana production processes be free from any defects or errors that may impact the dispensing process.

The management team has taken into careful account the severe and debilitating or life threatening conditions as set forth in the Hawaii Medical Marijuana Program and has researched specific cannabinoid profiles to match with patient ailments.

The company has selected twelve marijuana strains for initial production because of their effectiveness as a medication, their historically stable genetics and their consistent potency levels. In addition, Mana Hale Hui's management will offer the following methods of administration or medication: sublingual tinctures, metered oils, exact dosage capsules or lozenges, transdermal patches, ointments and skin lotions.

**QUESTION 3 – PROOF OF FINANCIAL STABILITY AND ACCESS TO FINANCIAL RESOURCES**

Mana Hale Hui, LLC (MHH) was specifically formed and registered with the Department of Commerce and Consumer Affairs for this undertaking. We are confident in our ability to meet the requirements of proving access to sources of finances, developed financial statements, vetted financial plans and a good credit history.

**A. Legal sources of finances immediately available to begin operations:** As indicated in the attached [REDACTED], we have satisfied HRS §329D-3 (2) (f) [REDACTED]  
[REDACTED]  
[REDACTED].

**B. Financial Statements:** MHH was formed September 30, 2015 to support our Hawaii venture. [REDACTED]  
[REDACTED] As this is a new business, there are no historical business financial statements to provide. [REDACTED]  
[REDACTED]

[REDACTED] However, MHH’s management team has six years of extensive and diverse experience in both the California and Colorado marijuana industry.

**C. Financial Plan for operating a medical marijuana dispensary:** MHH’s management team has extensive experience developing and executing comprehensive financial plans in the medical marijuana industry, and have previously prepared and executed fourteen such business plans. Our six years’ experience is a testament to our ability to implement and manage to those financial plans successfully. We have engaged a certified Project Manager to

monitor all expenditures during the construction and development phases of our retail dispensing operation in order to ensure we remain under budget. Once our operations commence, our Accounting Department will be just as diligent in monitoring our cash flow on a day to day basis. Our detailed financial plan is provided as an attachment to this question.

**D. History of bankruptcy:**



**QUESTION 4 – ABILITY TO COMPLY WITH SECURITY REQUIREMENTS**

Mana Hale Hui, LLC’s management has over six years of experience managing cultivation and dispensary facilities in both California and Colorado. We have an extensive library of Standard Operating Procedures, which cover best practices in cultivation and dispensary operations, specifically including security measures. Our security procedures and dispensary operating procedures and rules have been individually tailored to comply with HRS §329D-7.

Along with the privilege a license provides to cultivate and dispense medical marijuana comes and the corresponding need to prevent the diversion, theft, and underage sale of medical marijuana. We also are aware that cultivation and dispensary locations can be potential targets of crime and require robust security procedures. Our employee handbook is very specific on the penalties for diversion by an employee. Specifically, an employee found to have taken product out of the cultivation facility for any reason other than what is specifically provided for in our Standard Operating Procedures and or state and local laws, is cause for immediate dismissal and referral to local law enforcement. Our employees are also instructed that failure to report conduct that could lead to diversion or theft of product will also lead to termination. Our goal is to deter crime not only from outside influences, but also internally with our own employees.

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]









## **QUESTION 5 – CAPACITY TO MEET THE NEEDS OF QUALIFYING PATIENTS**

Mana Hale Hui’s management team boasts over six years of experience managing large-scale cultivation and dispensary facilities in both California and Colorado. We have been widely recognized for our consistent, high quality products and patient services. Our expertise enables us to grow over [REDACTED] of a wide variety of high quality marijuana, including [REDACTED] strains with extremely high levels of CBD. Our proprietary strains have been tested by licensed potency laboratories resulting in a valuable index of an array of cannabinoid profiles found in the marijuana.

**A. Educating patients:** We understand that the ability to produce high quality medicine is just one step in being a responsible and successful operator. Patients must be educated patients on a wide range of information concerning medical marijuana, various consumption methods and its use in the treatment of Hawaii’s permitted ailments and issues. Our management team’s supported Colorado and California dispensaries are highly regarded due in large part to the comprehensive education provided to patients. Our employees will undergo in depth training on the various types of marijuana, the medical benefits of the cannabinoids, the benefits of specific consumption methods, and possible side effects.

