



## **Rhode Island Department of Business Regulation Office of Cannabis Regulation**

### **Application for Medical Marijuana Compassion Center License**

**Publication Release Date:  
July 17, 2020**

**Application Period: From July 17, 2020 through December 15, 2020**

**Interested parties should review the Application and submit any questions by email only to [DBR.mmpcompliance@dbr.ri.gov](mailto:DBR.mmpcompliance@dbr.ri.gov) with the subject line “Medical Marijuana Compassion Center Application Questions.” Your questions and the Department’s answers will be posted on the Department of Business Regulation website so that all Applicants will have access to the same information.**

**If you would like to be added to the interested parties list for updates to the Compassion Center Application process, please email [DBR.MMPCCompliance@dbr.ri.gov](mailto:DBR.MMPCCompliance@dbr.ri.gov), with a subject line “New Compassion Center Application Interested Parties List.”**

**Department Business Hours: M–F, 8:30 am–4:00 pm**

**For additional information regarding the Application process, please visit the Department’s website at: <https://dbr.ri.gov/>**

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## **Part 1 – Application Information and Instructions**

The Office of Cannabis Regulation within the Rhode Island Department of Business Regulation (the “Department” or the “Office”) is accepting Applications from qualified Applicants interested in being issued a Medical Marijuana Compassion Center License.

Pursuant to The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act, Rhode Island General Laws § 21-28.6-1 *et seq.*, as amended by Rhode Island Public Laws 2019, ch. 088, Article 15 (as so amended, the “Act”), the Department is responsible for licensing medical marijuana compassion centers for the licensed dispensing of medical marijuana to registered cardholders. The Medical Marijuana Program allows a patient cardholder or authorized purchaser who is registered with the Department of Health or a primary caregiver who is registered with the Department of Business Regulation to purchase medical marijuana from a licensed compassion center. Licensed compassion centers may acquire medical marijuana in accordance with the Act and *Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation*, 230-RICR-80-5-1 (the “Regulations”). **Please thoroughly review the Regulations which can be found on the Secretary of State’s website: <https://rules.sos.ri.gov/regulations/part/230-80-05-1>.**

### **SECTION A: Application Period**

**The period for submission of applications will be from 10:00 a.m. on July 17, 2020, through 3:00 p.m. on December 15, 2020 (the “Application Submission Deadline”).** Updates regarding the application period will be posted on the Department’s website: <https://dbr.ri.gov/>.

If you would like to be added to the interested parties list for the Compassion Center Application process, please email [DBR.MMPCompliance@dbr.ri.gov](mailto:DBR.MMPCompliance@dbr.ri.gov), with a subject line “New Compassion Center Application Interested Parties List.”

It is Applicant’s responsibility to ensure that its application is complete and submitted before the close of the Application Submission Deadline. Incomplete applications will be deficient and will not be accepted for review and evaluation, and the application fee will not be refunded. The Department will not accept or consider applications tendered after the Application Submission Deadline.

### **SECTION B: General Instructions**

Read this Application carefully. Answer each question completely. Do not leave blank spaces.

- **All application materials that require a signature must be signed by an “authorized signatory” of Applicant. An “authorized signatory” means a person that is authorized by the corporation/company to attest to the accuracy of all application information, materials and content submitted to the Department of Business Regulation.**
- If a question does not apply, write “N/A.” If the correct answer to a particular question is “None” write “None.”

- All Forms, Annexes, Exhibits, Documents and Deliverables on the Checklist are mandatory and must be submitted **at the time of filing this Application** in order for your Application to be complete and eligible for review.
- Applicant is under **a continuing duty to promptly notify** the Department of Business Regulation if there is a change in the information provided to the Department.
- All entries on the Application Forms, Annexes, Exhibits, Documents and Deliverables should be single spaced and typed in 12-point Calibri or Times New Roman font.
- Do not misstate or omit any material fact(s).
- The submittal of an Application constitutes acceptance of the requirements, administrative stipulations, and all of the terms and conditions of this Application. All costs and expenses incurred in submitting an Application will be borne by Applicant.
- **Definitions:** Please refer to the “Definitions” set forth in R.I. Gen. Laws § 21-28.6-3 and the “Definitions” in the Regulations, § 1.1.1, which are applicable to all compassion center license applications.

### **Application Delivery Location**

It is Applicant’s responsibility to ensure timely delivery of its Application to the Department by the 3:00 p.m., December 15, 2020 Submission Deadline. Late Applications will not be accepted.

Rhode Island Department of Business Regulation  
Attn: Office of Cannabis Regulation  
1511 Pontiac Avenue, Building 68-1  
Cranston, RI 02920  
401-462-9500

## **SECTION C: Communications with the Department of Business Regulation – Application Questions**

All questions about the Application or Application process must be sent to the Department of Business Regulation **by email only** at [DBR.mmpcompliance@dbri.gov](mailto:DBR.mmpcompliance@dbri.gov) with the subject line “**Medical Marijuana Compassion Center Application Question.**”

Questions and the Department’s answers will be posted on the Department of Business Regulation’s website so that all Applicants will have access to the same information. The Department reserves the right to not respond to questions concerning matters that are already addressed in the Application, the Act and/or the Regulations or which are immaterial or inappropriate.

For questions received after 4:00 p.m. on December 1, 2020, the Department may not respond prior to the December 15, 2020 Application Submission Deadline. Applicants and therefore encouraged to identify and submit any questions as soon as possible.

## **SECTION D: Application Requirements and Procedures**

Applicants should review the Act and the Regulations for further information regarding application requirements and procedures.

### **Zones – Procedures and Limitations**

In accordance with R.I. Gen. Laws § 21-28.6-12(c)(3) and §§ 1.2(C) & 1.15 of the Regulations, DBR evaluated the overall health needs of qualifying patients and safety of the public including the factors set forth therein and determined the following “application zones” where six (6) new compassion centers shall be licensed:

<b>ZONE</b>	<b>Geographic Boundaries</b>	<b>Number of New Licenses Available in the Zone</b>
1	Burrillville, Cumberland, Glocester, North Smithfield, Smithfield, and Woonsocket	1
2	Central Falls, Johnston, Lincoln, North Providence, and Providence	1
3	Coventry, Foster, Scituate, West Greenwich, and West Warwick	1
4	Cranston, East Greenwich, North Kingstown, and Warwick	1
5	Charlestown, Exeter, Hopkinton, Narragansett, Richmond, South Kingstown, and Westerly	1
6	Barrington, Bristol, East Providence, Jamestown, Little Compton, Middletown, Newport, New Shoreham, Pawtucket, Portsmouth, Tiverton, and Warren	1

An Applicant who applies for a compassion center license may only submit one application per zone. A person or entity cannot be an interest holder (as defined in the Regulations) with respect to more than one applicant/application for a compassion center license per zone. An Applicant may apply for a license in more than one zone provided, however, that if an Applicant is selected for a license in more than one zone, the Applicant must select a single zone in which Applicant will proceed with licensing in accordance with § 1.2(E) of the Regulations, forfeiting their license eligibility in the other zone. Another Applicant will then be selected for the zone or zones which were not selected. Applicants who apply in more than one zone must submit a separate application and separate application fee for each zone they apply to and indicate in each application all applications it has submitted and in which zones. Pursuant to R.I. Gen. Laws § 21-28.6-12 (c)(1)(i), the application fees are nonrefundable, even in instances where an Applicant submits applications in more than one zone.

Pursuant to § 1.2(E)(4) of the Regulations, a selected Applicant may not change or alter its proposed location to another location within the same zone without prior Department approval. A selected Applicant may not relocate or change its proposed location outside of the zone for which they were selected.

### **Review and Evaluation Criteria**

The Department of Business Regulation shall review and evaluate the submitted Applications based upon the criteria set forth in R.I. Gen. Laws § 21-28.6-12(c)(3) and § 1.2 of the Regulations. All Applicants that are deemed “qualified” by the Department shall be eligible for selection.

The Department may require an initial inspection of the proposed licensed premises in order to verify information contained in an Application before deeming an Applicant “qualified” and eligible for inclusion in the selection process.

### **Final Inspection, Requirements and Deadlines**

Selected Applicants must schedule and receive a final pre-license inspection prior to the Department’s issuance of a compassion center license. Additionally, all registry identification card requirements, including completion of national criminal background checks, payment of the \$500,000 licensing fee, and all other licensing conditions and requirements under the Act and Regulations must be satisfied prior to the Department’s issuance of a license. Selected Applicants will have nine (9) months from the date of Application approval to complete the pre-requisites for issuance of the license as described in the Regulations. Once a license is issued, a licensee shall have a period of three (3) months to take reasonable and documented efforts to “launch compassion center activities” as defined in the Regulations. If a selected Applicant or compassion center licensee is unable to meet either of these deadlines, the Department of Business Regulation may rescind its selection/approval and/or revoke the license as described in the Regulations.

### **Divestiture of Prohibited Financial Interests**

Pursuant to § 1.2(F)(7) of the Regulations, a compassion center and any interest holders/key persons thereof may not have any “material financial interest or control” in another Rhode Island compassion center, a cultivator, or a licensed cooperative cultivation or vice versa. Accordingly, disclosure of any such interests and a divestiture plan must be made as required in CC Form 3, Question 4, and Exhibit A.

### **Merger of Cultivator License**

Pursuant to R.I. Gen. Laws § 21-28.6-12(b)(10), if a selected Applicant holds a cultivation license, the cultivation license shall merge into the compassion center license and Applicant shall provide the documents required under § 1.2(F)(3)(b)(7) of the Regulations.

### **Prohibited Business Relationships**

A compassion center licensee and any cardholders under the compassion center license are prohibited from entering into a business relationship with any medical practitioner who provides written certifications of qualifying patients’ medical conditions in connection with the Medical Marijuana Program.

### **Denial or Disqualification of Application**

The Department of Business Regulation may disqualify or deny any Application or decline to issue a license under any of the following circumstances:

- Applicant fails to submit a complete Application, hard copies, and electronic copies including all Forms, Annexes, Exhibits, Documents and Deliverables set forth on the Checklist in Part 2 and the copies with required redactions set forth in Part 3 of this Application.

- The Application contains a material misstatement, omission, misrepresentation, or untruth.
- Applicant fails to submit the Application by the Application Submission Deadline.
- Applicant fails to pay the \$10,000 Application fee prior to the Application Submission Deadline.
- The payment of taxes due in any jurisdiction is in arrears.
- Applicant fails to demonstrate to the Department's satisfaction that it adequately meets the qualifications and requirements outlined in this application, the Act, and the Regulations.
- Applicant fails to pay the \$500,000 license fee pursuant to R.I. Gen. Laws § 21-28.6-12(c)(5)(ii)(A).
- Applicant fails to implement policies, procedures or actions indicated in its Application.

### **Inventory Limits**

If an Application is approved and a compassion center license is issued to Applicant, Applicant will not be permitted to possess or cultivate medical marijuana seedlings or plants unless a variance request is submitted to, and approved by, the Department in accordance with § 1.6.4 of the Regulations. Applicant may include in its Application information about past cultivation experience and may propose to conduct cultivation activities and/or a licensing of premises for cultivation provided, however, that any such cultivation proposals will not be evaluated or considered by the Department as part of initial licensing. Any such cultivation proposal will only be evaluated and considered by the Department at a later date as determined by the Department in accordance with § 1.6.4 of the Regulations. Pursuant to the Act and § 1.6.4 of the Regulations, a licensed compassion center must limit its inventory of medical marijuana and medical marijuana products to reflect the needs of qualifying patients.

## **SECTION E: Important Notices/Disclaimers**

- This Application is an **OFFICIAL DOCUMENT** of the Rhode Island Department of Business Regulation. It **MAY NOT** be altered or changed in any fashion except to fill in the areas provided with the information that is required. Should any alteration or revision of a question occur, the Department reserves the right to deny the Application in its entirety or deem void that specific response and treat that section as unanswered.
- The burden of proving an Applicant's qualifications at all times rests on Applicant. Applicant accepts any and all risk of adverse public notice, criticism, emotional distress, or financial loss that may result from any action with respect to this Application. Applicant expressly waives any and all claims for damages as a result thereof.
- After the Application has been submitted, Applicant may withdraw the submitted Application after written notice to the Department. The Application fee will not be refunded.
- Applicants are generally prohibited from submitting additional information after the Application is submitted unless the Department requests more information, and except in the event that the Applicant must disclose any changes in ownership, interest holders, and/or CC Form 2, Form 3, Form 4 and Form 5 disclosures throughout the entirety of the application and licensure periods.

- The Department may request any additional information or request an inspection of proposed location if it determines it is necessary to process and fully evaluate an Application. Applicant shall provide the additional information, documentation, materials and/or certifications within the time prescribed and at the Applicant's own expense. If Applicant does not provide the requested information within the prescribed time period, the Department may remove the Application from the evaluation process.
- **Applicant is under a continuing duty to promptly disclose to the Department any changes in ownership, interest holders, and/or CC Form 2 Disclosures throughout the entirety of the application and licensure periods.**
- **Proposed changes to interest holders and key persons require the Department's approval pursuant to the variance procedure outlined in the Regulations, provided, however, that no variance which affects a majority change in ownership, control, financial interest and/or compensation/remuneration will be approved prior to conclusion of the first year of licensed activities except upon the Department's determination that public, health, safety or welfare requires such variance.**
- All notices regarding an Application submission will be sent to Applicant's Compliance Officer email address provided on the Application Information Sheet, CC Form 1. Applicant must immediately notify the Department if Applicant's email address changes. Further, Applicant is responsible for ensuring that the email address provided in Form 1 of this application is and remains operational to ensure that all e-mail communications from the Department of Business Regulation are received; e-mails sent by the Department will be presumed to have been received by Applicant.
- All Application submissions become the property of the Department and will not be returned.
- **The Department of Business Regulation's decision to approve, disqualify, or deny an Application is final.**



## **Part 2 – CHECKLIST FOR ALL FORMS, ANNEXES, EXHIBITS, DOCUMENTS, AND DELIVERABLES**

All Forms, Annexes, Exhibits, Documents, and Deliverables set forth below must be included in an Application for Medical Marijuana Compassion Center License. Pursuant to § 1.2(C)(5) of the Regulations, only applications which the Department determines to be complete, including delivery of all completed Forms, Annexes, Exhibits, Documents, and Deliverables, as set forth below, shall be eligible for further evaluation and review. Incomplete applications will be deficient and will not be considered further, and the application fee will not be refunded.

<b>FORM/Exhibit #</b>	<b>Name/Description</b>	<b>Included Yes</b>
<b>CC Form 1</b>	Application Information Sheet, Taxpayer Status, Notices and Affirmations executed by a duly authorized signatory of Applicant.	<input checked="" type="checkbox"/>
<b>CC Form 2</b>	Disclosure of Owners and Other Interest Holders executed by a duly authorized signatory of Applicant	<input checked="" type="checkbox"/>
	Attached Organizational chart	<input checked="" type="checkbox"/>
	Attached Schedule of effective ownership interests and compensation/remuneration as described in Section III of the CC Form 2, in compliance with § 1.2(C)(4)(h) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Form 3</b>	Interest Holder Certification Statement executed by a duly authorized signatory of Applicant.	<input checked="" type="checkbox"/>
<b>CC Form 4</b>	Certification Regarding Nonprofit Status and Compliance executed by a duly authorized signatory of Applicant.	<input checked="" type="checkbox"/>
	Attached Annex A – Nonprofit Documents	<input checked="" type="checkbox"/>
	Attached Annex B – Management Companies	<input checked="" type="checkbox"/>
	Attached Annex C – Vendors	<input checked="" type="checkbox"/>
	Attached Annex D – Contracts	<input checked="" type="checkbox"/>
	Attached Annex E – Related Party Transactions	<input checked="" type="checkbox"/>
	Attached Annex F – Real Estate	<input checked="" type="checkbox"/>
	Attached Annex G – Equipment	<input checked="" type="checkbox"/>
	Attached Annex H – Annual Compensation	<input checked="" type="checkbox"/>
<b>CC Form 5</b>	Disclosure executed by a duly authorized signatory of Applicant of all applications, licenses and/or registrations in any jurisdiction, and any withdrawals, denials, suspensions, revocations, consents orders/agreements and/or other enforcement or regulatory actions in any jurisdiction, including copies thereof in compliance with § 1.2(C)(4)(m)(1) and (2) of the Regulations	<input checked="" type="checkbox"/>

<b>Application Fee</b>	\$10,000 nonrefundable Application Fee, payable to the General Treasurer, State of Rhode Island, in the form of a cashier's check or money order only in compliance with § 1.2(C)(4)(a) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit A</b>	Disclosure of any material financial interests or control in another compassion center, cultivator, cooperative cultivation or other marijuana establishment licensee, and a plan of divestiture in compliance with §§ 1.2(C)(4)(i) and 1.2(F)(7) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit B</b>	Evidence of appointment of a Compliance Officer for the proposed Compassion Center and including Applicant's legal and operational compliance plan in accordance with § 1.2(C)(4)(l) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit C</b>	Applicant's Business Plan for the Compassion Center with all information and in compliance with § 1.2(C)(4)(c) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit D</b>	Applicant's Security and Safety Plan with all information and in compliance with § 1.2(C)(4)(d) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit E</b>	Applicant's Operations Manual for the Compassion Center with all information and in compliance with § 1.2(C)(4)(e) of the Regulations	<input checked="" type="checkbox"/>
<b>CC Exhibit F</b>	Per § 1.2(C)(4)(f)(1) – (5) of the Regulations, a description of the proposed Licensed Premises, including street address, plat/lot number and zoning district	<input checked="" type="checkbox"/>
<b>Submission of Required Electronic and Paper Copies of Entire Application</b>		
<b>Version A – Paper</b>	Complete unredacted signed paper copy of the entire Application	<input checked="" type="checkbox"/>
<b>Version A - Electronic</b>	Complete electronic copy of the Version A paper application on a USB thumb drive	<input checked="" type="checkbox"/>
<b>Version B - Paper</b>	Complete paper copy of entire application redacted as instructed in Part 3 of this Application	<input checked="" type="checkbox"/>
<b>Version B – Electronic</b>	Complete electronic copy of entire application redacted as instructed in Part 3 of this Application on a USB thumb drive	<input checked="" type="checkbox"/>
<b>Version C – Paper</b>	Complete paper copy of entire application redacted as instructed in Part 3 of this Application	<input checked="" type="checkbox"/>
<b>Version C – Electronic</b>	Complete electronic copy of entire application redacted as instructed in Part 3 of this Application on a USB thumb drive	<input checked="" type="checkbox"/>

All Forms must be completed in their entirety; if a question or field is “not applicable” Applicant must insert “N/A.” If the correct answer to a particular question is “None” write “None.”

### **Part 3 – Three (3) Copies of Each Application Required – Digital and Paper – Some Redaction Required**

Applicant must submit a hard copy and an electronic copy of three different versions of the Application.

- Version A is the unredacted application.
- Version B includes certain redactions for purposes of public records disclosures.
- Version C will be used for the initial review without identifying information. If this information adequately displays Applicant's qualifications and their ability to meet the license requirements under the Act and the Regulations, then the Department will review the rest of the Application.

It is the responsibility of Applicant to redact all necessary information in accordance with the following instructions.

#### **Application Version A – Unredacted Application:**

- (1) A complete, signed paper copy of the completed Application with all completed Forms, Annexes, Exhibits, Documents and Deliverables; and
- (2) An electronic copy of item (A)(1) (immediately above) on a USB thumb drive.

#### **Application Redacted Version B – Application with Redacted Personal, Financial and Security Information:**

- (1) A paper copy of the completed Application with all completed Forms, Annexes, Exhibits, Documents and Deliverables, redacted as described below to be posted on the Department's website; and
- (2) An electronic copy of item (B)(1) (immediately above) on a USB thumb drive.
  - Leave names of all Owners, Interest Holders and Key Persons visible in the Application.
  - Redact any reference to patient, caregiver or authorized purchaser registration names, addresses, card numbers or cards.
  - Redact any social security numbers and/or federal employer identification numbers
  - Redact all dates of birth and home street addresses as to individual natural persons
  - Redact any bank account numbers and bank account information on any check or other document that is submitted
  - Redact all ownership percentages and dollar amounts, including in the Form 2, Form 4 and schedules/annexes attached thereto
  - Redact all of CC Exhibit C, Applicant's Business Plan
  - Redact all of CC Exhibit D, Applicant's Security and Safety Plan
  - Redact any financial and proprietary information in CC Exhibit E, Applicant's Operations Manual
  - In CC Exhibit F, redact any floor plans/diagrams of the proposed facilities

**Application Redacted Version C - Application with Redacted Personal and Interest Holder**

**Information including Names:**

(1) A paper copy of completed Application with all completed Forms, Annexes, Exhibits, Documents and Deliverables, redacted as described below; and

(2) An electronic copy of item (C)(1) (immediately above) on a USB thumb drive.