We strongly believe in educating the general public and medical patients alike on the advantages and disadvantages of various types of marijuana use and when it should not be used at all. This is evident in our instituting of a proprietary education campaign, Consume Intelligently®, which our management team launched in Colorado over a year ago. The Consume Intelligently platform is a multi-media public education campaign providing guidance to novice and experienced patients on the responsible consumption of medical marijuana and

manufactured medical products. Over the last year, Consume Intelligently information has been disseminated by numerous dispensaries in Colorado and has been adopted by a local jurisdiction and is a widely used public information campaign. Understanding that HRS §329D-10(a) limits the types of marijuana products that may be manufactured and distributed, we will customize this educational platform to be consistent with Hawaii's regulations. While not a revenue-generating endeavor, we take great pride in knowing that we can aid in the public discussion on the responsible use of medical marijuana.

As a commitment to our qualified patients, we have identified an on-site pharmacist as our Clinical Director. His insight and contribution will significantly improve the service provided to our patient/customers. Our pharmacist will be required to remain on the cutting edge of marijuana research and scientific developments pertaining to the efficacy of medical marijuana, the improvements it may bring to the lives of patients, substance abuse prevention, as well as any potential drug interactions of which they need to be aware.

Our Clinical Director will provide information on pharmacodynamics, or the biochemical and physiological effects of medical marijuana on the body. The relationship between drug concentration and effect is essential because our patients look to our registered dispensary agents to educate them on appropriate dosages, correct strains, and preferred consumption methods for the issues they are experiencing. One of the most critical responsibilities of our Clinical Director will be to identify how cannabinoids interact with other drugs. Drug interactions can quickly become a consumer safety issue, and we are committed to take this aspect of the business very seriously. Because marijuana is still classified as a Schedule 1 drug, until recently very little research has been done on its interactions with other drugs. Therefore, staying abreast of scientific research and developments is of the utmost importance. Patients will be encouraged to

meet with our Clinical Director on each visit to our dispensary. They will discuss their specific health issues, symptoms and other drugs currently being taken. Our Clinical Director will enter all this information into the patient's profile so that dispensary agents can easily reference it with each subsequent patient visit.

With the introduction of any new medicine, comes the possibility for a new avenue of drug addiction within our community. We are cognizant about the possibility of over use and the lack of guidance, support or patient advocacy which could leave the window for drug addiction wide open. We are dedicated to working with the state and local government, as well as with outreach and drug rehabilitation programs to mitigate the possibility of the recommended or prescribed medicinal marijuana to be abused in any fashion.

We have a rigorous training program which enables our registered dispensary agents to provide the most up to date information on all the medical marijuana products offered, their cannabinoid components, recommended strains and dosages, and preferred consumption methods. We pride ourselves on the training provided to registered dispensary agents and require ongoing education and training as the science behind medical marijuana develops more fully.

**B. Producing and maintaining an adequate supply:** We are confident in our ability to consistently produce and maintain a dependable supply of medical marijuana to meet the ranging needs of our patients. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

marijuana products. [REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Through comprehensive understanding of the science behind medical marijuana and the commitment to stay up to date on a constantly evolving knowledge-base, we are keenly situated to both cultivate and dispense high quality, ailment specific marijuana. We utilize state-of-the-art cultivation facilities with techniques and processes that generate the finest soil-based grown marijuana in the state of Colorado and California. We put into production only the fastest-growing and highest-yielding strains to maximize every square foot of cultivation space. And we focus our efforts on producing the highest THC, CBD, and CBG plants to meet the diverse needs of our medical marijuana patients.

**C.Providing safe, accessible retail dispensing locations:** In addition to our cultivation and scientific expertise, we are proficient in the management of numerous dispensaries in both California and Colorado. We understand the importance of choosing a dispensary site which is safe and easily accessible. Determining the balance between accessibility, appeal and location safety is critical to ensuring that patients feel comfortable returning time and again to our establishments. We will ensure we will be ADA compliant to accommodate our disabled patients. In addition, we will ensure our locations are well lit and use security protocols such as

motion detection sensors, a “man-trap” ante-room and on-site security personnel to maintain the safety not just of our product, but especially of our customers.

**D.Measuring and improving customer satisfaction:** We are constantly trying to improve our customer service in order to increase customer satisfaction. We intend to measure customer satisfaction via personal feedback, increasing sales and patient surveys and reviews. As mentioned earlier, we believe that our employee training and inclusion of an on hand pharmacist as our Clinical Director will greatly benefit our patients by providing quality recommendations and education regarding their marijuana purchases. In addition, we will incorporate bonus opportunities for dispensary managers and product consultants who successfully increase the numbers of new and returning patients to their dispensary, as well as surpassing specific benchmarks of daily or weekly sales levels. Our consultants will ask returning customers how their previous purchase experience was in order to improve customer satisfaction.