- Redact Applicant's name and all names and addresses of all Owners, Interest Holders and Key Persons.
- Redact any reference to all names, addresses, registry identification card numbers of all patients, caregivers and authorized purchasers.
- Redact any social security numbers and/or federal employer identification numbers
- Redact all dates of birth and home street addresses as to individual natural persons
- Redact any bank account numbers and bank account information on any check or other document that is submitted

Other than the redacted material, the information provided in the (A), (B) and (C) versions of the Application must be identical.

## **Part 4 – Compassion Center Required Application Forms**

### **CC FORM 1 – GENERAL CONTACT INFORMATION, TAXPAYER IDENTIFICATION AND AFFIRMATIONS**

<b>1</b>	<b>COMPANY NAME</b>  (legal name, and any d/b/a name(s), if applicable)	Cann Cure Compassion, Inc.
	<b>Application ZONE#</b>	4  (note separate applications and application fees are required to apply to multiple zones)
<b>2</b>	<b>BUSINESS STREET ADDRESS</b>	10 Messenger Drive
<b>3</b>	<b>CITY, STATE, ZIP</b>	Warwick, Rhode Island 02888
<b>4</b>	<b>STREET ADDRESS OF PROPOSED LICENSED PREMISES FOR RETAIL SALES OF MEDICAL MARIJUANA</b>	10 Messenger Drive
<b>5</b>	<b>CITY, STATE, ZIP</b>	Warwick, Rhode Island 02888

<b>6</b>	<b>PLAT#/LOT# OF PROPOSED LICENSED PREMISES FOR RETAIL SALES OF MEDICAL MARIJUANA</b>	19800/M:285; L:123						
<b>7</b>	<b>SQUARE FOOTAGE OF PROPOSED FACILITY FOR RETAIL SALE OF MARIJUANA</b>	3,920 Sq. Ft.						
<b>8</b>	<b>FEIN:</b>  (Federal Employer Identification Number)							
<b>9</b>	<b>TELEPHONE NUMBER</b>	<table border="0"> <tr> <td><b>AREA CODE</b></td> <td><b>NUMBER</b></td> <td><b>EXTENSION</b></td> </tr> <tr> <td colspan="3"><u>(401) 374-7761</u></td> </tr> </table>	<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>	<u>(401) 374-7761</u>		
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<u>(401) 374-7761</u>								
<b>10</b>	<b>FAX NUMBER</b> (if not applicable, put "N/A")	<table border="0"> <tr> <td><b>AREA CODE</b></td> <td><b>NUMBER</b></td> <td><b>EXTENSION</b></td> </tr> <tr> <td colspan="3"><u>N/A</u></td> </tr> </table>	<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>	<u>N/A</u>		
<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>						
<u>N/A</u>								
<b>11</b>	<b>TOLL FREE NUMBER</b> (if not applicable, put "N/A")	<table border="0"> <tr> <td><b>AREA CODE</b></td> <td><b>NUMBER</b></td> <td><b>EXTENSION</b></td> </tr> <tr> <td colspan="3"><u>N/A</u></td> </tr> </table>	<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>	<u>N/A</u>		
<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>						
<u>N/A</u>								
<b>12</b>	<b>COMPLIANCE OFFICER Identification and Contact Information</b>	<p><b>Applicant must appoint a Compliance Officer to whom information, notices, and documents will be sent. The Department reserves the right to contact and/or send notices and other correspondence to Applicant by email and/or post mail. It is Applicant's responsibility to ensure that the Compliance Officer information is correct and up to date at all times following application and throughout licensure.</b></p>						
	<b>Name:</b>	Garret Cardillo						
	<b>Title:</b>	Compliance Officer						

<b>Mailing Address:</b>	142 Lovely Street, Unionville, CT 06085		
<b>Email Address:</b>	Cardillo.garret@gmail.com		
<b>Phone Number</b>	<u>(860) 539-6064</u>		
	<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>
<b>Fax Number (if not applicable, put "N/A")</b>	<u>N/A</u>		
	<b>AREA CODE</b>	<b>NUMBER</b>	<b>EXTENSION</b>

### **TAXPAYER STATUS**

All persons and entities applying for or renewing any license, registration, permit, or other authority (hereinafter called "licensee") to conduct a business or occupation in the state of Rhode Island are required to file all applicable tax returns and pay all taxes owed to the state prior to receiving a license as mandated by R.I. Gen. Laws Chapter 5-76, except as noted below.

**PLEASE CHECK ONE BOX BELOW OR APPLICATION WILL BE CONSIDERED INCOMPLETE**

- ☒ I hereby declare, under penalty of perjury, that I have filed all required state tax returns and have paid all taxes owed.
- ☐ I have entered a written installment agreement to pay delinquent taxes that is satisfactory to the Tax Administrator.
- ☐ I am currently pursuing administrative review of taxes owed to the state.
- ☐ I am in federal bankruptcy. (Case # \_\_\_\_\_)
- ☐ I am in state receivership. (Case # \_\_\_\_\_)
- ☐ I have been discharged from Bankruptcy. (Case # \_\_\_\_\_)

Cann Cure Compassion, Inc.

Name of Taxpayer/Entity  
Number

  
Social Security or Federal Tax Identification

## **CC Form 1 - AFFIRMATIONS**

### **Applicant hereby understands and affirms the following:**

1. The burden of proving an Applicant's qualifications rests on the party applying for the license.
2. The Department of Business Regulation may deny an Application that contains a material misstatement, omission, misrepresentation, or untruth.
3. An Application shall be complete in every material detail.
4. The Department of Business Regulation may rescind its approval of a Compassion Center License if Applicant has not completed the pre-requisites for issuance of the license as described in the Regulations within nine (9) months of their approval.
5. Regarding the location of the licensed premises, Applicant commits to the following:
  - a. The premises and operations of Applicant shall conform to local zoning requirements.
  - b. The Compassion Center License shall be conspicuously displayed at the licensed premises.
6. Regarding manufacturing, Applicant commits to having any form of manufacturing that uses a heat source or flammable/combustible material approved by the State Fire Marshal and/or the local fire department.
7. Applicant commits to not using any compressed, flammable gas as a solvent in any solvent extraction process, manufacturing or for any other purpose.
8. Applicant commits to not acquiring medical marijuana from anyone other than a licensed cultivator in accordance with the Act and the Regulations.
9. Applicant commits to the limitations set forth in the Act and the Regulations and understands that they are limited to possessing marijuana only as permitted in the Act and the Regulations.
10. Applicant understands that the licensed premises may not be within 1,000 feet of the property line of a preexisting public or private school.
11. Applicant hereby acknowledges that its employees covered by the National Labor Relations Act or the Rhode Island State Labor Relations Act have the right to form, attempt to form or join a union in the workplace. Applicant acknowledges that its covered employees may be fairly represented by a union if one is formed. Applicant also acknowledges that its employees have the right to refuse to do any or all of these things and that Applicant may not interfere with, restrain or coerce employees in the exercise of these rights.
12. Applicant understands that a licensed compassion center and any interest holders/key persons thereof may not have any material financial interest or control in another Rhode Island licensed compassion center, licensed cultivator or a licensed cooperative cultivation or in a Rhode Island Department of Health approved third party testing provider and vice versa.



**SIGNATURE FOR CC FORM 1**

**The undersigned attests that Applicant organization understands and will adhere to the all requirements of the Act and the Regulations, including but not limited to those listed above, and that they have the authority to bind Applicant organization to all requirements.**

**The undersigned Authorized Signatory of Applicant hereby acknowledges and agrees that Applicant/Licensee has a continuing obligation to disclose any changes to the entirety of this Application for Medical Marijuana Compassion Center License and shall provide written notice to the Department within thirty (30) days of any change of the information provided herein including all Forms, Annexes, Exhibits, Documents and Deliverables submitted in connection with or as part of the application process; each such notice shall include an updated Form, Annex, Exhibit, Document or Deliverable, as the case may be.**

**Under penalty of perjury, the undersigned hereby declares and verifies that all statements on and information contained in this Application including all Forms, Annexes, Exhibits, Documents and Deliverables submitted herewith, are complete, true, correct and accurate.**

**AUTHORIZED SIGNATORY SIGNATURE**

**SIGNATURE:**

*Garret Cardillo*

**Print Name:** Garret Cardillo

**Print Title:** Compliance Officer for Cann Cure Compassion, Inc.

**DATE:**

12/14/2020

**CC FORM 2**  
**Disclosure of Owners and Other Interest Holders**

**Name of Applicant/Licensee:** Cann Cure Compassion Inc.

**Section I: Owners and Other Interest Holders**

List (A.) all persons and/or entities with any ownership interest with respect to applicant/licensee, **and** (B.) all officers, directors, members, managers or agents of applicant/licensee, **and** (C.) all persons or entities with managing or operational control with respect to applicant/licensee, its operations, the license and/or licensed facilities whether they have an ownership interest or not, **and** (D.) all investors or other persons or entities with any financial interest whether they have ownership interest or not, **and** (E.) all persons or entities that hold interest(s) arising under shared management companies, management agreements, or other agreements that afford third-party management or operational control with respect to applicant/licensee, its operations, the license and/or the licensed facilities (all persons and entities described in (A)-(E) being hereinafter individually referred to as an "Interest Holder" and collectively referred to as "Interest Holders").

To the extent that any Interest Holder is an entity (corporation, partnership, LLC, *etc.*), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level. Attach a separate sheet(s) if necessary.

**A. LIST ALL PERSONS AND/OR ENTITIES WITH ANY OWNERSHIP INTEREST IN APPLICANT/LICENSEE (including corporation stockholders, LLC members, and partners if a partnership; this includes parent companies if applicant/licensee is a subsidiary of another entity).**

To the extent that any Interest Holder is an entity (corporation, partnership, LLC, *etc.*), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level.

Name Gregory S. Cooper	Title Managing Member	SSN/FEIN [REDACTED]	DOB [REDACTED]	App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 374-7761
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC	Own. % Business Associated with [REDACTED]		Effective Own. % in Applicant [REDACTED]	
Name Patricia A. Thomson	Title Member	SSN/FEIN [REDACTED]	DOB [REDACTED]	App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 378-8978
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC	Own. % Business Associated with [REDACTED]		Effective Own. % in Applicant [REDACTED]	
Name Michael Watkins	Title Member	SSN/FEIN [REDACTED]	DOB [REDACTED]	App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 529-7138
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC	Own. % Business Associated with [REDACTED]		Effective Own. % in Applicant [REDACTED]	
Name Angie Watkins	Title Member	SSN/FEIN [REDACTED]	DOB 10/21/1976	App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 787-7383

Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Own. % Business Associated with ■		Effective Own. % in Applicant ■	
Name Brian Slusarz		Title Member		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number ( 860 ) 817-3905			
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Own. % Business Associated with ■		Effective Own. % in Applicant ■	
Name TechniArt Inc.		Title Member		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number ( 860 ) 696-8697			
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Own. % Business Associated with ■		Effective Own. % in Applicant ■	
Name Cann Cure Cultivation LLC		Title Member		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number (401 ) 374-7761			
Business Associated with (Applicant, parent business or sub-entity) ■		Own. % Business Associated with ■		Effective Own. % in Applicant ■	
<p><b>B. LIST ALL OFFICERS, DIRECTORS, MANAGERS, MEMBERS OR AGENTS OF APPLICANT/LICENSEE AND ANY OTHER ENTITIES DESCRIBED IN SECTION A.</b></p> <p>To the extent that any such Interest Holder is an entity (corporation, partnership, LLC, <i>etc.</i>), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level.</p>					
Name Gary Cardillo		Title CEO		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number ( 860 ) 794-5525			
Business Associated with (Applicant, parent business or sub-entity) TechniArt Inc.		Title (officer, director, manager, etc.) CEO			
Name Adam Tardif		Title President		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number ( 860 ) 792-2112			
Business Associated with (Applicant, parent business or sub-entity) TechniArt Inc.		Title (officer, director, manager, etc.) President			
Name Gregory S. Cooper		Title Director		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Address (residence if an individual) ■■■■■		City ■■■■■		State ■	
ZIP ■■■■■		Phone Number (401 ) 374-7761			
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Title (officer, director, manager, etc.) Managing Member			
Name Patricia A. Thornton		Title Director		SSN/FEIN ■■■■■	
DOB ■■■■■		App submitted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			



Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 378-8978
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Title (officer, director, manager, etc.) Member		
Name Michael Watkins	Title Director	SSN/FEIN [REDACTED]	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual) [REDACTED]	City [REDACTED]	State [REDACTED]	ZIP [REDACTED]	Phone Number ( 401 ) 529-7138
Business Associated with (Applicant, parent business or sub-entity) Cann Cure Cultivation LLC		Title (officer, director, manager, etc.) Member		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Title (officer, director, manager, etc.)		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Title (officer, director, manager, etc.)		
<b>C. LIST ALL PERSONS OR ENTITIES WHO HAVE MANAGING OR OPERATIONAL CONTROL WITH RESPECT TO APPLICANT/LICENSEE, ANY OTHER ENTITIES DESCRIBED IN SECTIONS A OR B, ITS OPERATIONS, THE LICENSE, AND/OR LICENSED FACILITIES (WHETHER THEY HAVE AN OWNERSHIP INTEREST OR NOT).</b>				
<p>To the extent that any such Interest Holder is an entity (corporation, partnership, LLC, <i>etc.</i>), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level.</p>				
Name N/A	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )

Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Role, interest, etc.			
<b>D. LIST ALL INVESTORS OR OTHER PERSONS OR ENTITIES WHO HAVE ANY FINANCIAL INTEREST WITH RESPECT TO APPLICANT/LICENSEE, ANY OTHER ENTITIES DESCRIBED IN SECTIONS A, B OR C, ITS OPERATIONS, THE LICENSE, AND/OR LICENSED FACILITIES (WHETHER THEY HAVE AN OWNERSHIP INTEREST OR NOT).</b>					
<p>To the extent that any such Interest Holder is an entity (corporation, partnership, LLC, <i>etc.</i>), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level.</p>					
Name N/A	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Interest			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number (    )	
Business Associated with (Applicant, parent business or sub-entity)		Interest			
Name	Title	SSN/FEIN		DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No

Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
<b>E. LIST ALL PERSONS OR ENTITIES THAT HOLD INTEREST(S) ARISING UNDER SHARED MANAGEMENT COMPANIES, MANAGEMENT AGREEMENTS, OR OTHER AGREEMENTS THAT AFFORD THIRD-PARTY MANAGEMENT OR OPERATIONAL CONTROL WITH RESPECT TO APPLICANT/LICENSEE, ITS OPERATIONS, THE LICENSE AND/OR THE LICENSED FACILITIES.</b>					
<p>To the extent that any such Interest Holder is an entity (corporation, partnership, LLC, <i>etc.</i>), list all Interest Holders in that entity until all such Interest Holders are identified and disclosed down to the individual person level.</p>					
Name N/A		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )
Business Associated with (Applicant, parent business or sub-entity)			Interest		
Name		Title	SSN/FEIN		DOB App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)		City	State	ZIP	Phone Number (    )

Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		
Name	Title	SSN/FEIN	DOB	App submitted? <input type="checkbox"/> Yes <input type="checkbox"/> No
Address (residence if an individual)	City	State	ZIP	Phone Number ( )
Business Associated with (Applicant, parent business or sub-entity)		Interest		

**Section II:** List all persons (including individuals, firms, partnerships, corporations, limited liability companies, trusts), besides the owners and other Interest Holders previously listed in this Form [2], who/that will loan, give, or otherwise provide money, property interests, equipment, inventory, furniture, licensing or other proprietary rights to or for use in this business, or hold a security interest therein; or who will receive money, profits, proprietary rights or other interests from this business. Attach a separate sheet if necessary. If any such person is an entity, list all persons with any ownership in or control of that entity.

Name	Date of Birth	SSN/FEIN	Interest/Dollar Amount
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A

**Section III:**

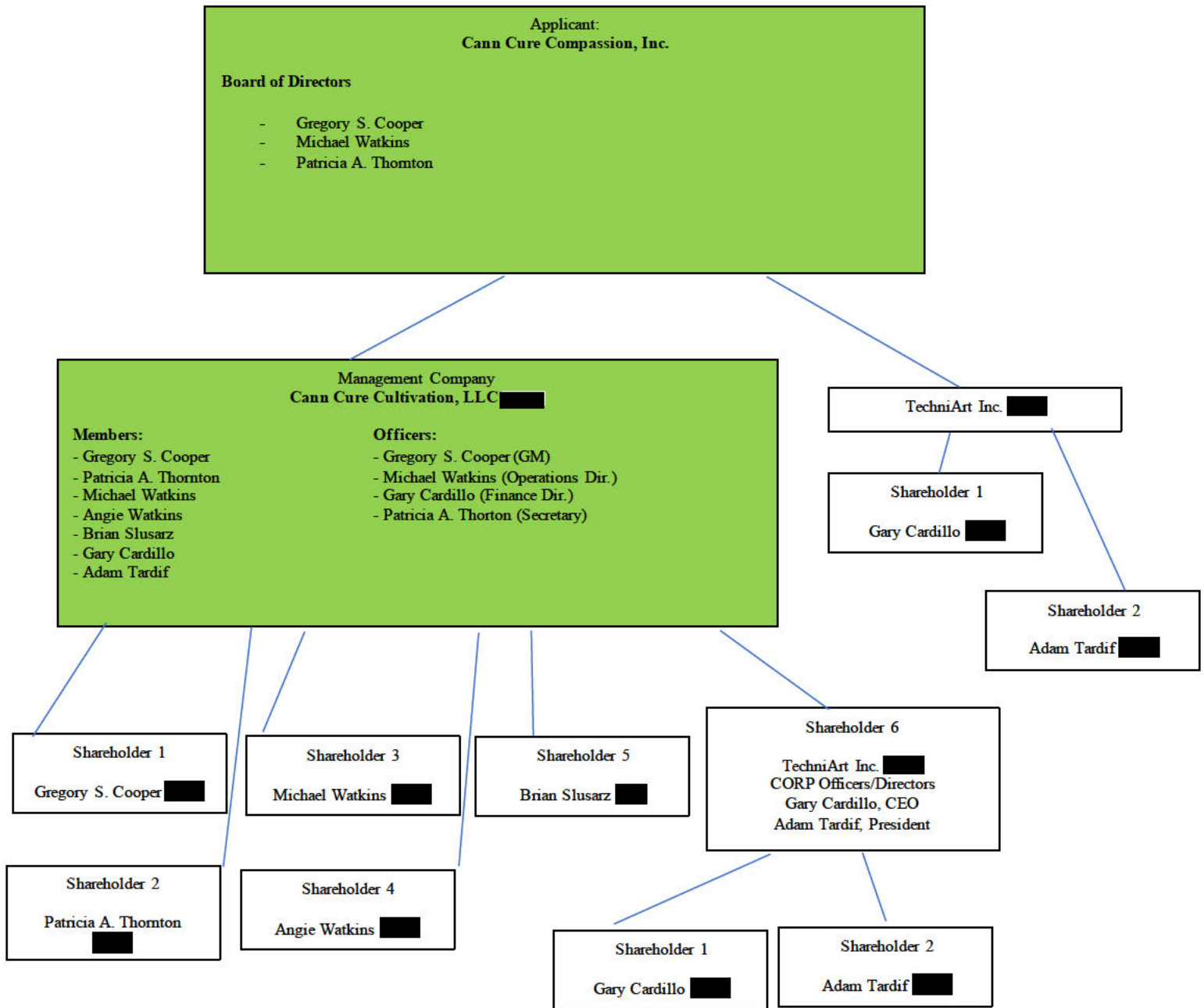
- A. Attach an organizational chart that clearly depicts all Interest Holders identified in this Form 2.
- B. Attach a list of all Interest Holders identified in Section I(A) and I(D) of Form 2 that are individual persons and include the effective ownership percentage and dollar amount of each Interest Holder's interest with respect to Applicant/Licensee, its operations, the license and/or licensed facilities. List them in order of their effective ownership percentage.
- C. Attach a list of all Interest Holders identified in Section I(A), I(B), I(C) and I(E) of Form 2 and include the dollar amount of annual compensation/remuneration paid/to be paid to such Interest Holders with respect to Applicant/Licensee, its operations, the license and/or licensed facilities for the last five years.