Our dispensaries will offer a very comfortable design environment much like a neighborhood pharmacy. Patients go through a thorough check in process to assure they are legally compliant. Patients are encouraged to spend as much time as they need to review and learn about all the medicines offered and the variety of consumption methods available. This patient-first attitude illustrates how we view success.



**QUESTION 6 – ABILITY TO COMPLY WITH BACKGROUND CHECK REQUIREMENTS**

Mana Hale Hui’s management team has already complied and passed state mandated background checks and protocols in California, Colorado, Oregon, Maryland, Nevada and Illinois. We have also passed background checks in numerous local jurisdictions. We are keenly familiar with Hawaii’s regulations requiring all applicants, licensees, employees, all officers, directors, subcontractors and their employees, and any person permitted to enter and remain in dispensary facilities and production centers pursuant to HRS §§329D-15 (a) (4) or 329D-16 (a) (3) to undergo background checks and fingerprinting. In addition, we shall have written policies and procedures on conducting and maintaining background checks on all persons mentioned in HAR §11-850-17 (a). We have included a copy of our Standard Operating Procedure addressing this requirement as an attachment to this question’s response. We will not consider employing any person whose criminal background history would be an impediment to our successful licensure or continuing operations.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**QUESTION 7 – ABILITY TO COMPLY WITH THE REQUIREMENTS FOR INVENTORY TRACKING, SECURITY, AND SALES LIMITS FOR QUALIFYING PATIENTS**

Mana Hale Hui, LLC’s management team has over six years of experience managing cultivation and dispensary facilities in both California and the heavily regulated state of Colorado. We have an extensive library of Standard Operating Procedures which cover best practices in all facets of inventory tracking, inventory security and the strict monitoring of sales limits for qualified patients.

**1. Inventory tracking** We have broad experience using a comprehensive and sophisticated inventory tracking system called BioTrackTHC, the same system which was recently awarded the contract for monitoring marijuana inventory across the State of Hawaii.

**1a. Inventory tracking at the production centers:** The BioTrackTHC software tracks each individual plant from seed to sale. We tag each plant with a unique sixteen digit non-repeatable identifier that remains with the plant from the point it is cloned from the mother plant until it is processed for transfer to the dispensaries. This tagging system enables us to track the strain of the plant, the room in which it is located, and whether it was destroyed mid-cultivation. We are also able to track when plants are watered and when they are fertilized. This software provides real-time tracking of individual plants’ harvest dates, and anticipated drying, curing, and trimming timelines. We can use the system to track green waste at numerous points throughout the lifecycle of the plant such as during pruning, harvest, destemming and trimming and then adjust our inventory levels accordingly. The BioTrackTHC system is able to record when we transfer samples to a laboratory for testing potency, contaminants and microbials and enables us to retain copies of the resulting test certificates. We can determine which packages

individual plants were included in and to which dispensary locations they were sent. A highly skilled and trained team of data analytics experts, who are proficient in the BioTrackTHC system, will manage this tracking.

**1b. Inventory tracking at the retail dispensing locations:** BioTrackTHC enables the dispensaries to collect, store, and quickly retrieve all activity related to retail inventory, patient records, individual transaction details, and summarized sales on a monthly and annual basis either in total or by product type. The system will ensure that any of our products can be identified, located and recalled due to a detected anomaly in our products based on a customer complaint or any other incident related to a health safety or quality risk.

**2. Inventory security:** Our established Standard Operating Procedure documents focus heavily on protocols intended to secure our products during transport from the processing centers to the dispensaries.

**2a. Loss prevention and diversion at the production centers:** In addition to being an invaluable tool in tracking the lowest level of inventory detail, BioTrack also enables us to keep tight controls on product inventory at every step of the process, and virtually eliminates all product diversion or theft. At the production center, we require weekly plant count audits of all plants in the clone, vegetative and flower rooms. During our harvests, we perform a blind audit to ensure that every plant is accounted for as it is moved to the drying room. And finally, we perform bi-weekly audits in our processing room of all packages waiting to be transported to our dispensaries.

**2b. Loss prevention and diversion at the dispensaries:** At the dispensaries, we perform three audits daily of all inventory at the facility, whether held in the safe room or placed

in the display cases. Inventory audits are taken when the store opens, when there is a mid-day shift change and again at closing. Results of the audits are entered into BioTrackTHC and can be referenced easily in the event of an announced or unannounced inspection.

**2c. Security and maintaining the chain of custody:** We have engaged a security transport vendor named Private Security Group, Inc who will utilize tamper evident, opaque bags to transport shipments of marijuana product from the production centers to our retail dispensing locations.

BioTrackTHC generates manifests which include the details of the marijuana shipment from the production center to the retail dispensing location. These details include the name and address of the production center, a shipment identification number, the gross and net weight and description of each individual package that is part of the shipment, the total number of individual packages, the name of the employee who prepared the shipment for transport, the date and time of preparation, the date and time of when the security transport driver is expected to pick up the shipment, the name of the driver taking custody of the shipment, the driver's license number, the make and model of the GPS equipped delivery vehicle, the directions that the driver will follow, the approximate time that the shipment should arrive at the dispensary, and the name and address of the receiving dispensing location.

Upon receipt of the package from the driver, our dispensary manager will continue the chain of custody by logging the shipment into BioTrackTHC and take physical custody of the shipment. The dispensary manager will confirm that the packages were secure, undamaged and appropriately labeled when received. After confirming the weight of the packages, the dispensary manager will then countersign the delivery manifest, retain a copy for our records, and provide the original back to the security driver. The dispensary manager will record the date

and time they took custody of the package into BioTrackTHC. Upon receipt, the packages will be segregated, visually inspected for quality control, and released in BioTrackTHC as available inventory and stored in our secure room until needed in the dispensing area.

**2d. Qualifying patients and ensuring sales limits:** Our six years of successful compliance has helped us become accustomed to recognizing and validating our patients' marijuana license certificates. 329 cards will be rejected if any part is illegible, altered or erased. If the card is torn in two or more pieces, it will be rejected. We also equip and train our dispensary employees on how to reference and use a Drivers' License and State ID Validation Book, use ID card scanners and visually detect fraudulent identification or state-registry cards. Our employees are also trained on how to politely refuse service to non-qualified patients.

If the 329 card is accepted, our dispensary staff will update our inventory system in an effort to maintain a "real-time" balance of the amount of medical cannabis approved and available for purchase by each qualifying patient. We will add information for each new patient that comes to our dispensary. We recognize that qualifying patients shall be allowed to purchase no more than four ounces of marijuana within a consecutive fifteen day period, or no more than eight ounces of marijuana within a consecutive thirty day period. With this in mind, we are cognizant of the fact that patients may visit separate, unrelated dispensaries in an attempt to circumvent these quantity limitations, and we are committed to prevent these unauthorized purchases through real time patient purchase reconciliations.

**QUESTION 8 – ABILITY TO MAINTAIN THE CONFIDENTIALITY OF A QUALIFYING PATIENT’S MEDICAL CONDITION, HEALTH STATUS, AND PURCHASES OF MARIJUANA OR MANUFACTURED MARIJUANA PRODUCTS**

Mana Hale Hui, LLC’s experienced management team is intimately familiar with state and federal regulations requiring us to maintain the privacy of our patients. We are cognizant of the fact that medical marijuana dispensaries fall under the auspices of the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and are required to keep confidential all of the protected health information collected during a patient’s transaction. Indeed, we understand and are sensitive to the fact that under HIPAA medical marijuana is treated almost exactly as any other prescription or treatment. With this in mind, we train our employees using an extensive library of carefully crafted Standard Operating Procedures, including best practices, which guide our dispensary staff on how to handle our patients’ privacy and abide by HIPAA.

Like any controlled substance, medical marijuana requires a robust patient verification system to ensure patients who are receiving prescribed marijuana are properly identified. Upon validation of his or her credentials, a patient is escorted through a locked door separating the “man-trap” anteroom from the actual dispensing area. We do not allow more than one person per employee into this area for several reasons. It enables our employees to closely monitor each patient without distraction. But more importantly, it ensures that each patient receives our undivided attention and that their information remains private from other customers.

We have extensive experience with a comprehensive and sophisticated inventory tracking system called BioTrackTHC. Not only does BioTrackTHC capture the details of every plant from seed to sale, but it also enables us to capture information on our patients. We are able to include our patients’ medical conditions into their account records. This is an invaluable tool so

that when patients return, our dispensary staff can access their records and immediately counsel them on products specifically geared to assist with their individual needs. Since every transaction is recorded via employee pin or biometric fingerprint in BioTrackTHC, we can easily monitor and hold dispensary staff accountable for accessing patient information appropriately. Dispensary staff who are not responsible for patient intake, patient care or patient administration will not be given access to patient personal health information. Any employee discovered disclosing or improperly using confidential patient information will be subject to immediate termination.