**The organizational chart and accompanying lists should follow the form and structure of the sample charts and lists included with this form.**



## Appendix A – CC Form 2 Organizational Chart Example

### Cann Cure Compassion, Inc. Organizational Chart





## **Appendix B – CC Form 2 Sample Schedule of Effective Ownership Interests**

\*All salaries and annual compensations listed below are proposed for forecasting purposes. All salaries and annual compensations are subject to change once Cann Cure Cultivation LLC and Cann Cure Compassion Inc. are operational.

	Officers/ Directors/ Managers/Board		Salary	Annual Compensation	Cann Cure Compassion Inc.	Cann Cure Cultivation LLC
1	President/ Board Member				X	
2	Vice President/ Board Member				X	
3	Treasurer/ Secretary/ Board Member				X	
4	Compliance Manager				X	
5	Dispensary Manager				X	
6	Security Consultant				X	
	Staffing Cann Cure Cultivation LLC (Management Company)		Salary	Annual Compensation	Cann Cure Compassion Inc.	Cann Cure Cultivation LLC
1	General Manager/ Managing Member					X
2	Head Cultivator					X
3	Chief Financial Officer					X
4	Human Resources					X
5	Chief Security Officer					X
6	Quality Control Manager					X
7	Inventory Manager					X
8	Cultivation Team Member					X
9	Packaging & Labeling Lead					X
10	Trimming, Curing, & Packaging Lead					X

## **CERTIFICATION AS TO CC FORM 2**

The undersigned duly authorized signatory of Applicant/Licensee, in his/her capacity as such, for and on behalf of Applicant/Licensee, after due inquiry, hereby certifies to the Office of Cannabis Regulation of the Department of Business Regulation (the "Department" or "DBR") that it/he/she has disclosed to the Department in this Form 2:

(A) With respect to Applicant/Licensee, all persons and entities that:

- (i) Are owners, members, officers, directors, managers, or agents of Applicant/Licensee; and
- (ii) Have/will have managing or operational control with respect to Applicant/Licensee, its operations, the license and/or licensed facilities whether they have an ownership interest or not; and
- (iii) Are investors or have any other financial interest therein; and
- (iv) Hold interest(s) arising under shared management companies, management agreements, or other agreements that afford third-party management or operational control with respect to Applicant/Licensee, its operations, the proposed license, and/or the licensed facilities (any person or entity in the foregoing (i), (ii) and (iii) being herein individually referred to as an "interest holder" and all such persons and entities in the foregoing (i), (ii), (iii), and (iv) being collectively referred to as the "interest holders"); and

(B) To the extent that any interest holder described in (A) above is an entity, all interest holders in that entity until all such interest holders are identified and disclosed down to the individual person level.

The undersigned, after due inquiry, further certifies to the Department that, except for the license that is the subject of this Form 2 and except as permitted under R.I. Gen. Laws § 21-28.6-12(b)(10), no "interest holder" disclosed herein is an "interest holder" with respect to any other license issued by, or license application made to, the Department as to a "marijuana establishment licensee" as defined in R.I. Gen. Laws § 21-28.6-3(17).

The undersigned hereby acknowledges and agrees that Applicant/Licensee has a continuing obligation to disclose any changes and shall provide written notice to the Department within thirty (30) days of any change of the persons/entities/interest holders described and the certifications made in this Form 2 and that each such notice shall include an updated Form 2.

Under penalty of perjury, I hereby declare and verify that all statements on and information submitted with this Form 2 are complete, true, correct, and accurate.

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name  
Print Title: Compliance Officer  
Print Name of Applicant/Licensee: Cann Cure Compassion Inc.

**CC FORM 3****Owners and Interest Holders Certification Statement Form**

On behalf of Applicant, and with respect to Applicant and each of the Interest Holders/Key Persons described in Form 2, the undersigned certifies as follows:

<p>1. Has the Applicant or any Owner or Interest Holder or any marijuana business entity or its equivalent in which such persons hold or have held an interest or a medical marijuana or other marijuana or cannabis license, registration or authorization in another state or jurisdiction, ever been disciplined (discipline includes without limitation any denial, suspension, revocation, fines or other sanction of the license, registration or authorization) by any state or jurisdiction? If “Yes” provide a brief explanation, copies of all documentation and name/address/phone number/contact person for the licensing/registration/authorization authority.</p> <p>N/A</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p><input checked="" type="checkbox"/></p>
<p>2. Has the Applicant and/or any Owner or Interest Holder ever been denied a professional license, privilege of taking an examination, or had a professional license or permit disciplined by a licensing authority in Rhode Island or any other state or jurisdiction (discipline includes without limitation any denial, suspension, revocation, fines or other sanction of the license, registration or authorization)? If “Yes” provide a brief explanation, copies of all documentation and name/address/phone number/contact person for the licensing/registration/authorization authority.</p> <p>N/A</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p><input checked="" type="checkbox"/></p>
<p>3. Is any Owner or Interest Holder employed by the State of Rhode Island? If “Yes” please describe below.</p>	<p>Yes</p> <p><input type="checkbox"/></p>	<p>No</p> <p><input checked="" type="checkbox"/></p>
<p>N/A</p> <p>_____</p> <p>_____</p> <p>_____</p>		
<p>4. Does the Applicant, or any Owner or Interest Holder have any “material financial interest or control” (as defined in § 1.1.1(A)(30) of the</p>	<p>Yes</p> <p><input checked="" type="checkbox"/></p>	<p>No</p> <p><input type="checkbox"/></p>

Regulations) in another Rhode Island licensed cultivator, a compassion center, a licensed cooperative cultivation, or a Rhode Island DOH-approved third party testing provider or vice versa. If “Yes” describe below:		
<p>On November 17, 2020, the Department of Business Regulation</p> <hr/> <p>granted Cann Cure Cultivation, LLC a Class A Medical Marijuana</p> <p>Cultivator License numbered MMP CV 0072.</p> <hr/>		
5. Applicant acknowledges that it fully understands that:		
a. Marijuana is a Schedule I controlled substance under the Controlled Substances Act of 1970 (21 U.S.C. 801 <i>et seq.</i> );	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
b. The manufacturing, distribution, cultivation, processing, possession, or possession with intent to distribute a Schedule I controlled substance, or conspiring or attempting to do so, are offenses subject to harsh penalties under federal law and could result in arrest, prosecution, conviction, incarceration, fine, seizure of property, and loss of licenses or other privileges;	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
c. Any activity regarding marijuana that does not comply with Rhode Island law or regulations is a violation of State law and could result in arrest, prosecution, conviction, incarceration, fine, seizure of property, and loss of licenses or other privileges; and	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
d. Applicant must comply with the requirements of R.I. Gen. Laws § 21-28.6-12(c)(7) and § 1.4(C) of the Regulations pertaining to criminal identification records checks prior to licensure.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6. Applicant acknowledges that Application Fees are non-refundable.	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7. Applicant acknowledges that in filing an Application for a license, the following:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<p>a. The Department of Business Regulation is vested with certain authority and discretion under the Act and Regulations with respect to review and approval of a Compassion Center License; and</p> <p>b. The Department of Business Regulation’s decision in approving or denying an Application shall be final subject to the provisions of the Administrative Procedures Act codified in R.I. Gen. Laws § 42-35-1 <i>et seq.</i></p>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Updated to 7/16/2020

The undersigned hereby acknowledges and agrees that Applicant/Licensee has a continuing obligation to disclose any changes and shall provide written notice to the Department within thirty (30) days of any change of the information provided and the certifications made in this Form 3 and that each such notice shall include an updated Form 3.

Under penalty of perjury, I hereby declare and verify that all statements on and information submitted with this Form 3 are complete, true, correct, and accurate.

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo

Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Compassion, Inc.

**CC FORM 4**  
**CERTIFICATION REGARDING NONPROFIT STATUS AND**  
**COMPLIANCE**

The undersigned duly authorized signatory of Applicant/Licensee, in his/her capacity as such, for and on behalf of Applicant/Licensee, after due inquiry, hereby certifies to the Office of Cannabis Regulation of the Department of Business Regulation (the “Department” or “DBR”) as follows:

1. Nonprofit Status and Operation

- A. The Applicant/Licensee is and shall be operated on a not-for-profit basis for the mutual benefit of its patients in compliance with The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act, Chapter 21-28.6 of the Rhode Island General Laws and the regulations promulgated thereunder.
- B. Compassion centers shall not be organized, structured or operated in a manner that violates R.I. Gen. Laws § 21-28.6-12(f), or which would cause medical marijuana and medical marijuana products to be priced at unreasonable rates, as determined by DBR, in accordance with R.I. Gen. Laws § 21-28.6-12(d)(2)(iii).
- C. The Applicant/Licensee is a nonprofit corporation organized, existing and in good standing under the laws of the State of Rhode Island, including the Rhode Island Nonprofit Corporation Act, R.I. Gen. Laws Chapter 7-6, as evidenced in Annex A attached hereto, which includes the following documents:
  - i. A written overview of Applicant’s corporate structure as a nonprofit entity, a listing of all board members, officers, and other key persons along with copies of their resumes, job descriptions, roles and duties.
  - ii. Applicant’s nonprofit Articles of Incorporation filed with RI Secretary of State (SOS) in accordance with R.I. Gen. Laws Chapter 7-6;
  - iii. Applicant’s corporate Bylaws;
  - iv. Applicant’s Certificate of Good Standing from the RI SOS; and
  - v. If applicable, documentation evidencing tax-exempt organization status under US Internal Revenue Code.

2. Management Companies and Vendors

- A. All contracts and agreements, including any loan or other financing agreements, with all management companies and vendors shall be on commercially reasonable terms and provide for compensation/remuneration at fair market value for the subject services, supplies, equipment, and other goods.
- B. Attached hereto as Annex B is a list of all management companies used/to be used to supply services, supplies, equipment and/or other goods to the compassion center Applicant/Licensee. This list must also include a list of all persons (names and addresses)

who have any ownership or financial interest (officers, directors, stockholders of 5% or more, LLC managers or members, and/or partners) in or operations or managerial control over the management company.

- C. Attached hereto as Annex C is a list of all anticipated vendors used/to be used to supply services, supplies, equipment and/or other goods to the compassion center Applicant/Licensee of \$100,000 or more per calendar year. This list must also include a list of all persons (names and addresses) who have any ownership or financial interest (officers, directors, stockholders of 5% or more, LLC managers or members, and/or partners) in or operations or managerial control over the management company.
- D. Attached hereto as Annex D are copies of any/all agreements, contracts and proposals with management companies, vendors, or other contractors, including copies of any proposed management agreements, leases, loans, contracts, or any other documentation reflecting the terms and conditions of any relationships and/or interests between the nonprofit entity and these agents, persons, or entities. Applicant must include any subsidiaries/parent companies associated with these agents, persons, or entities in the overview and organizational chart and/or any other entities engaged in similar cannabis activities which have shared owners, officers, directors or key persons.

3. Related Party Transactions

- A. Attached hereto as Annex E is a list of all financial transactions between Applicant/Licensee, on the one hand, and any immediate family member(s)<sup>1</sup> (whether directly or through an entity in which such family member(s) has an interest) of an officer, director, manager or other person having managerial or operational control of Applicant/Licensee, on the other hand.
- B. All such financial transactions are on commercially reasonable terms and provide for compensation/remuneration at fair market value for the subject matter thereof.

4. Real Estate and Equipment

- A. Attached hereto as Annex F is a list of all real estate to be purchased or leased by Applicant/Licensee; and
- B. Attached hereto as Annex G is a list of all equipment to be purchased or leased by Applicant/Licensee involving compensation/remuneration of \$100,000 or more per calendar year.
- C. Such purchase and lease transactions are on commercially reasonable terms and provide for compensation/remuneration at fair market value for the subject matter thereof.

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<sup>1</sup> "Family members" means and includes a spouse, parent, grandparent, child, brother, sister, mother-in-law, father-in-law, brother-in-law, sister-in-law, daughter-in-law, son-in-law and includes adopted, half and step members.



5. Compensation of Officers, Directors and Employees

A. Attached hereto as Annex H is a schedule of annual compensation as to:

- i. All officers, directors, managers, and other persons having managerial or operational control of Applicant/Licensee; and
- ii. The ten (10) other persons with the highest-level annual compensation.

B. Applicant/Licensee is in compliance with the compensation, dividend and loan provisions of the Rhode Island Nonprofit Corporation Act, R.I. Gen. Laws Chapter 7-6, including §§ 7-6-26.1, 7-6-31, and 7-6-32.

6. Revenue Sharing

Applicant/Licensee is not and shall not become a party to any revenue or profit-sharing agreements or other arrangements involving sharing of, or compensation/remuneration based upon a percentage of, the compassion center's revenues or profits.

The undersigned hereby acknowledges and agrees that Applicant/Licensee has a continuing obligation to disclose any changes and shall provide written notice to the Department within thirty (30) days of any change of the information provided and the certifications made in this Certification and that each such notice shall include an updated Certification and all annexes hereto.

Under penalty of perjury, the undersigned hereby declares and verifies that all statements on this Certification are complete, true, correct and accurate and all applicable information and deliverables required by this form are attached in Annexes A through H.

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Compassion Inc.

**INSTRUCTIONS FOR CC FORM 4 ANNEXES**

**Attach separate pages for each Annex, A through H, to CC Form 4. If the information to be provided on any Annex is "none", put "none" on that Annex page.**

**The materials must demonstrate Applicant's understanding of and ability to comply with the requirements under the Act and the Regulations.**

**CC FORM 5**

**BUSINESS LICENSE IDENTIFICATION FORM**

Applicant hereby state(s) as follows:

With respect to Applicant and any Owner or Interest Holders described in Form 2, Section I, such persons have either applied for or are currently or have been previously licensed, registered or authorized to produce or otherwise deal in the manufacture or distribution of marijuana in any form, in the below states or jurisdictions and corresponding agency or authority.

State & Name of Agency	Type of License	Name of Licensee	License or Registration #
Department of Business Regulation	Class A Medical Marijuana Cultivator License	Cann Cure Cultivation, LLC	MMP CV 0072

Applicant disclosed and provided any and all denial, suspension, revocation, fines, or other sanction of the license, registration or authorization listed above as instructed in CC FORM 3.

Applicant hereby authorizes: (1) the Rhode Island Department of Business Regulation to contact the agencies indicated above for information regarding Applicant and the licenses/registrations listed above; and (2) such other state agencies to provide any and all information requested by the Department regarding the licenses/registrations. If requested by the Department, Applicant will provide any additional authorization required by any of the state agencies in order to provide information requested by the Department.

The undersigned hereby acknowledges and agrees that Applicant/Licensee has a continuing obligation to disclose any changes and shall provide written notice to the Department within thirty (30) days of any change of the information provided and the statements made in this Form 5 and that each such notice shall include an updated Form 5.

Updated to 7/16/2020

Under penalty of perjury, I hereby declare and verify that all statements on and information submitted with this Form 5 are complete, true, correct, and accurate.

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo

Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Cultivation LLC

## **Part 5 – Compassion Center Application Required Exhibits**

### **CC Exhibit A – Disclosure of Material Financial Interests/Divestiture Plan**

Attach hereto as CC Exhibit A is Applicant's complete disclosure statement of any material financial interests or control in another Rhode Island compassion center, cultivator, cooperative cultivation, or other marijuana establishment licensee and a plan of divestiture in compliance with §§ 1.2(C)(4)(i) & 1.2(F)(7). Please review the definition of "material financial interest or control" in § 1.1(A)(30) of the Regulations.

The materials must demonstrate Applicant's understanding of and ability to comply with the requirements under the Act and the Regulations.

**[ATTACH AND SIGN BELOW – If None, state "None" and Sign]**

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name  
Print Title: Compliance Officer  
Print Name of Applicant/Licensee: Cann Cure Compassion Inc.

**CC Exhibit A – Disclosure of Material Financial Interests/Divestiture Plan**  
Cann Cure Compassion, Inc.

None.

### **CC Exhibit B – Compliance Plan**

Attach hereto as CC Exhibit B evidence of appointment of a Compliance Officer for the proposed Compassion Center including Applicant's legal and operational compliance plan in accordance with § 1.2(C)(4)(l) of the Regulations.

The compliance plan must include, without limitation, a written description of Applicant's policies, procedures, and plan with regard to patient privacy, sales to out-of-state patients, procedures for access to restricted areas, affiliations with local patient and community organizations, employee/workplace drug use policies/procedures, compliance testing policies/procedures, and Applicant's proposed policies/procedures/mechanisms to ensure compliance with prohibited financial interests and, if applicable, the additional requirements for establishing and maintaining its nonprofit status.

The plan and materials must demonstrate Applicant's understanding of and ability to comply with the requirements under the Act and the Regulations.

### **[ATTACH AND SIGN BELOW]**

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo

Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Compassion Inc.

## **CC EXHIBIT B – COMPLIANCE PLAN**

Pursuant to the Applicant's Articles of Incorporation, Garret Cardillo was appointed as Cann Cure Compassion Inc.'s Compliance Officer for its proposed compassion center. In accordance with § 1.2(C)(4)(1) of the Regulations, please find below Cann Cure Compassion Inc.'s legal and operational compliance plan.

### **I. Patient Privacy**

All staff at Cann Cure Compassion Inc. will be trained to follow all required HIPPA compliant protocols. HIPPA certification process will be required through HIPPATRAINING.COM prior to interacting with patients or having access to sensitive or private information.

Any release of a Patient's private information will need to be verified by the Compliance Officer who will ensure all required patient signatures are in place on our authorization form prior to any release of said information.

All employees will have access to the resources below.

The Human Resources Department will ensure all new employees who will be accessing any private information will not be allowed to work or volunteer without a current HIPPA certification. All certifications will be scanned and saved within each employee or volunteer's file in the Company's database and records management. Human Resources will also ensure that all regulations are followed regarding HIPPA requirements.

### **II. Sales to Out-of-State Patients**

Cann Cure Compassion Inc. uses reasonable good faith efforts to verify that each out of state patient cardholder possesses a current, valid registration card issued lawfully under the issuing state's medical marijuana program. These good faith efforts shall include requiring presentation of the patient's medical marijuana registration card (or equivalent document provided by the issuing state) and one other form of government issued photo identification. Copies of such cards shall be maintained for the compassion center's records.

Cann Cure Compassion Inc. requires each out of state patient cardholder to complete an intake form (which form is acceptable to the Department) and inputs the intake information, including the home state card registration number (or if the home state registration number is not available, a unique identifier assigned by Cann Cure Compassion Inc.), into its tracking system.

Cann Cure Compassion Inc. logs and tracks all transactions with each out of state patient cardholder in the tracking system by the issuing state's patient card registration number and otherwise in the same manner as it uses to log and track transactions with Rhode Island resident patient cardholders.

Cann Cure Compassion Inc. maintains the same standards of confidentiality as to each out of state patient cardholder's information as it does for information regarding Rhode Island patient cardholders.

Cann Cure Compassion Inc. provides to each out of state patient cardholder a disclosure form (which form is acceptable to the Department) regarding requirements and prohibitions under the Act and Regulations that are applicable to dispensing and use of medical marijuana within the State of Rhode Island, including without limitation disclosures regarding marijuana dispensing and possession limits, prohibition of taking marijuana and marijuana products across state lines and prohibition of smoking in public places.

Cann Cure Compassion Inc. provides training to its employees, agents and volunteers regarding its policies and procedures for dispensing to and transactions with out of state patient cardholders.

Records regarding dispensing and transactions with out of state patient cardholders and applicable policies and procedures shall be maintained in compliance with and subject to inspection and review in accordance with the compassion center's records retention policies and the Regulations.

### **III. Procedures for Access to Restricted Areas**

Please see our Procedures for Access to Restricted Areas SOP. All Cann Cure Cultivation Staff will have knowledge of where the restricted areas are located within all facilities and who has access to them. The Human Resource Manager and Chief Security Officer / Consultant will approve access limitations which is mostly declared within our **Staff Duties, Authority, Responsibilities, Qualifications and Supervision Policy**.

If other Staff Members need to access the Restricted Area for legitimate purposes, those employees shall be provided with escorted and monitored access per an approved Cann Cure Cultivation Staff Member.

Restricted areas shall be clearly marked with a sign that shall be at a minimum 12" x 12" and that states, "Do Not Enter - Restricted Access Area - Authorized Personnel Only" in lettering no smaller than one inch in height.

Employee key card badges shall be preprogrammed to gain access or a key shall be allowed per regulations.