All electronic patient records will be secured and backed up to a private server database regularly to prevent loss of information due to fire, hurricane or flood. The servers and electronic devices on which BioTrackTHC records are stored will be encrypted at the operating system level to ensure compliant protection of patient information.

**QUESTION 9 – ABILITY TO COMPLY WITH THE REQUIREMENTS FOR CERTIFIED LABORATORY TESTING ON MARIJUANA AND MANUFACTURED MARIJUANA PRODUCTS**

Mana Hale Hui's management team's supported cultivation operations in Colorado have compliantly adhered to extensive potency, contaminant, microbial and pesticide testing over the course of the last eighteen months. To accomplish this same level of testing compliance in Hawaii, we will select state certified laboratories, pursuant to HRS §329D-8, to provide a variety of testing services. We will select and use an independent testing laboratory which is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement.

A statistically representative sample of each harvest batch or lot of manufactured marijuana product will be collected, and tested before release to the retail dispensing locations. We will adhere to the testing requirements of the Department of Health, including any additional testing procedures unique to Hawaii. In addition, we plan to actively participate in any stakeholder working groups to provide valuable insight and comment on what we have found to be workable procedures in other states.

All marijuana product out for testing will be segregated in a designated area of the facility until results from the lab indicating that the potency, microbial, or pesticide results are within acceptable limits. Mana Hale Hui's management team currently operates in a market requiring potency, microbial and pesticide testing for much of the marijuana produced. As such, we are intimately familiar with the stringent testing requirements and the internal protocols necessary to ensure the uninterrupted flow of compliant product to retail dispensing locations.



In the event that the original result falls out of specification, we will work with the state approved laboratory to understand their testing process and evaluate why a specific test resulted. A second sample from the same batch will be tested to ensure that similar results occur. If the second batch comes back similarly we will accept the results and destroy the remaining batch according to our green waste disposal process.

We will work closely with state certified laboratory service providers. Upon completion of the test, an analysis report will be created for the samples submitted. The analysis report provides details on the test results of the following compounds: THC, THC-A, CBD, CBD-A, terpenes, and the presence of contaminants such heavy metals, mercury, lead, arsenic, foreign hair, insects, microbial impurities, aspergillus.

Batches of marijuana awaiting laboratory results are segregated not only physically but also in our inventory control system, BioTrackTHC. Our inventory tracking system enables us to sort specific inventory into categories of our choosing. Batches of product awaiting test results are put into a testing category, and moved from that category to a distribution category upon receipt of the analysis report.

If we receive test results from a laboratory service provider that fail to meet our strains' specifications, we will reprocess the batch. Curing marijuana flower can improve the cannabinoid level in marijuana. We will take the batch that was segregated, waiting for test results, and cure it further in order to increase the THC or CBD levels. We will then resubmit a sample from that batch for retesting in order to ensure that all acceptable specifications have been met. If after retesting, the results from the independent laboratory remain below specification, we will treat the entire batch as unusable and dispose of it per our green waste protocols.

We retain every analysis report received from state approved laboratory service providers for each batch sample submitted for testing. Copies of the certificates will be stored on a secure server for easy access for a minimum of two years. Our dispensary staff often uses this information in educating patients on the specific characteristics of the products patients purchase. Our compliance department also maintains a database of all test results in anticipation of announced and unannounced inspections.

**QUESTION 10 – ABILITY TO COMPLY WITH SIGNAGE, PACKAGING, LABELING, AND CHAIN OF CUSTODY OF PRODUCTS**

The management team of Mana Hale Hui, LLC has over six years of experience with best practices related to signage, packaging, labeling and maintaining the chain of custody of medical marijuana and associated marijuana products.

**1. Signage:** We have considerable experience with the strict regulations in Colorado which govern permitted signage on dispensaries. We understand the need to follow local ordinances in order to be good neighbors in the communities in which we do business. At our Hawaiian dispensaries, we will post a single sign, measuring no more than 1,600 square inches. It will bear only our business name and will not include any pictures or illustrations.

We will follow similar guidelines within the interior of the retail dispensing location. Signs will be posted throughout the dispensary indicating which areas are restricted to the public, that no consumption of medical marijuana is permitted on the premises, that no person under 21 or without a 329 card is allowed on the premises, that our security system is recording 24/7, and details of our hours of operation.

**2. Packaging:** We will be fully compliant with HRS §329D-11 which discusses the requirements around packaging of medical marijuana and manufactured marijuana products. Our management team has extensive experience with dispensaries in Colorado which are subject to strict packaging requirements. We will ensure that any package used for distributing marijuana to our patient/customers will be indistinct. Color and typeface will be black and white. There will be no pictures or graphics. We will ensure that any package used for distributing marijuana to our patients will be opaque. The opaque nature of the containers prevent anyone from seeing

the contents so as not to bring undue attention to the purchase and to prevent children from recognizing what it is. All containers used when distributing product to patients will be child resistant. We are conscientious about our product and do not want children to mistakenly use it. Preventing children from accessing our product is one of our highest priorities.

**3. Labeling:** We will create a label for each individual patient that includes their name and patient identification number and will firmly affixed it to the package at the time of purchase to avoid tampering. The label will include our dispensary name, the originating cultivation facility, the strain, weight, date of packaging, expiration date, and a bar code generated by BioTrackTHC. Our labeling will not only include the percentage of THC and CBD, but also the percentage of content of other cannabinoids whose test results exceed 0.1%. The label will include the phrase, “for medical use only”. We will include a warning that it is illegal for the patient to transfer or sell the contents to any person not named on the label. The label will include a clear warning that the contents may be lawfully consumed only by the qualifying patient named on the label. The warning will further state that it is illegal for anyone to consume the contents of the package other than the qualifying patient named on the label.

In the case of a manufactured marijuana product, we will provide an equivalent physical weight of the marijuana used to produce the product. One dose will be packaged to contain no more than 10 milligrams of THC. Products that are packaged with more than one dose will contain no more than 100 milligrams of THC in total. Futhermore, all the information included on the label for marijuana flower mentioned above will also be included for manufactured marijuana products as well.

All labels on our marijuana products will include a warning in clear writing indicating that the package and its contents must be kept away from children. We will include the Hawaii

Poison Control Center emergency telephone number as well as our telephone number on the label so that the patient can call us directly to report an adverse patient event. The label will include our dispensary name, license number, address and website address to provide additional means for the patient to reach us with questions or issues. In addition, we will provide a warning that women should not consume marijuana products while pregnant or breastfeeding, except on the advice of their certifying physician.

**4. Chain of Custody:** Our Standard Operating Procedures include very strict protocols relating to the receipt of medical marijuana products from our processing centers. Upon receipt of the package from the security driver, our dispensary manager will continue the chain of custody by logging the shipment into our inventory tracking system, BioTrackTHC, and take custody of the shipment. We go into our detailed processes in great depth in our answer to Question 7.

## **QUESTION 11 – A PLAN FOR SECURE DISPOSAL OR DESTRUCTION OF MARIJUANA AND MANUFACTURED MARIJUANA PRODUCTS**

Mana Hale Hui, LLC takes the health and safety of our qualified patients very seriously. We have detailed policies and protocols that we expect to ensure a steady supply of safe and trustworthy product. There are numerous reasons why we might have to dispose of or destroy marijuana and manufactured marijuana products. Green waste can occur at several points during the cultivation and processing phases of the marijuana plants. When plants are pruned, harvested, destemmed and trimmed, the resulting parts of the plant which cannot be used have to be disposed of appropriately. In addition, harvests can be impacted by either pests or disease, such as powdery mildew. In this instance, impacted plants would have to be destroyed in order to preserve the public safety. Dispensaries might determine that flower or manufactured marijuana products have expired, been damaged, have deteriorated, been misbranded or been adulterated. If we determined that there was a deviation from our Standard Operating Procedures (SOPs) which could cause a serious risk to the health and wellbeing of our patients, we would identify all the patients who purchased from that batch via our BioTrackTHC inventory tracking system and order a recall of the products they purchased for destruction.

**1. Green Waste Disposal at Production Centers:** Our Cultivation SOPs require that green waste be weighed and logged at 4 points: 1) when plants are pruned during the cultivation phase, 2) during a harvest, 3) throughout the destemming phase, and 4) when plants are trimmed in the dry trimmer. At each point, the waste will be weighed with a certified, calibrated scale. Results will be logged by strain and date in a waste log and once the green waste weights are entered in our inventory tracking system, BioTrackTHC, inventory weights will be adjusted automatically.

Our SOPs go into great detail on how to detect and prevent damage due to pests and disease. Our growers are trained to identify the indicative signs early so that remedial efforts can be implemented in order to save the plant. Yet, despite our best efforts, there are times when plants cannot be saved and have to be destroyed. All contaminated product will be destroyed rather than put our customers at risk.