A report shall be filled out anytime anyone enters a restricted area. The report shall include the name of the person accessing the area, the date, time, and reason for the access and the name of the escort.

Any employee found inside of a restricted area without an escort shall be reported immediately to Security and a report shall be generated and investigation commenced.

The Restricted Areas within the facilities shall be accessed through a key card or badge system programmed by Cann Cure Compassion Inc.'s contracted and certified alarm company in accordance with the Department's regulations. An electronic record shall be recorded each time a key card or badge is used to gain access to a Restricted Area. The Human Resource Department and Security Department will determine the levels of access allowed to each employee.



Cann Cure Cultivation keys to the restricted areas shall be locked inside of the security office or as determined per policy. A sign out sheet shall be kept noting who accessed the keys, the reason for such access and the name of the escort accompanying the party entering the Restricted Area.

#### **IV. Affiliations with Local Patient and Community Organizations**

Cann Cure Compassion Inc. will have outreach activities directed towards the community and our authorized clientele, specifically registered qualifying patients, registered primary caregivers, and authorized purchasers for registered qualifying patients.

Cann Cure Compassion Inc. has contacted Veterans Organizations, and will contact mental health advocates and other medical groups that often seek the recuperative effects of medical marijuana to treat PTSD, as other mental health issues are tied into this unfortunate diagnosis and often treated with medical marijuana.

Cann Cure Compassion Inc. has contacted the President of Habitat for Humanity where preliminary agreements have been made to make financial contributions but to also recruit Cann Cure Cultivation staff to volunteer in projects. Cann Cure Compassion Inc.'s Treasurer is also on the Board of Directors of Habitat for Humanity.

Cann Cure Compassion Inc. has contacted South County Charities for creative ideas to assist those in need on more of an individual level. Cann Cure Compassion Inc.'s Compliance Manager is the Co-Founder of this non-profit and will assist Cann Cure Compassion Inc. in non-profit affairs and in helping the community.

Cann Cure Compassion Inc. will align with a local diversion DARE-type program to help oversee policies and practices along with educational opportunities, inside and outside of our walls. Cann Cure Compassion Inc. will strive to keep cannabis away from those unauthorized users and will employ trained employees and security to identify suspected diversion or other suspicious behaviors.

Cann Cure Compassion Inc. will also work with local doctors and other medical professionals to cooperatively work to find the best medicine and delivery methodology for the qualified patients. Cann Cure Compassion Inc. will provide all applicable usage techniques and any corresponding safety information to all patients, caregivers, or interested parties. We have created extensive educational tools that communicate potential side effects as well.

Cann Cure Cultivation intends to take a medicine first approach to its pharmacological treatment offerings. An intake meeting with each patient (or their caregiver) will be conducted to understand the particular ailments being treated. Regular follow up consultations with each patient (or their caregiver) will be performed to discuss the efficacies of the medicine and to see what changes could be made to achieve better outcomes. Cann Cure Compassion Inc. will also offer consultations either over the phone, or through secure video conferencing platforms, such as Zoom, for those patients interested in communicating with Cann Cure Compassion Inc. without having to come to its building.

Cann Cure Compassion Inc. will offer out to the wider interested community the use of their conference room, once in person gatherings are allowed per DOH regulations, for group therapy sessions or community meetings. It is invaluable to let people network together, identify each other's struggles, and find the best ways to proceed. Therapy sessions will be offered to Veterans; however, we will always keep an eye on the community and allow most to benefit from group therapy sessions.

During these difficult times, Cann Cure Cultivation will protect our patients by exceeding COVID regulations. Safety measures, such as breath shields at each customer service station will be installed and regular and fastidious cleaning with disinfectants to all common surfaces will be employed. Cann Cure Compassion Inc. will also be able to serve its clientele by having them order via our website, or to call ahead to prepare their order in advance, for curbside pick up service for those immunocompromised patients, handicap patients, those 65 years or older, or per a medical practitioners note. Cann Cure Compassion Inc. will take industry leading measures to protect its patients, caregivers and their authorized purchasers.

In order to promote and differentiate Cann Cure Compassion Inc.'s offerings to its authorized clientele, Cann Cure Cultivation will offer a loyalty program where patients are automatically enrolled into our program to earn loyalty rewards towards Cann Cure Compassion Inc.'s variety of other offerings, such as discounts on clothing, therapeutic massage at area licensed therapists, discounts at area museums and other offerings of interest.

#### **V. Employee/workspace Drug Use Policies/Procedures**

Cann Cure Compassion Inc. will not permit the use of drugs or alcohol, including marijuana or marijuana products on the premises of either the compassion center or associated cultivation facility, including parking areas that are designated for Cann Cure Cultivation staff and clientele or otherwise under the control of Cann Cure Compassion Inc..

Cann Cure Compassion Inc. will maintain a strict drug and alcohol free workplace policy. Any employee, or volunteer that is suspected of being under the influence of drugs or alcohol while at work will immediately be reported to the Manager on duty and will be suspended from their duties until the matter has been properly addressed.

Cann Cure Compassion Inc. will place "No Smoking" signs on the interior and exterior of the business.

#### **VI. Compliance Testing Policies/Procedures**

Cann Cure Compassion Inc. understands that testing is an ongoing process being introduced in phases. Cann Cure Compassion Inc. will monitor all DBR bulletins for updates and respond accordingly. Cann Cure Compassion Inc. understands the immediate need for proper testing of all of its cannabis in order to provide the proper potency and other identifiable attributes of the medicine. Failure to label potency properly or by not identifying all other attributes, can lead to customers over consuming, which can have dangerous consequences for the patient. The most important compound to label on a cannabis product is the amount of THC in the product. In edibles, this number will be in a form of milligrams of THC in the product. In combustible

products, the amount of THC in the product will be displayed as a percentage of the weight of the combustible product.

Cann Cure Compassion Inc. will explore and begin the testing process for total THC and total CBD for flower products in accordance with Rhode Island General Laws § 21-28.6-12 et seq., and the Rules and Regulations Related to the Medical Marijuana Program Administered by the Department of Business Regulation 230-RICR80-5-1 et seq., as amended (the “Regulations”).

All documentation and lab results will be scanned and saved both on our internal network and our “Cloud Storage” site per DBR regulations.

Testing is imperative to the health and safety of our patients. All cannabis testing results are saved both as paper copy and scanned and stored on our physical hard disk system as well as sent to our “cloud” server. The lab results are always sent to management, as well as quality control and to the master grower to provide input on any issues that may arise.

## **VII. Cann Cure Compassion, Inc.’s Proposed Policies/Procedures/Mechanisms to Ensure Compliance with Prohibited Financial Interests**

Please see our Financial Ethics and Compliance Policy and Financial Oversight and Compliance SOP.

Cann Cure Compassion Inc. strives to create a culture that embodies the ethics of going beyond the letter of the law, by creating a system of checks and balances and to create an environment where everyone is encouraged to live up to the spirit and the letter of the law. Cann Cure Compassion Inc. understands the strict requirements of proper compliance to adhere with all applicable local, state, and federal laws. Integral to our company's integrity, we will ensure that our record keeping is properly formatted, truthful, timely and transparent. The Cann Cure Cultivation staff of Cann Cure Compassion Inc., and the hired financial advisors, accountants, legal team and other third parties who understand their fiduciary responsibilities to Cann Cure Compassion Inc. and to the Department.

This proposed Financial Ethics and Compliance Policy is to ensure compliance with prohibited financial interests and, if applicable, the additional requirements for establishing and maintaining Cann Cure Compassion Inc. as a non-profit status.

Cann Cure Compassion Inc. will always be committed to keep up with applicable local, state, and federal laws as part of our company's integrity. Cann Cure Compassion Inc. will ensure that our record keeping is properly formatted, truthful, timely and transparent. This level of fiduciary responsibility will be expected from the Treasurer or any outside third party financial advisors or accountants who help prepare the Financial Reporting. These will be provided as requested on a timely basis. Upon request, financial information may be reviewed, monthly, quarterly, or yearly. Cann Cure Compassion Inc. will be prepared to supply all financial documents and to assist investigators in any way in the event of an audit by State or Federal officials.

Cann Cure Compassion Inc. will strive to create a culture that embodies ethics of going beyond the letter of the law, by creating a system of checks and balances in all aspects of the

business. We will strive to create an environment where everyone is encouraged to live not only by the spirit of the law but the letters of it too.

Cann Cure Compassion Inc. will be a company that has created any environment that believes in Integrity from the top down. Our senior management will work with our management team to create these ethical policies and make sure they are re-evaluated often to ensure they are meeting the standards of the company's by-laws and the local, state, and federal regulations.

Cann Cure Compassion Inc. will work with any Management Company to ensure that we keep up with compliance procedures in all avenues of the company. We will work with the management company and third party accountants to ensure we meet all local, state, and federal guidelines regarding Finance and Compliance.

A Cann Cure Cultivation Compassion Center and interest holders/key persons thereof will not have any "material financial interest or control" in another Rhode Island compassion center, a cultivator, or a licensed cooperative cultivation or vice versa. R.I. Gen. Laws §§ 21-28.6-12(b)(1)(ii) and 21-28.6-12(d)(5)(v).

Our senior management will work to create these ethical policies and make sure they are re-evaluated often to ensure they are meeting the required local, state, and federal regulations. Regular meetings, no less than quarterly will be held by the Management and its finance and legal teams to ensure financial compliance. In addition to all other specific record-keeping requirements of the Act, the DBR Regulations, and the DOH Regulations, Cann Cure Compassion Inc. will maintain the following records for a minimum of five (5) years:

- (a) All contracts and purchase orders, including documentation of any cancelled contracts or purchased orders and any contracts and purchase orders voided by replacement contracts.
- (b) Invoices and any supporting documentation of all marijuana purchases, acquisitions, transfers, and payments.
- (c) Contracts pertaining to the security alarm and security camera systems.
- (d) Contracts with vendors, including any approved third-party testing providers.
- (e) All records normally retained for tax purposes.
- (f) Complaints.
- (g) Management contracts.
- (h) Compensation records and financial statements.
- (i) Nonprofit corporate records including, but not limited to articles of organization, bylaws, meeting agendas, minutes and corporate resolutions.

#### **VIII. Additional Requirements for Establishing and Maintaining Cann Cure Compassion Inc. Non-profit Status**

Cann Cure Compassion Inc. will be organized, structured and operated as a nonprofit in compliance with R.I. Gen. Laws Chapter 7-6.

Cann Cure Compassion Inc. will at all times be operated on a not-for-profit basis for the mutual benefit of its patients in accordance with R.I. Gen. Laws § 21-28.6-12(f).

Cann Cure Compassion Inc. will not be organized, structured or operated in a manner that violates R.I. Gen. Laws § 21-28.6-12(f), or which would cause medical marijuana and medical marijuana products to be priced at unreasonable rates, as determined by DBR, in accordance with R.I. Gen. Laws § 21-28.6-12(d)(2)(iii).

Cann Cure Compassion Inc. will always have a continuing obligation to satisfy the requirements for licensure set forth in § 1.2.

**Accounting and Bookkeeping:**

- Cann Cure Compassion Inc.'s financial books and records will be kept on the accrual basis of accounting under U.S. generally accepted accounting principles (GAAP).
- Cann Cure Compassion Inc. will utilize a very robust accounting system with a chart of accounts that can track all activities for all costs of goods sold, sales & marketing costs and general & administrative expenses using industry specific software that integrates with other accounting software, i.e. QuickBooks.
- Cann Cure Compassion Inc.'s management, Officers and Board Members will have oversight of all financial statements on a monthly and quarterly basis.
- Cann Cure Compassion Inc. will regularly address the financial condition of the company to ensure the Company is tracking towards a sustainable financial plan and cash flow for its operations and continued success.
- Cann Cure Compassion Inc. will have an independent certified public accountant review or audit the statements no less than annually.

**IX. Internal Control Procedures:**

Cann Cure Compassion Inc. will take every precaution to minimize the risks associated with this industry, especially the temptations that arise in a 'cash intensive' business environment. While Cann Cure Compassion Inc. will request approval for Debit and Credit Card transactions, and is exploring other means to collect payments (e.g. electronic payment systems like PayPal, Venmo, Zelle and Google Pay, Apple Pay, Cash App to name a few) in an ever evolving financial environment to reduce unwanted liability. All payment options will be approved by the DBR.

Cann Cure Compassion Inc.'s banking institution is Greenwood Credit Union at 2669 Post Road, Warwick, Rhode Island 02886. Cann Cure Compassion Inc. has met with banking representatives to establish necessary protocols that follow DBR requirements, as well as the bank's. Our team has an established account for a cultivation business. Cann Cure Compassion Inc.'s Security member or Treasurer will be responsible for taking the Cash Deposits to the bank daily, and providing detailed documentation to the Finance Manager or Treasurer for input into the accounting software.

Cann Cure Compassion Inc.'s Finance Manager will be responsible for the following:

- Record Deposits in Accounting System once a deposit is made by Security or Treasurer.
- Process Vendor Bills and prepare payments ready for Treasurer/President to process. These will be provided at least once a week.
- All bank accounts will be reconciled on a monthly basis, which will be performed upon receipt of the bank statement.
- Produce financial reports about 10 days after the end of the month for Management Company and Company Officers.
- Work with the Management Company on cross training procedures to allow continuity during the year.
- Work with Management Company, Compliance Manager & Security Officers.
- Establish Internal controls on which Managers, Board Members, and employees have access to different parts of the computer systems, such as Quick Books and the Seed to Sale software.
- Work with Management Company on Inventory Controls Systems in order conduct surprise "Spot Checks" of Inventory, perform monthly and quarterly inventories, and coordinate with auditors to perform no less than annual audits of the financial statements and inventory controls.
- Investigate Discrepancies either Inventory or financial records.
- Establish Check Writing Procedures in order to set amount limits and spread out the check writing responsibilities.
- Interact with the Management Company and established payroll company in order to comply with all regulations related to payroll, such as verifying time cards before payroll is submitted.
- Work with Cann Cure Compassion Inc.'s accountants and tax advisors to make all required tax payments.
- Set Up a chain of command regarding supply ordering.
- Cann Cure Cultivation will use various filing systems in order to properly track its files, which shall include the highly technical secure cloud based backup files and the low tech of maintaining paper filing systems for each department.

- Work with Compliance Officers to oversee all Vendor and Management contracts and verify there are systems in place that are fully compliant with all necessary regulations.

### **CC Exhibit C– Business Plan**

Attach hereto as CC Exhibit C Applicant's Business Plan for the Compassion Center with all information and in compliance with § 1.2(C)(4)(c) of the Regulations.

The business plan must demonstrate Applicant's understanding of and ability to comply with the requirements under the Act and the Regulations, likelihood of success, and include without limitation:

- a. Applicant's experience running a non-profit organization or other business, and applicant's experience running a medical marijuana business, as applicable;
- b. Detailed description of amount and source of equity, debt and operating capital for the proposed compassion center, including financial statements or other documentation establishing the source of any funds;
- c. Start-up funding and long-term financial feasibility plan;
- d. Detailed timeline for initiating operations;
- e. Funds for capital improvements and operating needs;
- f. Financial capability;
- g. Financial oversight and compliance plan;
- h. Services for hardship patients and charity care;
- i. Three (3) year projected income statement;
- j. Number and category description of FTEs (full time equivalents) and associated payroll expenses (with benefits) required for staffing;
- k. Description of products and services;
- l. Marketing, promotional and sales plan including pricing strategy;
- m. Industry and market assessment and analysis; and
- n. Segment and customer profile.

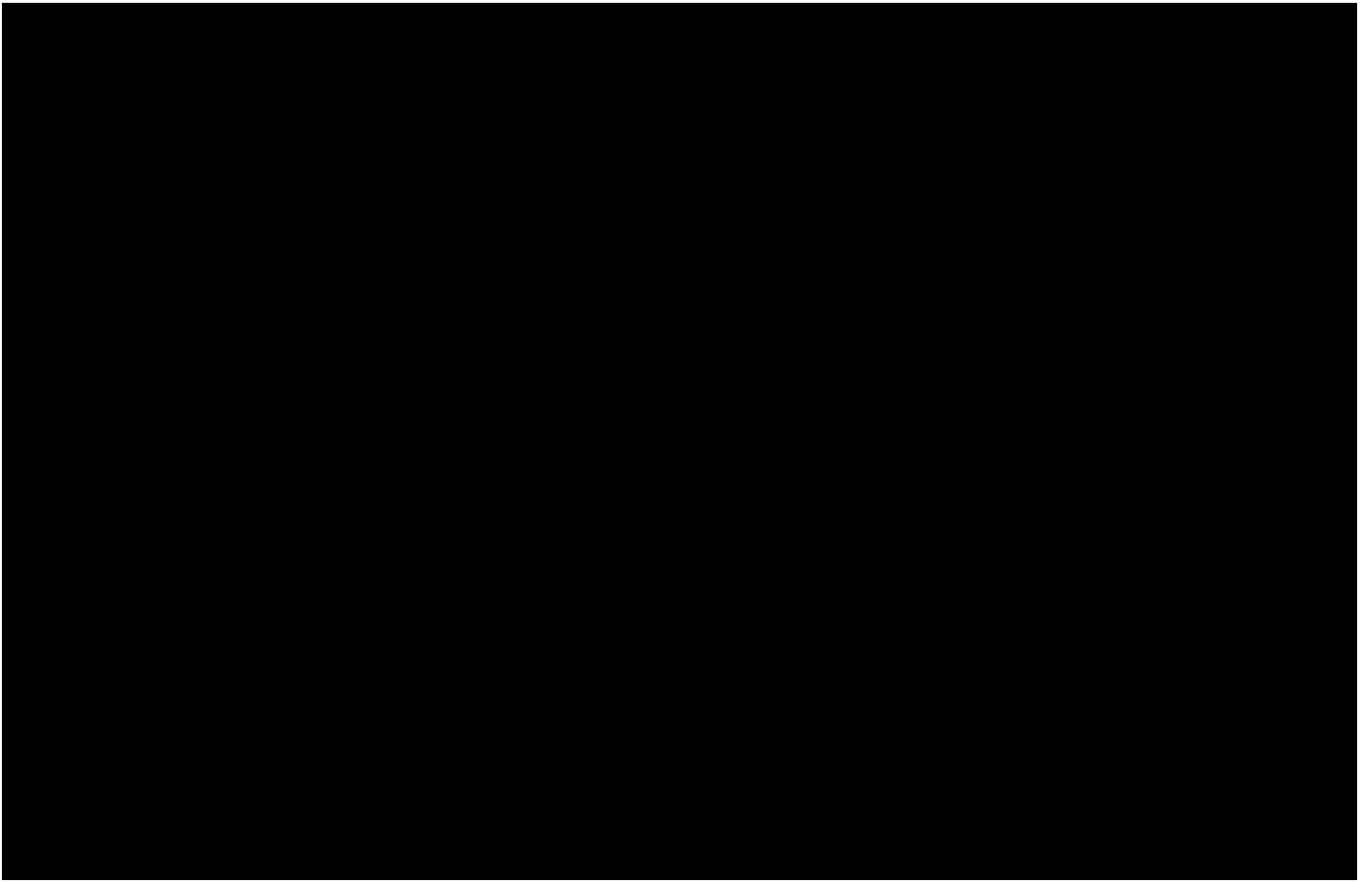
### **[ATTACH AND SIGN BELOW]**

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name  
Print Title: Compliance Officer  
Print Name of Applicant/Licensee: Cann Cure Compassion Inc.





### **CC Exhibit D- Security and Safety Plan**

Attach hereto as CC Exhibit D Applicant's Security and Safety Plan for the Compassion Center with all information in compliance with § 1.2(C)(4)(d) of the Regulations.