Once all green waste weights are documented, the waste matter is segregated and placed in designated green waste bins. When a sufficient quantity of green waste is collected, a certified waste vendor is contacted to process the waste. The waste vendor grinds marijuana waste and incorporates it with non-marijuana waste such as soil or kitty litter in order to render it unrecognizable and unusable. The resulting mixture will be less than 50% marijuana waste and is then placed in a secured waste receptacle and immediately removed by the third party vendor.

**2. Green Waste Disposal at Dispensaries:** At our dispensaries, any marijuana or manufactured marijuana product determined to be expired, damaged, deteriorated, adulterated or otherwise unusable will be segregated from the rest of the dispensary's inventory in a designated, secured area. The quarantined product will be vacuum sealed in packaging sufficient to isolate the contamination, and the dispensary will create a manifest before returning the product to the production center detailing the weight, strain, and reason for return. The production center will take custody of the returned shipment and process it according to our green waste protocols outlined in Section 1 above. In addition, we will perform an investigation to determine the cause of the returned complaint or adverse event. If necessary, processes and SOPs will be adjusted to ensure that the issue does not repeat itself.

**3. Recall Procedures:** Since all products we manufacture will bear unique QR and RFID codes, we are able to link specific product lot numbers to qualifying patients. We make every

effort to ensure that our products are not damaged, expired, or otherwise unusable. We include the used by date and storage and consumption instructions on our labels at the point of purchase. However, in the event that a recall needs to be initiated, BioTrackTHC and our procedures enable us to identify all patients who purchased from that batch and order a recall. After determining that a recall is appropriate, our Compliance Officer will craft a recall notification indicating the batch impacted and the reasons behind the recall. Our inventory tracking system, BioTrackTHC, maintains patient information including their phone number, email address and physician contact information allowing us to quickly and expediently notify our patients.

The dispensary will segregate recalled product returned by our patients and isolate it in a secured area. The dispensary and production centers will follow the green waste protocols detailed above. Our Compliance Officer will prepare an internal investigation report outlining dates of sale, specific products impacted, lot identifiers, the number of patients effected, the steps taken to recall, destroy and dispose of the product, adjustments made to BioTrackTHC's inventory records, and the updates made to our protocols to ensure the event does not repeat.



## **QUESTION 12 – ABILITY TO ENSURE PRODUCT SAFETY**

We consider product safety one of our highest priorities. Mana Hale Hui, LLC's management team has over six years' experience using industry best practices complying with laboratory testing for consistency, potency, contamination and microbials, ensuring the safety of different types of manufactured marijuana products, and utilizing labels and packaging which further safeguard our patients.

**1. Laboratory Certification:** Our management team is accustomed to complying with strict state regulations governing testing requirements of our products. We will conform to the Department's regulations pursuant to HRS §329D-8 regarding testing for content, contamination and consistency. As we have done in other jurisdictions, we will select and use a state certified, independent testing laboratory which is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement. A statistically representative sample of each harvest batch or lot of manufactured marijuana product will be collected and tested before being released to our retail dispensing locations. Batches of marijuana awaiting laboratory results will be separated and secured not only physically, but also in our POS system, BioTrackTHC in order to maintain an accurate, real-time inventory count.

Copies of the analysis reports provided by the laboratory will be stored on a secure server for a minimum of two years enabling our compliance department to easily access it in anticipation of announced and unannounced inspections. Our dispensary staff often use this information in educating patients on the specific characteristics of the products patients purchase to ensure that our products are being used safely.

**1a. Preventing Contamination at Production Centers:** To make certain we receive passing results from the laboratory, we have numerous production center Standard Operating Procedures (SOPs) dedicated to the prevention of contamination. We ensure a sterile and clean rooting environment to encourage peak plant growth. Our SOPs are also very specific about cleanliness requirements of our facility and equipment. Prior to cloning or up-potting our plants, all equipment and work areas will be cleaned and disinfected with a 10% bleach solution. Irrigation systems used to bring water to plants will be periodically cleaned and disinfected with a 10% bleach solution. Pots will be disinfected before being re-used for new plants. Equipment such as trimming scissors and trim machines will be cleaned with alcohol at the end of each day or more frequently as needed. Flower, vegetative and clone rooms will be thoroughly cleaned after each harvest by cleaning the floors, walls and light fixtures with a 10% bleach solution. Records of all sanitation processes and chemicals used will be logged and maintained for two years. All incoming air to the facility and recirculated air will be filtered and sterilized using UV lights to reduce the risk of air-borne contaminants. We will provide hand sanitizers throughout the building to prevent cross contamination of pathogens from our employees. To minimize the risk of water-borne pathogens, we will independently test our water source to corroborate municipality published reports.