The security and safety plan must demonstrate Applicant's understanding of, and ability to, comply with the requirements under the Act and the Regulations and shall include without limitation a description of:

- (a) Security equipment including hardware, software applications, and compliance with industry standards and specifications;
- (b) Applicant's security and safety plan with regard to third-party vendors;
- (c) Applicant's security and safety plan with regard to Standard Operating Procedures;
- (d) Applicant's security and safety plan with regard to cash management and/or electronic payment processing, as applicable;
- (e) Applicant's security and safety plan with regard to confirmation of a secured deposit banking account or proposed plan to obtain such account prior to beginning the proposed licensed activities;
- (f) How Applicant would train all employees and registered Compassion center agents on security procedures;
- (g) How Applicant would train all employees and registered Compassion Center agents on safety procedures, including but not limited to responding to a (1) medical emergency, (2) a fire, and (3) a chemical spill;
- (h) How Applicant would train all employees and registered Compassion Center agents on safety procedures including responding to threatening events, such as an armed robbery, an invasion, a burglary, and any other criminal incident;
- (i) How Applicant would secure the licensed premises and facility to prevent unauthorized entry in accordance with the Regulations;
- (j) How the premises and facility will be equipped with a security alarm system that:
  - 1. secures and monitors the entire perimeter;
  - 2. is continuously monitored; and
  - 3. is capable of detecting power loss/interruption in accordance with the Regulations;
- (k) How the premises and facility will be protected by a video surveillance recording system to ensure surveillance of the entire licensed premises and adherence to the video surveillance requirements in accordance with the Regulations;

- (l) How a video surveillance system will be supported by adequate security lighting in accordance with the Regulations;
- (m) How Applicant would maintain a security alarm system that covers all perimeter entry points and portals at all premises;
- (n) How the security system will be:
  - 1. Continuously monitored,
  - 2. Capable of detecting smoke and fire, and
  - 3. Accessible via remote feed to the Department of Business Regulation in accordance with the Regulations.
- (o) How security footage and equipment will be stored and secured in accordance with the Regulations.
- (p) How Applicant will maintain a video surveillance recording system at all premises that:
  - 1. Records all activity in images of high quality and high resolution capable of clearly revealing facial detail;
  - 2. Operates 24-hours a day, 365 days a year without interruption; and
  - 3. Provides a date and time stamp for every recorded frame.
- (q) How the surveillance camera(s) will be located and operated to capture each exit from the premises;
- (r) How the surveillance camera(s) will capture activity at each entrance to an area where medical marijuana and medical marijuana products are located;
- (s) How the recording of security video surveillance shall be made available to the Department of Business Regulation or law enforcement in accordance with the Regulations;
- (t) How Applicant will, when visitors are admitted to a non-public area of the licensed premises:
  - 1. Log the visitor in and out;
  - 2. Continuously visually supervise the visitor while on the premises; and
  - 3. Ensure that the visitor does not touch any medical marijuana or medical marijuana products.
- (u) Applicant's policies and procedures for maintenance of a log of all visitors;
- (v) The process Applicant will follow in reporting a theft or diversion to:
  - 1. the Department of Business Regulation; and
  - 2. Rhode Island State Police in accordance with the Regulations.
- (w) How Applicant will ensure that it, or a registered agent thereof, will not distribute any medical marijuana or medical marijuana products to any person if the licensee or registered

agent knows, or may have reason to know, that the distribution does not comply with the Act or the Regulations;

- (x) How Applicant will record and execute the transfer of medical marijuana from licensed medical marijuana cultivators in accordance with the Regulations; and
- (y) How Applicant will record and execute the transfer of medical marijuana to a patient cardholder, caregiver cardholder, or authorized purchaser cardholder in accordance with the Regulations.

**[ATTACH AND SIGN BELOW]**

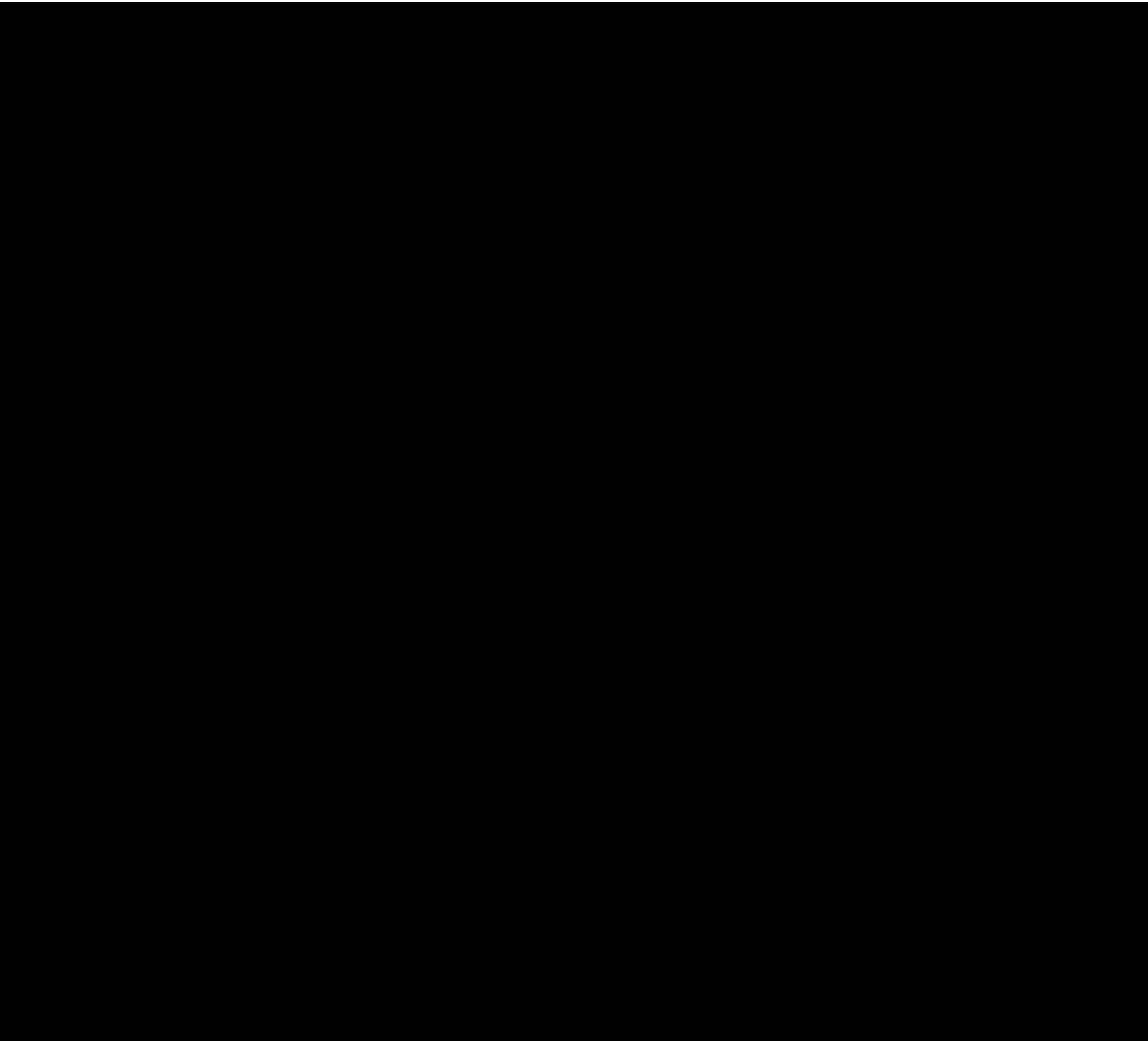
Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Compassion Inc.



## **CC Exhibit E – Operations Manual Required Content**

Attach hereto as CC Exhibit E Applicant's Operations Manual for the Compassion Center with all information and in compliance with § 1.2(C)(4)(e) of the Regulations.

The Operations Manual must include, without limitation, a written description of Applicant's policies, procedures and plans regarding:

- Patient intake and identification checks, patient education, patient feedback/product selection, any other proposed services to be provided at the Compassion Center;
- Point of sale tracking;
- Advertising;
- Vehicle/foot traffic impact and mitigation of community impact;
- Packaging and labelling;
- Complaints;
- Returns/refunds; and
- Product recalls.

The Operations Manual must demonstrate Applicant's understanding of and ability to comply with the requirements under the Act and the Regulations and include without limitation a description of:

- (a) The Applicant's biography including experience, knowledge, and training as it relates to:
  1. The marijuana industry in Rhode Island or any other state;
  2. Current role or participation in the Rhode Island Medical Marijuana Program;
  3. Past experience running a business or nonprofit;
  4. Familiarity with medical marijuana products and patients' utilization of products to treat qualifying conditions;
  5. Product testing and the use of seed to sale inventory tracking; and
  6. Any other background information or documentation Applicant believes demonstrates its qualifications to hold a compassion license.

If Applicant is currently a caregiver, licensed cultivator, or part of a licensed cooperative cultivation entity in Rhode Island, Applicant must include their registration ID number and how long they have been a caregiver or operating as a licensed cultivator or cooperative cultivation.

- (b) A list of proposed medical marijuana varieties and product types proposed to be offered.

- (c) A pricing model for how the price of products will be determined. Applicant must do this for products that will be procured from licensed cultivators as well as for products which may be manufactured by the compassion center if approved and/or applicable. This must include price ranges by categories of products (edibles, tinctures, vape cartridges, topicals, *etc.*) and/or any price structures which are based on levels of specific cannabinoids (THC, THCa, CBD, *etc.*). Applicant must state whether the compassion center would utilize pricing tiers for flower or any other categories of products and, if so, describe the general product requirements of each product as well as the price range per tier.

- (d) Any programs the compassion center would adopt to provide patients with discounted or free medicine. Applicant must include any qualifying factors it plans to use, if any, such as patient income, disability status, terminal diagnosis, or any other need-based criteria which the center may adopt.
- (e) How the Applicant would train all employees and registered compassion center agents on Federal and State medical marijuana laws and regulations as well as other laws and regulations pertinent to the compassion center agents' responsibilities.
- (f) How the Applicant would train all employees and licensed compassion center agents on standard operating procedures.
- (g) How the Applicant would train all employees and registered compassion center agents on detection and prevention of diversion of medical marijuana and medical marijuana products.
- (h) How the Applicant would establish written standard operating procedures for receipt of medical marijuana material and/or products, including how Applicant will inspect products for defects, contamination, and compliance with Regulations.
- (i) How the Applicant will use a perpetual inventory control system that identifies and tracks Applicant's stock of medical marijuana products from the time the medical marijuana is obtained by, or delivered to, a registered compassion center to the time it is sold or transferred to a patient cardholder, caregiver cardholder, or authorized purchaser in accordance with the Regulations. Applicant must address the situation in which it has access to the state approved Medical Marijuana Program Tracking System and the situation in which Applicant does not have access to the System (as specified in the Regulations).
- (j) How, as soon as is practical, if the Applicant does not have access to the state approved Medical Marijuana Program Tracking System, Applicant will, for each medical marijuana unit or product:
  - 1. Create a unique identifier;
  - 2. Enter information regarding the product/unit into an alternate inventory control system;
  - 3. Create a label with the unique identifier and batch number; and
  - 4. Securely attach the label to each unit/product.
- (k) How the Applicant will notify the Department of Business Regulation of an inventory or supply discrepancy if Applicant discerns a discrepancy between the inventory and the medical marijuana program tracking system.
- (l) How the Applicant will quarantine and not release any medical marijuana product if notified the product fails to meet all criteria for production or patient consumption in accordance with the Regulations.

- (m) In the case where faulty products have been sold or transferred to customers, how the Applicant will institute a recall and notify customers about the faulty products and what they should do if they still possess them.
- (n) How the Applicant will hold medical marijuana and medical marijuana products in secure and segregated storage.
- (o) How the Applicant, as a licensed compassion center, would establish procedures to receive, organize, store, and respond to all oral, written, electronic, or other complaints regarding medical marijuana and adverse events.
- (p) How the Applicant will ensure it does not transport medical marijuana or medical marijuana products to, or receive any medical marijuana or medical marijuana products from, any place outside of Rhode Island.
- (q) How the Applicant will have a standard operating procedure to require an employee or compassion center agent to report any personal health condition that could pose a threat to customers or compromise the cleanliness or quality of the medical marijuana products the employee/agent might handle.
- (r) How the Applicant will provide for disposal and segregated storage of any medical marijuana or product that is outdated, damaged, deteriorated, misbranded, or adulterated.
- (s) How the packaging and labeling of medical marijuana finished products will be in compliance with all applicable Regulations.
- (t) How a package of medical marijuana finished product will bear any allergen warning required by law.
- (u) How the Applicant will assure that a package of medical marijuana finished product does not bear any resemblance to the trademarked, characteristic, or product-specialized packaging of any commercially available candy, snack, baked good, or beverage.
- (v) How the Applicant will assure that a package of medical marijuana finished product does not bear any statement, artwork, or design that could mislead any person to believe that the package contains anything other than a medical marijuana finished product.
- (w) How the Applicant will assure that a package of medical marijuana finished product does not bear any cartoon, color scheme, image, graphic, or feature that might make the package attractive to children.
- (x) How the Applicant will ensure compliance with state and federal health and safety protocols, requirements and guidance with respect to the COVID-19 health pandemic.



**Exhibit E Signature page**

**[ATTACH AND SIGN BELOW]**

Garret Cardillo  
Signature of Authorized Signatory

12/14/2020  
Date

Garret Cardillo  
Printed Name

Print Title: Compliance Officer

Print Name of Applicant/Licensee: Cann Cure Compassion Inc.



## **CC Exhibit E – Operations Manual – Cann Cure Compassion Inc.**

### **Forward:**

This Operations Manual for Cann Cure Compassion Inc. includes all company specific information and is compliant with the DBR Regulations. The information contained with Exhibit E includes Cann Cure Compassion Inc. Company Materials, Standard Operating Procedures, Policies, Training Manuals, and our Employee Handbook

Cann Cure Compassion Inc. has developed several manuals, policies, plans, and standard operating procedures as guides. Our SOP's are crucial for our success and to our patients' safety while they also allow employees to obtain consistent answers to workflow situations required for the company to operate in a safe and efficient manner. Each Lead, Manager, Cultivator, and Officer will receive a copy or have access to all appropriate Manuals, SOPs, Policies, or Plan Books that best serves their role with the company.

Specific information required as part of the Application, Exhibit E (a) – (x) may be listed in detail within the Standard Operating Procedures (SOP), Policies, or Company Manuals.

Cann Cure Compassion Inc. is licensed and registered with the RI Secretary of State as a domestic not-for-profit corporation. Throughout this manual, the applicant will be referred to as CCC.



## **CC Exhibit E – Operations Manual**

### **Table of Contents**

- Patient Intake, Identification Check, and Educational Materials
  - Point of Sale Tracking
  - Advertising
  - Vehicle/Foot Traffic and Mitigation of Community Impact
  - Packaging and Labelling
  - Complaints
  - Returns/Refunds
  - Product Recalls
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- A. Applicants Biography
  - B. A list of proposed medical marijuana varieties and product types
  - C. Pricing Model
  - D. Hardship, Discounted, Free Medicine, and Charity Care Policy
  - E. Employees and/or Agent Training on Federal and State Laws and Regulations
  - F. Employees and/or Agent Training on Standard Operating Procedures
  - G. Training on Detection and prevention of Diversion of Medical Marijuana
  - H. Receipt of Medical Marijuana Material and/or Products SOP
  - I. Use of a Perpetual Inventory Control System
  - J. Medical Marijuana Program Tracking System
  - K. Inventory or Supply Discrepancy Reporting to DBR
  - L. Quarantining of Product that fails to meet required criteria
  - M. Notification and Recall of Faulty Products
  - N. Medical Marijuana and Medical Marijuana Products Secure Storage
  - O. Response to Patients Complaints and Adverse Events
  - P. Transportation and Receipt of Medical Marijuana within Rhode Island Only
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  - R. Disposal of outdated, damaged, deteriorated medical marijuana
  - S. Packaging and labeling of Medical Marijuana
  - T. Allergy Warning Labels on Medical Marijuana Packaging
  - U. Packaging does not resemble any commercially available product
  - V. Packaging does not resemble anything other than packaged Medical Marijuana
  - W. Package will not feature any graphics that may be appealing to children
  - X. Compliance with all health and safety protocols regarding COVID-19



### **Patient Intake, Identification Check, and Educational Materials**

CCC will follow all DBR regulations pertaining to the patient intake process. We have a mantrap designed on preliminary drawings where a patient will be required to show a medical marijuana card to enter the first door. The second door allowing entrance into the retail area will be locked as the purpose of the trap is to hold someone until approved for entry while never allowing both doors to be open. Within the lobby is a pass-through window to a receptionist. The receptionist is required to verify identity through an approved means along with checking on the validity of the license. New patients will need to fill out a new patient form with contact information prior to being allowed entrance for the first time. The contact and license information will be used to monitor purchasing trends on our medical marijuana tracking program or to track purchase amounts in order to monitor monthly limits. The receptionist will use an approved upon method by the DBR to verify the validity of the medical marijuana license. A copy of the driver's license will be retained as well. Following completion of these tasks the patient will be allowed into the retail area.

Each new patient will receive a frequently-asked-questions sheet created by the DBR or internally as allowed, explaining the limitations on the right to use medical marijuana under state law.

Each time a new, registered, qualifying patient visits a compassion center, it shall provide the patient with a frequently-asked-questions sheet, designed by the department, that explains the limitations on the right to use medical marijuana under state law.

CCC may conduct sales to out-of-state patient cardholders in accordance with R.I. Gen. Laws § 21-28.6-4(o), provided the receiving or purchasing patient has a valid medical marijuana card, or its equivalent, which has been issued by the applicable regulating authority for the medical marijuana program of the issuing U.S. state/jurisdiction/territory. The patient must also possess, and present valid government issued identification matching the name on their medical marijuana card.

Each patient verified pursuant to § 1.6.3(E)(2)(a), shall complete an intake form (upon a form acceptable to DBR) which includes at minimum the home state card registration number (or if the home state registration number is not available, a unique identifier assigned by the compassion center).

CCC will log and track all transactions with each out-of-state patient cardholder in the Medical Marijuana Program Tracking System according to the issuing state's patient card registration number or the unique identifier assigned to that person by CCC.

Out-of-state patient information shall be maintained confidentially per 1.6.6(D)(2).

CCC will provide each out-of-state patient cardholder with a notice regarding the requirements and prohibitions under the Act and any regulations promulgated thereunder that apply to



dispensing and use of medical marijuana within the State of Rhode Island, including without limitation notice of medical marijuana dispensing and possession limits, prohibition of taking medical marijuana and medical marijuana products across state lines and prohibition of smoking or using medical marijuana in public spaces.

### **Point of Sale Tracking**

A CCC principal officer, board member, agent, volunteer, or employee of a compassion center may not dispense more than two and one-half ounces (2.5 oz.) of usable marijuana, or its equivalent, to a qualifying patient directly or through a qualifying patient's primary caregiver or authorized purchaser during a fifteen-day (15) period.

A CCC principal officer, board member, agent, volunteer, or employee of a compassion center may not dispense an amount of usable marijuana, or its equivalent, to a patient cardholder, qualifying patient, a qualifying patient's primary caregiver, or a qualifying patient's authorized purchaser that the compassion center, principal officer, board member, agent, volunteer, or employee knows would cause the recipient to possess more marijuana than is permitted under the Edward O. Hawkins and Thomas C. Slater medical marijuana act.

CCC will utilize a database administered by the departments of health and business regulation. The database shall contain all compassion centers' transactions according to qualifying patients', authorized purchasers', and primary caregivers' registry identification numbers to protect the confidentiality of patient personal and medical information. Compassion centers will not have access to any applications or supporting information submitted by qualifying patients, authorized purchasers or primary caregivers. Before dispensing marijuana to any patient or authorized purchaser, the compassion center must utilize the database to ensure that a qualifying patient is not dispensed more than two and one-half ounces (2.5 oz.) of usable marijuana or its equivalent directly or through the qualifying patient's primary caregiver or authorized purchaser during a fifteen-day (15) period.

### **Advertising**

CCC will respect and abide by advertising Prohibitions R.I. Gen. Laws §§ 21-28.6-6(g)(8), 21-28.6-12(f)(1)(viii) and 21-28.6-16(b)

CCC will not advertise in a manner which is observed by or targets the general public. All advertising will be restricted to a registered patient audience.

CCC will not advertise or cause any advertising or agent to advertise in a manner that:

- Is attractive to persons under twenty-one (21) years of age
- Promotes non-medical use



- Promotes activity that is illegal under Rhode Island law
- Is contrary to or in direct violation of state or federal consumer protections
- Otherwise presents a significant risk to public health and safety.

CCC ensures that any advertising by or on behalf of a licensee will not:

- Contain statements that are deceptive, false or misleading.
- Display images or representations of marijuana plants, marijuana, or marijuana products.
- Display the consumption, use or transfer of marijuana or marijuana products.
- Include claims related to potency (beyond listing of cannabinoid content).
- Include any prices or the term “sale,” “discount,” “coupon,” “special” or similar terms.
- Depict activities or persons in conditions under the influence of marijuana, including but not limited to operating a motorized vehicle, boat or machinery, or persons who are pregnant or breastfeeding.
- Contain any content that can reasonably be considered to target individuals under the age of twenty-one (21), including but not limited to images of persons under twenty-one (21) years of age, cartoons, toys or similar images and items typically marketed towards persons under twenty-one (21) years of age or references to products that are commonly associated with persons under twenty-one (21) years of age or marketed to persons under twenty-one (21) years of age.
- Contain any imitation of candy advertising
- Include the term “candy” or “candies”
- Encourage the transportation of marijuana or marijuana products across state lines or otherwise encourage illegal activity.
- Assert that marijuana or marijuana products are safe because they are regulated by DBR or have been tested by a testing facility or otherwise make claims that any government agency endorses or supports marijuana.
- Make claims that marijuana has curative or therapeutic effects
- Contain any health or physical benefit claims, including but not limited to health or physical benefit claims on labels or packaging.
- Contain material that encourages excessive or rapid consumption.

CC will not:

- Make any deceptive, false or misleading assertions or statements on any informational material, any sign or any document provided to a patient, registered caregiver or authorized purchaser.
- Distribute handbills in public areas or on publicly owned property
- Advertise within the prohibited distance of one thousand (1,000) feet (or such greater distance if prescribed by the municipality in which the advertising is located) of the property line of an existing public or private school
- Advertise on television, radio, or print media



- Advertise in any manner that is viewable or can otherwise be perceived in a public space, including but not limited to billboards, bus wraps, benches, adopt a highway signs, or any format that may be viewable from roads or walkways.
- Engage in advertising via marketing directed towards location-based devices or electronic devices, including but not limited to cellular phones, unless the marketing is a mobile device application targeted to a registered patient audience and not a public audience, and that is installed on the device by the owner of the device who is a registered patient and includes a permanent and easy opt-out feature.
- Engage in any form of advertising which promotes application or enrollment into the program or the services of the practitioner or any other party which facilitates patient registration.
- Permit use of the licensee's trademarks, brands, names, locations or other distinguishing characteristics for third-party use on advertising in a manner that does not comply with § 1.10 of this Part or any other statute, rule or regulation.

In the event a third party has used a licensee's brand, trademark, brand name, location or other distinguishing characteristics in an advertisement that does not comply with § 1.10 or any other statute, rule or regulation, CCC will immediately notify the DBR and issue a cease-and-desist notice to such third party.

### **Digital, Electronic and Web-based Advertising**

In addition to complying with the advertisement criteria and prohibitions outlined above, advertising for CCC on a digital, electronic or web-based platform will:

- Utilize appropriate measures to ensure that individuals visiting the platform are over twenty-one (21) years of age and are authorized to use and/or purchase listed products. If appropriate measures to ensure that individuals visiting the platform are over twenty-one (21) years of age are not available, CCC will not advertise on such a platform.
- Not utilize unsolicited pop-up or banner advertising on the platform other than on age-restricted websites for people twenty-one (21) years of age and over who consent to view marijuana-related material.

### **Required Statements on all Advertising**

CCC will include the following statements on all advertising regardless of the medium:

- "For use only by qualified patients"
- The license number of CCC.

### **Vehicle/Foot Traffic and Mitigation of Community Impact**

The proposed location for Cann Cure Compassion Inc. (10 Messenger Drive, Warwick, RI 02888) is in a commercial industrial park, located on the corner of Bignall Street and Messenger



Drive, approximately 0.5 miles from Rt 95. The proposed location is surrounded by shipping/courier, engineering, and supply store businesses. The building is set back in this industrial park and is remote, therefore we do not anticipate foot traffic. Additionally, due to the nature of the business location and functionality of the industrial park, there is sufficient parking as well as street access.

Our proposed location to site Cann Cure Compassion Inc. is at 10 Messenger Drive, Warwick, RI 02888. We understand the concerns of our towns and neighbors quite well which is why we decided on this location. It lies adjacent to a commercial 4-lane highway, inside of an industrial park. The property is zoned commercial and characterized as large business.

CCC will strive to be a 'Good Neighbor.' We will collaborate with the Warwick Planning and Zoning departments for architectural improvements to the property. All signage will be in accordance with the Town of Warwick regulations. Billboard advertising will not be allowed on the property. Lighting will be kept to a minimum, providing enough lighting for security and safety of patients and staff. To obstruct the view of marijuana or marijuana products from the public, and as part of the safety plan, all windows will be covered to prevent people from looking into the facility. The property is in an industrial park allowing ample parking, thus reducing any waiting in the parking lot and adversely impacting the traffic. We do not anticipate any traffic impact on Messenger Drive.

We are committed to working with the Town of Warwick to establish a safe and secure Compassion Center for our patients. Our security staff will coordinate any traffic related issues and oversee any traffic details which the Town may deem necessary during peak hours, holidays, or other events.

All Staff and each new patient or out of state patient will receive a packet which includes information on respecting the surrounding community. We will ask all patients to respect our neighbors by following appropriate speed limits, to not litter, not play loud music, and abide by our strict drug and alcohol policy. The use of drugs or alcohols including marijuana and derived products is not allowed on the premises.

### **Packaging and Labelling**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is referenced and listed in sections S-W.

### **Complaints**

CCC has created a SOP for complaints. The SOP is referenced and listed in section O.





### **Returns/Refunds**

CCC has created a SOP returns and refunds of medical marijuana products. The SOP is listed referenced and listed in section O.

### **Product Recalls**

CCC has created a SOP for product recalls of medical marijuana products. The SOP is referenced and listed in section M.

### **Applicants Biography**

#### **Executive Team Professional Experience**

Gregory Cooper is the founder and president of Cooper Construction Co. established in 1996 and based in South Kingstown, Rhode Island. He has over 20 years of experience managing both large- and small-scale construction projects, as well as managing his large team of contractors. Mr. Cooper is no stranger to maintaining deadlines, project execution, and attention to detail.

Michael Watkins is the owner of Watkins Painting and has been in business for over 17 years, operating out of Bradford, Rhode Island. He has grown the business from being a single painter to now managing a large-scale crew who work on projects all over Rhode Island. He is no stranger to getting his hands dirty in order to bring a project from start to finish.

Patricia Thornton is a certified yoga instructor and reflexologist operating out of South Kingstown, Rhode Island. She also owns and operates a gardening business. Patricia's green thumb will be assisting with our cultivation operations.

Gary Cardillo is the founder and CEO of TechniArt Inc. Since 1986 TechniArt has melded new technology with creativity, to offer consumers unique experiences that enrich their lives. They offer creative and agile resolutions for efficient products to help utilities, efficiency programs, and implementers reach, engage, educate, and sell to their customers. TechniArt has a physical presence in 6 States and currently provides services to 31 States in total. Mr. Cardillo is a driven leader with proven results in launching and managing all aspects of a new business including strategic planning, finance/ accounting, marketing, human resources, and regulatory compliance.

Adam Tardif is the President of TechniArt Inc., as President Adam oversees the P&L sheet and company's business strategy. He supports the continuous improvement of the company's core services and provides account service to 31 utilities across the country. He has been a part of TechniArt since 1997.

#### **Executive Team Medical Marijuana Experience**



Gregory Cooper is the Managing Member and GM of Cann Cure Cultivation, LLC a Class A licensed medical marijuana cultivator operating out of Warwick, RI. Gregory was a licensed Caregiver as well, before opening Cann Cure Cultivation in 2017. He also completed the University of Rhode Island Master Gardening course in 2001.

Michael Watkins is a Member and the Director of Operations for Cann Cure Cultivation, LLC. He has also been a licensed Caregiver in Rhode Island for the past 12 years. He will be bringing his in-depth knowledge of strain differentiations, growing procedures, and quality control to ensure the success of Cann Cure Compassion Inc.

Patricia Thornton is the Secretary and Member of Cann Cure Cultivation LLC, Gary Cardillo is the CFO and Member of Cann Cure Cultivation LLC, and Adam Tardif is also a Member of Cann Cure Cultivation LLC.

### **Current State Issued Marijuana Caregiver and Cultivator Licenses**

Our team currently has members who are licensed cultivators in Rhode Island. LICENSE NUMBER MMP CV 0072 (CLASS A) involves all members on this application. This license is active and operational.

### **Proposed Medical Marijuana Varieties and Product Types**

Cann Cure Compassion Inc. will assume the Class A cultivator license through the merger with Cann Cure Cultivation LLC, in accordance with R.I. Gen. Laws § 21-28.6-12(b)(10), where all genetics will be preserved and available. We have a genetics bank of over 20 different strains allowing for variety while keeping core items available.

All products will have a range of THC percentages, as we understand the average patient wants relief without unnecessary impairment. We also understand patients will range quite drastically in their needs, while some may require less amounts of THC while others require a larger dose.

Additionally, all products will have a CBD option available as well. Through our cultivation capabilities we will also ensure to offer strains that are primarily CBD, as we understand and support the healing qualities they offer. Cann Cure Compassion Inc. will offer a wide range of Marijuana Infused Products (MIPS) to patients who struggle with inhalation methods.

All products offered will be in accordance with the regulations to include proper dosing. Products below are examples of intended retail items. All will have varying strengths, cannabinoid and terpene percentages, along with CBD options.

- Flower
- Concentrates
- Oils for Aerosolization



## Marijuana Varieties:

- Gorilla Glue
- Mandarin Cookies
- Training Day
- Hulk
- Dirty Mac
- London
- Thank You Jerry
- Cherry
- Wedding Cake
- Crown Royal
- Black Dog
- Sour Apple
- Big Smooth
- Pineapple Express

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### **Hardship, Discounted, Free Medicine, and Charity Care Policy**

Cann Cure Compassion Inc. understands that those hit the hardest through underlying health conditions and financial challenges, will need the most assistance.

Cann Cure Compassion Inc. will offer a minimum 10% discount for all of the following programs following proof of documentation:

- Rite Care
- Food Supplement Benefits (EBT)
- Supplemental Security Home (SSI)
- Medicare
- Social Security Disability Income (SSDI)
- Patients/Customers 65 years or older
- Military Service

In addition, Cann Cure Compassion will offer 15% off for all Veterans in recognition of their service and sacrifice to this country.

Cann Cure Compassion Inc. will provide medical marijuana at a reduced price and even free at times, based on an individual basis, based on hardship, such as those who are terminally ill or with young children who wouldn't be able to afford their medicine otherwise. Cann Cure Compassion Inc. will offer a 'pay it forward' program, whereby patients without financial concerns could contribute to a fund to help offset the costs of the medicine for those with financial difficulties.

Following one year of operations, Cann Cure Compassion Inc. will reassess budgets and possibly be able to assist even more going forward. For now, a conservative first year is critical for longevity.

### **Employees and/or Agent Training on Federal and State Laws and Regulations**

#### **Federal Law**

The federal government regulates drugs through the Controlled Substances Act (CSA) (21 USC § 811). The CSA does not recognize the difference between medical and recreational use of cannabis. The CSA is generally applied to people who possess, cultivate, or distribute large quantities of cannabis. In 2013, the Department of Justice (DOJ) issued eight (8) guidelines to prosecutors about marijuana enforcement under the CSA indicating that prosecuting state legal medical marijuana cases were not a priority. Fortunately, the DBR in Rhode Island (RI) set forth instructions for medical marijuana dispensaries that adhere to these same eight (8) guidelines.

#### **State Law**



The Edward O. Hawkins and Thomas C. Slater Medical Marijuana Act (Rhode Island General Law §21-28.6-2).

The State of Rhode Island recognizes the medicinal value of marijuana in treating or minimizing pain, nausea, and other symptoms associated with certain debilitating medical conditions. Although federal law prohibits any use of marijuana, RI has joined several other states permitting the medical use and cultivation of marijuana to benefit the health and welfare of its citizens. States do not have to enforce federal law or prosecute people who engage in activities in violation of federal law. However, RI state law does make a distinction between the medical and non-medical use of marijuana.

### **Staff Training**

All CCC Staff and Security Officers shall be trained in the difference between Federal and State Law as it pertains to marijuana. The medical marijuana guidelines set by the DOJ, RI State Law, and the DBR shall be discussed during this training.

The training shall be held during the pre-employment training orientation. The training shall be a power point lecture. The President, VP and or the CSO shall conduct the training. Guest speakers may be used. A post training exam shall be administered to evaluate knowledge and understanding of the material presented.

All Staff shall be provided a copy of the federal law as it pertains to marijuana and medical marijuana, the RI Medical Marijuana Act and the DBR regulations for medical marijuana.

The staff at CCC will be trained to follow all required HIPAA compliant protocols. All employees will be required to become HIPAA certified through [HIPAATRaining.COM](http://HIPAATRaining.COM) prior to interacting with patients or having access to sensitive or private information.

Any release of information will need to be verified by the Compliance Officer who will ensure all patient signatures are in place on our authorization form.

All employees will have access to the resources below.

The Human Resources Department will ensure all new employees who will be accessing any patient's private information will not be given a badge nor allowed to work or volunteer without a current HIPAA certification. All certifications will be scanned and saved within each employee or volunteer's file. Human Resources will also ensure that all regulations are followed regarding HIPAA requirements.



#### RESOURCES

HIPAA Privacy Rule

<https://www.hhs.gov/hipaa/for-professionals/privacy/index.html>

HHS OCR Summary of the Privacy Rule

<https://www.hhs.gov/hipaa/for-professionals/privacy/laws-regulations/index.html>

HHS OCR Public Health Authority Guidance

<https://www.hhs.gov/hipaa/for-professionals/special-topics/public-health/index.html>

HHS OCR Guidance on Disclosures in Emergencies

<https://www.hhs.gov/hipaa/for-professionals/faq/960/can-health-care-information-be-shared-in-a-severe-disaster/index.html>

HIPAA Privacy Decision Tool for Emergency Preparedness

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/decision-tool-overview/index.html>

### **Employees and/or Agent Training on Standard Operating Procedures**

Every employee, agent, or volunteer will be given a copy of the Rules and Regulations Related to the Medical Marijuana Program Administered by the Office of Cannabis Regulation at the Department of Business Regulation otherwise known as 230-RICR-80-05-01.

All staff members, agents, and volunteers should be aware that except as provided in § 1.6.4(B)(1)(a) or through the regulated sale of medical marijuana to a qualifying patient, their registered caregiver or authorized purchaser, transfers of marijuana and marijuana product between CCC and its officers, directors, members/managers, and/or employees is strictly prohibited.

Per R.I. Gen. Laws §§ 21-28.6-12(f)(14) and 21-28.6-16(b), CCC will develop, implement and maintain on the premises an on-site training curriculum, or will enter into contractual relationships with outside resources capable of meeting employee, agent and, if applicable, volunteer training needs.

### **Training on Detection and prevention of Diversion of Medical Marijuana**

It is the policy of CCC to prevent, detect, and divert all attempts at the purchasing and distribution of marijuana or marijuana products for someone else and or the illegal sale of marijuana or marijuana products on the premises.

Prevention:

- CCC Security Personnel shall be highly visible outside of the facility and in the parking lot areas of the business to prevent the illegal sale of marijuana and marijuana products to someone else.





- CCC Security Personnel shall not allow anyone to congregate in the parking lot or anywhere else on the premises. Individuals loitering on the property will be politely asked to leave to mitigate the possibility of illegal activity.

#### Detection:

- CCC Security Personnel and all other employees shall be trained in how to detect and address illegal activity inside and outside of the facility.
- It shall be the policy of CCC employees to report any illegal activity or perceived illegal activity to security who will investigate immediately.
- Police shall be called immediately upon the discovery of illegal activity.

#### Training:

- CCC Security Personnel and all other employees shall be trained in how to prevent and detect crime at the facility by attending a documented training orientation on safety and security prior to their first day of work. This training shall include instructions on how to properly respond to key incidents, including but not limited to robbery, burglary, intruders, threats of violence, disorderly subjects, assaults, weapons possession, civil, natural or manmade disasters, proper use of panic, hold-up and burglar alarms, cyber security, proper response when law enforcement or first responders arrive at the facility, and incident reporting.
- A written test shall be administered after the training to verify knowledge of the material presented.
- Training records shall be kept in a secured area and will include the content of the training provided and the names of the employees who attended the training. The records shall be kept for at least 365 day after the training has been provided.
- All CCC employees shall receive an employee manual with all CCC policies and procedures. All employees regardless of your employer being a management company or CCC will be required to adhere to all policies, procedures, and additional requests pre the Human Resources Department at CCC.

### **Receipt of Medical Marijuana Material and/or Products SOP**

Upon arrival at the destination marijuana establishment licensee, CCC will confirm receipt of each item in the presence of the delivering authorized transport cardholder and then initial each received line item on both the originating licensee's manifest and CCC's manifest. CCC will then immediately re-weigh, re-inventory, and account on video for all marijuana and marijuana product transported.

Both the originating and recipient marijuana establishment licensees shall timely adjust their records to reflect in its records the completed authorized transport of marijuana, including logging such information in the Medical Marijuana Program Tracking System. All records and



entries in the Medical Marijuana Program Tracking System shall be easily reconciled by unique identifier, product name and quantity, with the applicable detailed transport manifest.

### **Use of a Perpetual Inventory Control System**

CCC will utilize BioTrack THC, a state approved Medical Marijuana Program Tracking System, for all inventory tracking from “seed to sale” as defined in DBR Regulation § 1.6.1.

All information related to the acquisition, propagation, cultivation, transfer, manufacturing, processing, testing, storage, destruction, wholesale and/or retail sale of all marijuana and medical marijuana products possessed by CCC will be kept completely up to date in the “Seed to Sale” Medical Marijuana Program Tracking System, including but not limited to:

- Planting and propagation of plants
- Transition of immature to mature plants
- Harvest dates with yield documentation
- Destructions of immature plants, mature plants and medical marijuana products
- Transportation of immature plants, mature plants, and medical marijuana products
- Theft of immature plants, mature plants, and medical marijuana products
- Adjustment of product quantities and/or weights
- Conversion of product types including waste documentation
- Required test results as reported by a cannabis testing laboratory
- Retail and wholesale transaction data
- Product compliance data

A complete inventory, but not limited to:

- Batches or lots of useable marijuana
- Batches or lots of concentrates
- Batches or lots of extracts
- Batches or lots of marijuana infused products
- Immature plants
- Mature plants
- Marijuana waste

If CCC is notified by DBR that the BioTrackTHC Medical Marijuana Program Tracking System is no longer available, CCC will, while waiting further direction as to alternative inventory control measures approved by DBR, may initiate the following and be directed to:

- Conduct an initial physical comprehensive inventory of all medical marijuana, including usable marijuana available for dispensing and/or sale, marijuana plants and seedlings, unusable marijuana, and wet marijuana, at each authorized location on the date CCC first dispenses, or first cultivates medical marijuana or as of another date certain set by DBR.



- Conduct daily subsequent comprehensive inventories
- Conduct extensive regular, but not less than monthly, inventory review of stored, usable marijuana, seedlings, plants, and wet marijuana.

CCC is aware that upon request by the Department, CCC shall conduct and provide the results of alternative inventory control measures outlined above, regardless of the availability and use of the “Seed to Sale” Medical Marijuana Program Tracking System.

All inventories will be tracked using RFID or other approved tracking tags, clear concise labeling, and recorded in our state approved “Seed to Sale” medical marijuana tracking system.

All employees of CCC, will, prior to actually being able to interact with any inventory items, undertake their initial training of CCC’s practices and procedures, which will cover the “Chain of Custody” of all inventory. Every employee will be responsible for ensuring CCC’s inventory is regularly complying with our Inventory Controls and that all records are kept up to date. Managers will regularly, but not less than daily, ensure that all Inventory is duly accounted for.

### **Medical Marijuana Program Tracking System**

In the event access to our approved medical marijuana tracking system has been interrupted, or the medical marijuana tracking system is not working properly, CCC will, take the following measures prior to further dispensing or sale of medical marijuana to license patients, their caregivers or authorized purchasers, for each medical marijuana unit or product:

- Create a unique identifier
- Enter information regarding the product/unit into an alternate inventory control system.
- Create a label with the unique identifier and batch number.
- Securely attach the label to each unit/product.

This process will be done manually, all pre-logged information regarding the above will be referenced from the external back up database, which is independent of the Seed to Sale software.

### **Inventory or Supply Discrepancy Reporting to DBR**

In the event of any discrepancy in the inventory levels, or any other discrepancies with regards to supplies, the notifying employee will inform the Managers of CCC. In turn, CCC will promptly notify the Department of Business Regulation. CCC will also institute an internal investigation as to the reasons for the noticed discrepancy between actual levels and those reported in the “Seed to Sale” medical marijuana program tracking system. CCC will also report the findings to DBR upon discovery of the results of the internal investigations. Depending on the level of the



discrepancy, either DBR or CCC will also provide the results of the investigations to inform the necessary authorities (i.e., local and State Police, if the reason is due to theft, or to RIDEM if the discrepancy is due to spillage of supplies) for further necessary actions.