As for materials delivered to our facilities which we use to produce marijuana, the facility manager will carefully inspect materials, such as soil or nutrients, for defects or torn packaging which could result in contamination. If the facility manager determines that the material received does not pass inspection, it will be returned to the vendor. Materials will be kept in a segregated, quarantine area so as to prevent any contamination from impacting the rest of the cultivation facility. If materials pass inspection, they will then be integrated into the facility.

**1b. Preventing Contamination at Retail Dispensing Locations:** Our dispensary SOPs are equally specific as it relates to how our dispensary employees should handle medical marijuana products in a manner which prevents contamination. In the dispensing area, staff will only use tongs, not their hands, to remove cannabis bud from containers during a sale. All employees will be required to wash their hands frequently throughout the day. We will provide sanitizer dispensers for easy access throughout the dispensary. Staff will keep lids on jars containing marijuana product to prevent airborne contamination such as from sneezing or coughing.

**2. Ensuring the product safety of different types of marijuana products:** The management team understand that the only types of medical marijuana products that may be manufactured in Hawaii pursuant to HRS §329D-10 include capsules, lozenges, pills, oils and oil extracts, tinctures, ointments and skin lotions. Each of these products will be treated with the same strict patient safety protocols as we do with marijuana flower. We will submit batches of these products for regular testing before transferring to our dispensaries. And we will ensure that the labeling and packaging for these manufactured marijuana products conform stringently to the Department of Health's regulations pursuant to HRS §329D-11.

**3. Labeling and Packaging:** Our management team has extensive experience with dispensaries in Colorado which are subject to strict labeling and packaging requirements. We will ensure that any package used for distributing marijuana or manufactured marijuana products will be plain, opaque and child resistant. Color and typeface will be black and white and there will be no pictures or graphics which could appeal to children. We understand that proper labeling further safeguards our patients' safety by providing important information on expiration

dates, potency levels, instructions for usage, directives on proper storage, and warnings against use by children, pregnant women and persons other than the patient.

In the case of a manufactured marijuana product, labels will not only include all the information described above, but will strictly follow the regulations outlined in HRS §329D-11 (9) (b). One dose will be packaged to contain no more than 10 milligrams of THC. Products that are packaged with more than one dose will contain no more than 100 milligrams of THC in total.

All labels on our products will include contact information should a patient need to ask questions on safe consumption or report an adverse event. We will include the Hawaii Poison Control Center emergency telephone number as well as our dispensary name, telephone number, license number, address and website address to provide additional means for the patient to reach us with questions or issues.

**QUESTION 13 – NO HISTORY OF HAVING A BUSINESS LICENSE REVOKED**

[REDACTED]

[REDACTED]

Due to our insistence on strict compliance throughout every facet of our operation, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

In fact, we are very proud of the fact that our management team’s product packaging label was used by the state’s regulatory body as a model for the industry.

The majority of our competitors cannot claim the same. There have been several very high profile news stories reported on marijuana facilities being closed due to utilizing unauthorized pesticides, disposing of green waste inappropriately or selling marijuana products to underage customers. We pride ourselves on our record and consider it a sign of the maturity we bring to the industry.

Part of our management team includes a Compliance Officer who is responsible for analyzing and advising on current regulations, while concurrently monitoring proposed regulatory changes affecting the industry. This proactive approach ensures we are never playing “catch-up” and are at the forefront of compliance. If the opportunity is open to us, we have found actively participating in the regulation drafting process enables us to predict with some certainty what changes are coming and provides ample time to analyze the specific impact on

various operations, train those departments, and update written guidelines well before the effective date of any regulatory changes.

Over time, Hawaii, like other states in which marijuana is approved for use medicinally and or recreationally, will update or add new regulations. Our compliance department is accustomed to a fluid regulatory system, and will monitor proposed changes to State, county, and city regulations and revise the related Standard Operating Procedures appropriately. Our Compliance Officer will then distribute updated Standard Operating Procedures to our cultivation facility for on-site storage and reference, and will train specifically impacted departments on the necessitated changes, if any, to our operating procedures.

We take our responsibility to our community seriously, especially in this burgeoning industry. We understand that members of the community might look at our operation with concern. We consider it our duty to assure them that we are ethical and conscientious in our business practices. We believe that our business processes will bear this out through our awareness and compliance with State and local regulatory requirements.