### **Quarantining of Product that fails to meet required criteria**

CCC will have procedures to deal with recalls due to any action initiated at the request or order of DBR, and any voluntary action by CCC to remove defective or potentially defective medical marijuana or medical marijuana delivery devices from the market, as well as any action undertaken to promote public health and safety. We will have a Voluntary or Mandatory Product Recall Form.

CCC will have policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is quarantined from other marijuana and destroyed.

All marijuana products will undergo and comply with all required testing as stated in the DOH Testing Regulations in order to be designated as medical and be offered for sale by CCC. Until the product is designated as medical or upon a recall of a medical product, all marijuana and marijuana products will be quarantined in accordance with § 1.11.

CCC will have policies and procedures for ensuring that any outdated, damaged, deteriorated, mislabeled, or contaminated marijuana is quarantined from other marijuana and destroyed.

Products will be tracked by the stages they travel through. For example, when inventory enters our facilities quarantine area all products will be broken down to their exterior surface and wiped clean with an approved disinfectant per the DBR regulations. Packages will be monitored for insects, mold, atypical odors or discolorations.

Any product identified as concerning should fill out a QC Concern Form and deliver it to the compliance officer.

Products will be separated accordingly:

#### **Products that have yet to be sampled for testing:**

Prior to required testing samples being taken from a batch of marijuana plant material and/or a batch of processed concentrate or extract, CCC will store the batch in one or more sealed containers enclosed on all sides, in order to:

- Prevent the product from being tampered with, transferred, or sold prior to sampling and compliant test results being reported.
- Be able to be easily located.

Each container in which plant material and/or a batch of processed concentrate or extract is stored must be affixed with a label that includes the following information:



- The CCC name and license number when products are affiliated with our cultivation facility. Otherwise, all products will arrive packaged, tested, and designated as medical.
- All products will have a unique identifier generated by the Medical Marijuana Program Tracking System.
- Strain name or product name (waste excluded)
- The quantity of the product
- In bold, capital letters, no smaller than 12-point font, “PRODUCT NOT SAMPLED FOR TESTING.”

### **Product that is awaiting/pending test results:**

Please note that current protocols require vendors to have all manifests with corresponding test results sent for verification prior to the acceptance and confirmation of a delivery time. The protocols below will be followed as well.

After required testing samples have been taken from a batch of marijuana plant material and/or a batch of processed concentrate or extract, CCC must store the batch in one or more sealed containers enclosed on all sides, in order to:

- Prevent the product from being tampered with, or transferred, or sold prior to compliant test results being reported.
- Be able to be easily located

Each container in which the marijuana product is stored must be affixed with a label that includes the following information:

- The CCC name and license number
- The batch number generated by the Medical Marijuana Program Tracking System
- Name and registry identification card number of the person who took the samples
- Name and license number of the testing facility that will perform the tests
- The test sample(s) unique identification number
- The quantity of the product
- The date the samples were taken
- In bold, capital letters, no smaller than 12-point font, “PRODUCT NOT TESTED.”

### **Failed Test Batches**

If a CCC sample’s result exceeds an action level in [216-RICR-60-05-6](#) or as otherwise adopted by DOH, the testing facility must report to DBR and to CCC that the sample failed the test for which the result exceeds the action level.

If so desired, CCC reserves the right to request in writing for permission from DBR to have the lab retest the sample.



If the sample is approved by DBR for a retest, the laboratory must follow the retesting guidelines outlined in § 1.11(E).

If a retest is not granted, if the sample failed the retest, or if the batch is not approved for remediation, the batch that the sample was taken from will be immediately destroyed by CCC.

The destruction of the failed test batch will be logged in the Medical Marijuana Program Tracking System.

### **Retesting**

In the event of a retest, the following protocol will be followed:

- If there is enough remaining material from the initial sample to retest, the testing facility will use that sample material.
- If there is not enough material from the initial sample, the laboratory sample collector will collect another sample from the same batch using the same collection process.
- If the sample passes the retest, the sample will be deemed to have passed that test and the passing results will apply.

Within two (2) business days from issuance of final test results, the lab must upload results into the Medical Marijuana Program Tracking System if this system is currently in operation or submit the certificate of analysis to DBR as directed by DBR.

### **Remediation**

In the event a testing facility determines that a sample has failed testing, CCC can request from DBR in writing an opportunity to remediate the batch before requesting the batch be re-tested.

CCC must demonstrate to DBR that the issues identified by the testing facility are of the kind that can be remediated.

CCC will always consider the public health and safety consequences of remediation.

Any testing of a remediated batch must be conducted by the same testing facility that originally determined that the sample failed testing.

No remediated harvest, lots or batches may be sold or transported until the completion and successful passage of quality assurance testing as required in [216-RICR-60-05-6](#) or as otherwise adopted by DOH.

CCC will not allow products into the facility until test results have been scanned and emailed to Quality Control. Products without results will be turned away reducing the need to quarantine.

### **Notification and Recall of Faulty Products**



Our cultivation facility is aware that the DBR or DOH may require CCC to recall any marijuana or marijuana product that the licensee, whether it be our cultivation facility or an outside vendor, has sold or transferred upon a finding that circumstances exist that pose a risk to public health, safety and welfare.

- The recall will be initiated by CCC immediately as determined by the CCC recall plan. This could be by a vendor or CCC.
- CCC will always comply with any additional instructions made by DBR

CCC employees are aware that a recall may be based on, without limitation, evidence that the marijuana, marijuana product, or medical marijuana product:

- Contains unauthorized pesticide(s).
- Failed a mandatory test and was not mitigated pursuant to testing protocols
- Is contaminated or otherwise unfit for human use, consumption or application
- Is not properly packaged or labeled
- Was not cultivated, processed or manufactured by a licensee or otherwise is not in accordance with the Act, DBR regulations or DOH regulations.
- Otherwise poses a threat to public health or safety as determined by DBR or DOH.

CCC is aware that the DBR may at any time require the destruction of a medical marijuana product or marijuana product upon a finding that circumstances exist that pose a risk to public safety and health.

If DBR finds that a recall is required, DBR:

- Must notify the public and CCC of the recall.
- Must affect an administrative hold on all affected medical marijuana and/or medical marijuana products in the tracking system.
- May require CCC to place all marijuana, marijuana product, medical marijuana and medical marijuana product in quarantine itself or with a third-party custodian at the licensee's expense.
- May require CCC to notify all individuals to whom such medical marijuana or a medical marijuana product was sold.
- May require CCC to destroy the recalled product

### **Medical Marijuana and Medical Marijuana Products Secure Storage**

CCC proposes the following product storage concept following DBR for approval.

CCC will utilize a state of art temperature and humidity-controlled environment for the storage of the medical marijuana products to best preserve the quality and condition of the medical marijuana for a prolonged duration of time. Access to storage area will be strictly controlled with





limited access controls where select personnel will have access per Human Resources and Security. Our professional security technicians will install the appropriate technology and data proven techniques to meet regulations and control access to the storage area.

Equipment within the storage area will meet all food grade standards and will be organized using tags and labels to effectively integrate the BioTrackTHC Seed to Sale Medical Marijuana Tracking System.

If additional storage area is needed, CCC has additional plans to convert office space into additional storage area and adding additional humidity and temperature control systems with all appropriate security measures in place.

### **Response to Patients Complaints and Adverse Events**

CCC will institute appropriate policies and procedures for handling voluntary and mandatory recalls of marijuana. Such procedures shall include adequate measures to address recalls due to any action initiated at the request or order of the DBR, and any voluntary action by CCC, or licensed cultivator to remove harmful, or potentially harmful medical marijuana, or medical marijuana delivery devices from the market. CCC will also take all necessary actions to promote public health and safety.

CCC will assess each request for a refund on a case-by-case basis. A CCC manager will meet with the patient, or their caregiver, or authorized purchaser to submit a Complaint/Refund Request Form, which must be signed by the returning patient, caregiver or authorized purchaser. The Refund Request form must be submitted to the Compliance Officer or Quality Control Manager. The Manager will also assess the matter for the possibility of a defective product vs. a disappointed customer. All defective products will be replaced at no cost to the customer. The most common example of a defect will be the battery on a vape pen. If the request discovers that there is a potential for a health care risk, CCC's Vice President needs to be notified for a thorough review. Any product that is returned to CCC will be immediately quarantined and likely destroyed and disposed of in accordance with regulations.

Patients will also likely voice their displeasure when a product does not meet their expectations. The complaint will be reviewed in detail to determine if the product was not stored well, making it either too dry or moist for best efficacy. Depending on the situation, a refund or replacement will be determined. Patients will also be given the opportunity to sit down with a consultant for a "Cannabis 101" review to include a question-and-answer session. Depending on the patient's willingness to participate, staff will likely be encouraged to approve the refund request, as the customer has identified a positive attitude to learn more about which strain and/or methodology is best suited for the patient.

Any defective product costs will be returned in a method as purchased or approved by the DBR. The Compliance Officer will assess the area of concern and document the resolution. The Vice





President will review complaints and resolutions every 2 weeks. Any SOP changes will be noted within the logbook and made available to staff for further training and to DBR for sharing of information.

### **Transportation and Receipt of Medical Marijuana within Rhode Island Only**

CCC is aware and will follow all requirements that only licensed cultivators shall sell to and receive medical marijuana and marijuana products from Rhode Island licensed compassion centers and other Rhode Island licensed cultivators per R.I. Gen. Laws 21-28.6-16(a).

As part of such approved sales transactions, the licensed cultivator may transfer and transport medical marijuana and medical marijuana products to CCC or licensed cultivator in per DBR Regulation § 1.6.8.

A licensed cultivator may only receive medical marijuana and marijuana products from CCC if the receipt is pursuant to a written contract or purchase order for the licensed cultivator to process the medical marijuana into a product to be furnished back to CCC per the direction of R.I. Gen. Laws § 21-28.6-16(e).

Pursuant to R.I. Gen. Laws § 21-28.6-16(e), CCC will only purchase or otherwise receive marijuana from a Rhode Island licensed cultivator, with which it has a “formal agreement” that contains the following information:

- Date of execution/placement of the contract/purchase order.
- Description and amount of product to be sold and/or services to be provided.
- The total price and per unit price of the product to be sold and/or services to be provided.
- The specific date or date range not spanning more than thirty (30) calendar days for fulfillment of the order, performance of the services, and delivery or pickup.
- The payment due date, as specifically agreed between the parties, but if no date is specifically agreed to, payment shall be made within thirty (30) calendar days of delivery or pickup.
- Contracts/purchase orders pursuant to this paragraph may not be modified but may be cancelled or voided by the creation of a new replacement contract/purchase order. CCC will not transfer medical marijuana or medical marijuana products to another compassion center pursuant to R.I. Gen. Laws § 21-28.6-12(d)(5)(v).

### **Permitted Sales to Patients and Non-Residents**

CCC sales to qualifying patients, directly or through their caregivers or authorized purchasers, are only permitted if those qualifying patients, caregivers, or authorized purchasers are registered and compliant with the Act and all regulations promulgated thereunder. Only marijuana products that have been designated as medical marijuana in accordance with § 1.7 may be sold or distributed. CCC will strictly follow all dispensing limits of R.I. Gen. Laws § 21-28.6-12(g).



For any sales of medical marijuana to patients that are not residents of Rhode Island, CCC will strictly follow the guidelines provided by R.I. Gen. Laws § 21-28.6-4(o). This requires that the receiving or purchasing patient has a valid medical marijuana card, or the equivalent, which has been issued by the applicable regulating authority for the medical marijuana program of the issuing U.S. state/jurisdiction/territory. The patient must also possess, and present valid government issued identification matching the name on the issued medical marijuana card. CCC will keep an up-to-date list and have examples of other state's medical marijuana issued licenses and, when available, check appropriate databases.

Each verified patient shall complete an initial Intake Form, which includes at minimum the home state card registration number or if the home state registration number is not available, a unique identifier assigned by CCC.

CCC will log and track all transactions with each out-of-state patient cardholder in the Medical Marijuana Program Tracking System according to the issuing state's patient card registration number or the unique identifier assigned to that person by CCC.

Such Intake Form shall also include a notice regarding the requirements and prohibitions under the Act and any regulations promulgated thereunder that apply to dispensing and use of medical marijuana within the State of Rhode Island, including without limitation notice of medical marijuana dispensing and possession limits, prohibition of taking medical marijuana and medical marijuana products across state lines and prohibition of smoking in public places.

CCC will confidentially maintain the out-of-state patient information in accordance with § 1.6.6(D)(2).

Should CCC employ a delivery service for sale to qualifying patient cardholder's residences, it shall be done in strict compliance with Department Regulation § 1.6.9 and as outlined in CCC's SOP for Home Delivery.

Any transfer to or from a third-party testing provider shall be in accordance with Department Regulation §1.11 and §1.6.8.

### **Prohibited Sales and Transactions**

CCC understands that there are certain prohibited transactions pursuant to R.I. Gen. Laws §§ 21-28.6-4(c) and (j). These prohibitions include that CCC will not purchase or otherwise receive marijuana from any qualifying patient cardholder or primary caregiver. This prohibition extends to purchases and transfers from cooperative cultivations.

### **Transportation of Medical Marijuana Products**

CCC Does not intend to commence operations with a delivery service. All related SOPs and supportive policies will be considered as a draft document for future considerations / applications.

Authorized Transport Vehicle Requirements:



- Authorized transports will be conducted in such a manner as to ensure that marijuana and marijuana products are always secured and safe during transport.
- CCC will use a vehicle meeting all the following criteria:
  - The vehicle will bear no markings that indicate that the vehicle is being used to transport marijuana nor indicates CCC.
  - The vehicle will be equipped with a global positioning system monitoring device that is monitored by CCC during an authorized transport.
  - The vehicle will be equipped with an alarm system
  - The vehicle will be equipped with functioning heating and air conditioning systems appropriate for maintaining correct temperatures for the storage of marijuana products.
  - Marijuana products must not be visible from outside the vehicle.
  - Marijuana products must be stored and transported in a secure, locked storage compartment that is a part of the vehicle transporting the marijuana products where the trunk of a vehicle does not qualify as a “locked storage compartment.”
- When transporting marijuana products, no other products will be transported or stored in the same vehicle.
- No firearms will be located within the vehicle or on the person of the authorized transport cardholder.

#### Detailed Transport Manifests 1.6.8:

- CCC will create and maintain detailed transport manifests for all authorized transports, which will be generated through and / or maintained in our Medical Marijuana Program Tracking System.
- The detailed transport manifest shall be prepared by CCC and transmitted in advance to the receiving license. Both licensees shall retain copies of detailed transport manifests as part of their record retention responsibilities.
- The detailed transport manifest will include the following minimum information:
  - Departure date and approximate time of departure.
  - Names, location addresses, and registration/license numbers of the originating and receiving marijuana establishment facilities.
  - Unique identifier generated by the Medical Marijuana Program Tracking System.
  - If for transport to a registered qualifying patient pursuant to an approved patient home delivery plan per 1.6.9, the patient registry identification card number and any such other information pursuant to approved delivery plan.
  - Product names or descriptions
  - Quantities (by weight or unit) of each product to be delivered.
  - Product name or descriptions and quantities (by weight or unit) of each product which was received by the marijuana establishment licensee.
  - Arrival date and approximate time of arrival
  - Delivery vehicles make, model, and license plate number



- Names, registry identification card numbers, and signatures of the authorized transport cardholders.

#### Authorized Transportation Requirements:

- CCC will ensure that all delivery times and routes are randomized.
- CCC will ensure that all transport routes remain within the State of Rhode Island
- Authorized transports may only be made by authorized transport cardholders affiliated with CCC that is the source or recipient party to an authorized transaction.
- If using one authorized transport vehicle, the vehicle shall be operated/occupied by a minimum of two authorized transport cardholders and at least one such cardholder shall always remain in the authorized transport vehicle until the vehicle returns to CCC.
- If using two authorized transport vehicles, the authorized transport vehicles shall always travel together during the authorized transport and each vehicle shall be operated / occupied by at least one authorized transport cardholder. These vehicles shall not be left unattended for any period during any authorized transportation.

#### During all authorized transports:

- The authorized transport cardholders must have on their persons their CCC registry identification cards and the detailed transport manifest.
- A copy of the detailed transport manifest shall also accompany the marijuana and marijuana products in the locked storage compartment of the authorized transport vehicle.

Any authorized transport vehicle carrying marijuana and marijuana products shall travel directly from CCC to the receiving marijuana establishment licensee or vice versa.

In case of an emergency stop, a detailed written account must be maintained describing the reason for the event, the duration, the location, any activities occurring during the stop, and any personnel exiting the vehicle during the stop.

Prior to leaving CCC for an authorized transport to another marijuana establishment licensee, CCC must weigh, inventory, and account for all marijuana and marijuana product to be transported on video.

For authorized transports to and from CCC, the transport manifest shall be accompanied by a copy of any contract / purchase order for which the transport is being made and documentation of the actual payment date, if prepaid.

Upon arrival at the destination marijuana establishment licensee, CCC will confirm receipt of each item in the presence of the delivering authorized transport cardholder and then initial each received line item on both the originating licensee's manifest and CCC's manifest. CCC will then immediately re-weigh, re-inventory, and account on video for all marijuana and marijuana product transported.



Both the originating and recipient marijuana establishment licensees shall timely adjust their records to reflect in its records the completed authorized transport of marijuana, including logging such information in the Medical Marijuana Program Tracking System. All records and entries in the Medical Marijuana Program Tracking System shall be easily reconciled by unique identifier, product name and quantity, with the applicable detailed transport manifest.

Any unusual discrepancies in the quantity described in the detailed transport manifest and the quantities received shall be reported to DBR and municipal and/or state law enforcement within twenty-four (24) hours.

Any vehicle accidents, diversions, or losses during authorized transports of marijuana shall be reported to DBR and law enforcement as an “emergency event” pursuant to § 1.6.5(I).

Transportation to or from a third-party testing provider shall be in accordance with the DOH Testing Regulations.

### **Procedures to Report Personal Health Conditions**

CCC will enforce all health care related SOPs in order to better protect our patients and employees. It is everyone's responsibility to acknowledge the face behind the mask could be fighting cancer or be immunocompromised and that healthcare is everyone's responsibility.

Every employee, owner, volunteer or participant of CCC will be required to review and sign off on not only the Employee / Volunteer Training Manual and the Compliance Manuals but more specifically acknowledgement that all agree to follow the Personal Health Conditions Report Form. Everyone should maintain compliance by reporting symptoms and diagnosed illnesses while understanding what is required in order to return to work.

Any additional it is your responsibility to report any healthcare conditions that could pose a threat to customers or compromise the cleanliness or quality of the medical marijuana products the employee/agent might handle to your direct manager or Compliance Officer.

### **Patient Health Conditions (HIPPA)**

A patient's health condition is a very private matter and protected by law. All employees and staff members that will have direct contact with confidential patient information will complete basic HIPAA training. This training will help employees understand HIPAA privacy rules and procedures. Visit the website: <http://www.hipaatraining.com/> to begin to familiarize employees with HIPAA policies.

Upon acceptance of new patient records, provide a verbal disclosure statement to the patient. This verbal statement should make the patient aware that their records are being kept per State law and that they will be maintained in such a way that their information will remain confidential and kept from public view or oversight.



Access to confidential patient records will be limited to employees with the proper clearance level. These records will be accessible only by ownership, management and patient advocates. Limiting employee access to confidential patient records will help reduce the risk to exposure. Additional employees may be granted the proper clearance level to access confidential patient records as needed in the future.

Keep all patient records in a secure locking file cabinet or lockable filing system within a limited or restricted access area of the premises. Having all confidential patient files centrally located in can help ensure that no confidential patient records are being kept in exposed areas where it is possible for an information breach.

When patient records are initially gathered, be sure to create a new patient folder and place the patient records within said folder. All folders should be marked confidential and place in a secured and lockable file cabinet within a limited or restricted access area of the facility (i.e., the facility manager's office).

All employees will receive training to never disclose the specific names of patients with non-employees or parties outside the organization. It is important that the names of patients not be shared with the public in anyway, as this would result in a HIPAA violation.

Never leave patient records unattended or unsecure within the file cabinet.

The facility will host a monthly or bi-monthly meeting with all employees to go over privacy and confidentiality policies, procedures and measures. This will provide further accountability on all staff levels to make sure privacy/legal compliance

### **Disposal of outdated, damaged, deteriorated medical marijuana**

CCC will adopt practice methodologies from Cann Cure Cultivation LLC, who have already been approved by the DBR. In addition, CCC will ensure that:

- Marijuana and marijuana product waste (including all liquid, chemical, hazardous, pesticide, manufacturing solvent and chemical waste containing any traces of marijuana) must be stored, secured, and managed in accordance with all applicable federal, state, and local statutes, regulations, ordinances, or other legal requirements.
- Prior to disposal, marijuana and marijuana product waste must be made unusable and any marijuana plant material made indistinguishable from other plant material. This may be accomplished by grinding and incorporating the marijuana plant waste with other non-consumable solid waste or other ground materials, so the resulting mixture is at least fifty percent non-marijuana waste by volume.
- Compostable Mixed Waste: Cannabis waste to be disposed as compost feedstock or in another organic waste method (for example, anaerobic digester) may be mixed with the following types of waste materials:
  - Food waste





- Yard waste
  - Vegetable based grease or oils
  - Other wastes as approved by the Department of Health (i.e., agricultural material, biodegradable products and paper, clean wood, fruits and vegetable plant matter).
- Non-compostable Mixed Waste: Cannabis waste to be disposed in a landfill or by another disposal method may be mixed with the following types of waste materials:
  - Paper waste
  - Cardboard waste
  - Plastic waste
  - Soil
  - Other wastes as approved by the Division (i.e., non-recyclable plastic, broken glass, leather, etc.)
- Other methods to render marijuana waste unusable must be approved by DBR before implementing. Marijuana waste rendered unusable following an approved method may be disposed of in a licensed solid waste disposal facility in Rhode Island or disposed of in an alternative manner approved by DBR.
- Destruction of marijuana and marijuana materials upon revocation or abandonment of CCC shall be specifically governed by DBR order or agreement and/or coordinated efforts with law enforcement.

CCC will maintain accurate and comprehensive records regarding waste material that accounts for, reconciles, and evidences all waste activity related to the disposal of marijuana and marijuana products (including any waste material produced through the trimming or pruning of a marijuana plant prior to harvest). DBR may mandate storage of any such records or summaries of such records to be through the Medical Marijuana Program Tracking System or any other electronic system DBR designates.

CCC will comply with all actions per § 1.6.16 along with any applicable State laws, regulations or policies.

### **Packaging and labeling of Medical Marijuana**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is listed below.

### **Allergy Warning Labels on Medical Marijuana Packaging**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is listed below.

### **Packaging does not resemble any commercially available product**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is listed below.



### **Packaging does not resemble anything other than packaged Medical Marijuana**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is listed below.

### **Package will not feature any graphics that may be appealing to children**

CCC has created a SOP for packaging and labeling all medical marijuana products. The SOP is listed below.

### **Labeling, Packaging, Prohibitions and Warnings SOP**

Retail-ready medical marijuana products will be placed in completely compliant packaging upon entering CCC's retail sale space.

All packaging will comply with the directives of the Office of Cannabis Regulations within the Rhode Island Department of Business Regulation, as promulgated by the "Packaging and Labeling Guide for Medical Marijuana, dated March 1, 2020", and as those regulations are amended, so will CCC's packaging requirements.

Following are the standards that CCC will follow in order to comply with the controlling Regulations and Ordinances:

For dried marijuana "flower", CCC will make sure that the packaging is:

- Opaque
- Light-Resistant
- Tamper-Evident
- Neutral in Color
- Certified as Child-Resistant (see below for additional requirements)
- Resealable
- Protects the product from contamination
- Does not impart any toxic or deleterious substance to the product
- Fully encloses the product
- Does not contain any design, image, label, or coloring that was not approved or required by the OCR

For labeling of Flower, CCC will make sure that the following requirements are met:

- Font size will be larger than size 6 font.
- Font type will be one of the approved fonts: Times New Roman, Calibri, Arial, Helvetica.
- Lettering will be printed in either Black or White.
- Clearly printed in the English language.
- The business(es) tradename(s) and license number(s) of the licensee(s) who produced the product.





- The business or tradename and license number of the compassion center selling the product.
- Unique identifier
- Total THC contained in the product.
- Total CBD contained in the product.
- Total Weight of the product, which shall not exceed 2.5 ounces.
- Shall list the contact number for Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222).

CCC will also include, either on the label or as an insert, a complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product and the date of the harvest batch.

CCC's required warnings shall also adhere to the following requirements:

- No smaller than size 8 font
- Bolded
- Black font
- In a bright yellow box
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.

And shall include the following:

- "Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children."
- "Warning: It is unlawful to transport this product outside of Rhode Island."
- "Warning: For medical use by a registered patient only. Not for resale."
- "Warning: Smoking and Vaping is hazardous to your health."

In addition, CCC will include the OCR's designed logo, which shall be prominently displayed and larger or equal to 1" by 1" in size.

For CCC's packaging of concentrated medical marijuana, a/k/a "Concentrates", the packaging of the medical marijuana and the delivery device will comply with the following requirements:

- Opaque
- Light-Resistant
- Tamper-Evident
- Neutral in Color
- Certified as Child-Resistant (see below for additional requirements)
- Resealable
- Protects the product from contamination
- Does not impart any toxic or deleterious substance to the product



- Fully encloses the product
- Does not contain any design, image, label, or coloring that was not approved or required by the OCR

The cartridge and the device will have a consumer testing certificate that shows it is safe for its intended use and will have internal or external temperature controls to prevent combustion and give the consumer the option to change the power output on the device. Some vaporizers that have this feature usually have a power selection on the display or have buttons or other controls that provide the consumer the ability to accurately adjust the temperature upward and downward. Other devices that do not have such controls will be considered compliant if the temperature range is between 315 to 450 degrees Fahrenheit and contain a heating element made of inert material.

For labeling of Concentrates, CCC will make the following requirements are met:

- Font size will be larger in size than 6 Font.
- Fonts will be one of the following Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Lettering will be either Black or White.
- Clearly printed in the English language.
- The business(es) tradename(s) and license number(s) of the licensee(s) who produced the product.
- The business or tradename and license number of the compassion center selling the product.
- Unique identifier.
- Total THC contained in the product, which will not exceed 500 mg
- Total CBD contained in the product.
- Weight of the product.
- Shall list the contact number for Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222).

CCC will also include, either on the label or as an insert, a complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the processing technique or solvent(s) used to produce the product, or that were added to product and the date on which the manufacturing batch was created.

CCC's required warnings shall also adhere to the following requirements:

- No smaller than size 8 font
- Bolded
- Black font
- In a bright yellow box
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.



- Clearly printed in the English language.
- And shall contain the following Warnings:
- “Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”
- “Warning: It is unlawful to transport this product outside of Rhode Island.”
- “Warning: For medical use by a registered patient only. Not for resale.”
- "Warning: Smoking and Vaping is hazardous to your health.”

The OCR’s Universal Symbol will also be printed on the package and on the device, which shall be prominently displayed on the package and the device and shall be larger or equal to 1 inch by 1 inch on the package and clear and conspicuous on the device.

For CCC’s packaging of medical marijuana, that are meant to be orally consumed as a single serving in a solid form, so called “solid, single serving unit”, the packaging of the solid, single serving unit will comply with the following requirements and the packaging will be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable is recommended but not required
- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.
- A single serving unit cannot exceed **10 mg** of THC.

For CCC’s packaging of medical marijuana, that are meant to be orally consumed, as a single serving in a solid form, but sold in multiples within a package, so called “solid, multiple single serving units”, the packaging of the solid, multiple single serving units will comply with the following requirements and the packaging will be:

- Opaque
- Light-Resistant
- Tamper- Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable
- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.



- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.
- A single serving unit cannot exceed **10 mg** of THC
- A package of multiple single serving units cannot exceed **100 mg** of THC

For CCC's packaging of medical marijuana, that are meant to be orally consumed as a single serving in a liquid form, so called "liquid, single serving unit", the packaging of the liquid, single serving unit will comply with the following requirements and the packaging will be:

- Opaque
- Light-Resistant
- Tamper-Evident
- Neutral in Color
- Certified as Child-Resistant
- May be sealed by a metal crown, cork style, or bottle cap type closure
- Resealable is recommended but not required
- Protects the product from contamination
- Does not impart any toxic or deleterious substance to the product
- Fully encloses the product
- Does not contain any design, image, label, or coloring that was not approved or required by the OCR
- A single serving unit cannot exceed **10 mg** of THC

For CCC's packaging of medical marijuana, that are meant to be orally consumed as a single serving in a liquid form but sold in multiple volumes, so called "liquid, multiple single serving units", the packaging of the liquid, multiple serving units will comply with the following requirements and the packaging will be:

- Opaque
- Light-Resistant
- Tamper-Evident
- Neutral in Color
- Certified as Child-Resistant
- Resealable
- Protects the product from contamination.
- Does not impart any toxic or deleterious substance to the product.
- Fully encloses the product.
- Does not contain any design, image, label or coloring that was not approved or required by the OCR.
- Each single serving unit cannot exceed **10 mg** of THC
- The total THC per package must not exceed **100 mg**



- The package must contain a measuring device such as a measuring cap or cup. o Hash marks on the package do not qualify as a measuring device.

A bundled package may contain up to the allowable amount of single serving units a patient/caregiver/authorized purchaser can purchase, which shall be controlled by section 1.14 of the regulations.

For CCC's packaging of medical marijuana, that are meant to be orally consumed as an "Edible", will comply with the following requirements and the packaging will be:

- Font size will be larger than size 6 font
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica
- Must be in Black or White
- Clearly printed in the English language
- The business(es) tradename(s) and license number(s) of the licensee(s) who produced the product
- The business or tradename and license number of the compassion center selling the product
- Unique identifier
- Total THC and CBD (Must be in font larger than size 6, **bolded**, underlined and in red).
- Per Single Serving Unit - Cannot Exceed **10 mg** of THC.
- Per Package - Cannot Exceed **100 mg** of THC.
- Serving Size
- The number of servings per package
- "Use By" Date or Expiration Date
- Poison Control Contact Information (American Association of Poison Control Center (800) 222-1222)
- A complete list of all nonorganic pesticides, herbicides, and fertilizers that were used in the cultivation and production of the medical marijuana product.
- Net weight of the product prior to its placement in the package.
- A list of all ingredients used to manufacture the marijuana infused product, including identification of any major allergens contained in the product in accordance with the Food Allergen Labeling and Consumer Protection Act of 2004, 21 U.S.C. § 343 (2010), specifically milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat and soybeans.
- A nutritional fact panel in accordance with 21 C.F.R. Part 101.
- For **medical marijuana topicals**, a list of all ingredients in descending order of predominance by weight or volume as applicable.
- For **medical marijuana topicals**, the amount recommended for use at any one time
- The date on which the manufacturing batch was created.
- If applicable, the processing technique or solvent(s) used to produce the product.
- If applicable, a list of all chemicals, diluents, additives, ingredients and/or excipients used to produce the product or that were added to product.



CCC will require that all required warnings will adhere to the following font requirements:

- No smaller than size 8 font
- **Bolded**
- Black font
- In a bright yellow box
- Permitted Font Types: Times New Roman, Calibri, Arial, Helvetica.
- Clearly printed in the English language.
- “Warning: For Medical use ONLY. This product contains marijuana. Store in a securely locked cabinet away from children.”
- “Warning: It is unlawful to transport this product outside of Rhode Island.”
- “Warning: For medical use by a registered patient only. Not for resale.”
- Slightly larger font, bolded with priority placement - “Effects of this product may be delayed by 3 or more hours.”
- If applicable, “For Topical Application – Do Not Eat or Smoke.”

The OCR’s Universal Symbol will also be printed on the package and on the device, which shall be prominently displayed on the package and the device and shall be larger or equal to 1 inch by 1 inch on the package and clear and conspicuous on the device.

CCC understands that for a package to be considered child-resistant, the package must be tested and certified as meeting the federal standards set out in 16 CFR 1700 by a qualified, third-party testing firm and will follow the testing procedure found in 16 CFR 1700.20 (link below).

- <https://www.govinfo.gov/content/pkg/CFR-2012-title16-vol2/pdf/CFR-2012-title16-vol2-sec1700-20.pdf>

CCC will provide proper Exit Packaging to accompany all retail sales of medical marijuana, despite the form of the product being taken off CCC’s facility. CCC’s Exit Packaging shall strictly adhere to the following rules and requirements:

- Only medical Marijuana **Flower** and **Concentrates** can be placed into a child-resistant exit package to remain compliant with the child-resistant requirement.
- The Exit Package is not required to be labeled.
- The Exit Package must be opaque, of a neutral color and child resistant.
- The package(s) within the Exit Package containing the retail-ready medical marijuana product must comply with all labeling requirements

CCC understands that the “Stamped Universal Symbol” shall be required on each single serving unit of a medical marijuana infused product with the OCR-selected universal symbol.

The symbol shall be placed directly on at least one side of the medical marijuana infused product and the stamp must be in a manner to cause the universal symbol to be distinguishable and easily recognizable. The universal symbol shall be centered either horizontally or vertically on each



standardized serving of marijuana; and if only imprinted on one-side, the imprinted side must be the front or most predominantly displayed area of medical marijuana infused product; and the size and width of the universal symbol shall be of a size that is at least twenty-five percent (25%) of the serving's height or width, depending on if the symbol is placed horizontally or vertically, but not less than ¼ inch by ¼ inch.

The following medical marijuana infused products must be stamped with the universal symbol:

- Chocolate
- Soft Confections
- Hard Confections or Lozenges
- Consolidated baked goods (i.e., cookie, brownie, cupcake, granola bar, etc.) or Pressed Pills and Capsules

### **Compliance with all health and safety protocols regarding COVID-19**

#### **Minimum Sanitation, Pesticide Use, COVID-19 Measures and Workplace Safety Conditions SOP**

CCC and our cultivation facility will be maintained in a safe, sanitary, and clean manner, with all operations in the compassion center and cultivation, receiving, inspecting, transporting, segregating, preparing, manufacturing, packaging, and storing of medical marijuana and marijuana products conducted in accordance with adequate sanitation principles. Throughout this document CCC will include our cultivation facility even if managed by an outside management company as they will be required to follow the same policies and procedures to ensure compliance.

Both facilities will meet the following minimum specifications, including having and maintaining:

- An adequate supply of potable hot and cold water.
- Non-porous, non-absorbent and easily cleanable floors, walls, and ceilings in areas where marijuana is cultivated, manufactured, and stored.
- Lavatory facilities must be readily accessible to employees that comply with the Rhode Island State Plumbing Code, [510-RICR-00-00-3](#).
- CCC and the cultivation facility will have adequate hand-washing area(s) with hand washing sinks with effective hand-cleaning and sanitizing preparations (such as soap dispensers) and disposable towels or an air dryer for hands.
- We will have adequate screening or other protection against the entry of pests and environmental contaminants.

All mechanical and electrical equipment will be maintained in a safe operating condition.





Waste disposal equipment shall be adequate with timely removal schedules to minimize the risk of contamination to medical marijuana and marijuana products, including the risk of the waste becoming an attractant, harborage, or breeding place for pests.

All waste (including all liquid, chemical, hazardous, pesticide, manufacturing solvent and chemical waste) will be stored, secured, and managed in accordance with all applicable DEM laws and regulations and all applicable federal, state, and local statutes, regulations, ordinances, or other legal requirements. Specific instructions for safe destruction of any marijuana required to be destroyed and proper disposal of medical marijuana waste per § 1.6.16.

Floors, walls, and ceilings will be kept clean and in good repair, free from dust, debris, mold, mildew, and other contaminants and potentially hazardous materials.

Lavatory facilities and hand washing areas will be kept clean and sanitary and in always working condition.

Toxic cleaning compounds, sanitizing agents, and other chemicals will be identified, held, stored and disposed of in a manner that protects against contamination of medical marijuana and marijuana products and in a manner that is in accordance with all applicable DEM laws and regulations and any applicable local, state, or federal law, rule, regulation, or ordinance.

Will comply with all relevant statutes, regulations, and requirements administered by the Federal Occupational Safety and Health Administration (OSHA), including but not necessarily limited to standards for toxic and flammable compounds and air contaminants. We will ensure compliance with OSHA.

All persons working in direct contact with medical marijuana and marijuana products will conform to hygienic practices while on duty, including but not limited to maintaining adequate personal cleanliness and washing hands thoroughly in an adequate hand-washing area before starting work and at any other time when the hands may have become soiled or contaminated.

Any person whose medical condition, as determined by medical examination or as observed by a supervisor, poses or reasonably appears to pose a risk of contamination of medical marijuana and/or medical marijuana products will be excluded from medical marijuana operations until the condition is cleared. Medical conditions posing a risk of contamination include but are not necessarily limited to open lesions, including boils, sores, or infected wounds, or any other abnormal source of microbial infection.

CCC will not permit the entry of any animal into the premises. Service animals (as defined in the Americans with Disabilities Act) are exempted from this prohibition in retail areas or other areas where there is no cultivation, manufacturing, or packaging of medical marijuana products.

In addition, to the safety and sanitary equipment including personal protective equipment that CCC furnishes our employees involved in marijuana manufacturing and extraction pursuant per § 1.6.10(D), CCC will also furnish employees with proper safety equipment for other types of





work assigned as part of operations. CCC will not be extracting or manufacturing. These are guidelines if such an operation was to begin.

The cultivation process will use best practices to limit contamination of medical marijuana and marijuana products, including but not limited to mold, mildew, fungus, bacterial diseases, rot, pests, pesticides, and any other contaminant identified as posing potential harm.

The use of pesticides on marijuana plants by CCC will not be considered a violation of these regulations provided that the products satisfy all the following criteria:

- The product must be a “minimum risk pesticide” under 40 C.F.R. § 152.25(f), incorporated above at § 1.1.7(C).
- The product must be labelled for use on all plants, other plants, bedding plants, unspecified plants, or unspecified crops.
- The label must not prohibit indoor or greenhouse use, as applicable.
- All active ingredients must be eligible for food use as determined by the federal Environmental Protection Agency’s list of (EPA) Active Ingredients Eligible for Minimum Risk Pesticide Products, incorporated above at § 1.1.7(D).  
<https://www.epa.gov/sites/production/files/2015-12/documents/minrisk-active-ingredients-tolerances-2015-12-15.pdf>
- All inert/other ingredients must be eligible for food use in accordance with EPA’s Inert Ingredients Eligible for FIFRA 25(b) Pesticide Products, incorporated above per § 1.1.7(E).  
[https://www.epa.gov/sites/production/files/2016-11/documents/minrisk\\_inert\\_ingredients\\_w\\_tolerances\\_2016-11-16.pdf](https://www.epa.gov/sites/production/files/2016-11/documents/minrisk_inert_ingredients_w_tolerances_2016-11-16.pdf)
- The product must be a currently registered pesticide product eligible for sale in Rhode Island as determined by DEM. To verify a product’s registration in Rhode Island, CCC will consult the online National Pesticide Information Retrieval System through the Center for Environmental and Regulatory Information Systems.  
[http://npirspublic.ceris.purdue.edu/state/state\\_menu.aspx?state=RI](http://npirspublic.ceris.purdue.edu/state/state_menu.aspx?state=RI).
- The product must be used in accordance with all use instructions on the label.

No application of pesticides shall be made after the vegetative stage of growth of the cannabis plant. The vegetative stage of growth should be determined by visual buds or flowers or by proxy of the plant receiving less than eighteen (18) hours of light in a twenty-four (24) hour period.

Pesticides shall be identified, held, stored and disposed of in a manner that protects against contamination of medical marijuana and marijuana products and in a manner that is in accordance with any applicable local, state, or federal law, rule, regulation, or ordinance.

CCC will keep detailed records of any pesticide products used and application regiments, including video recording during pesticide applications which must cease if there is a failure or disruption of the video surveillance system. This record-keeping requirement is independent of



that required of commercial pesticide applicators by DEM and is intended to apply in addition to that requirement, where relevant.

### **COVID-19 Safety Plan**

A sign will be posted outside of the CCC patient entry advising that only two people are allowed at a time within the entry mantrap. Patients waiting to approach the reception window will stand at the clearly marked line placed on the floor which will be at a minimum of 6' from the reception window.

The receptionist will ask the appropriate COVID-19 questions and follow all DBR regulations to include screening measures. All information will be documented.

There will be a clear plastic secure shield placed at the reception desk dividing the receptionist from anyone who approaches the desk through the mantrap.

Social distancing lines will be placed outside of the business for patients that are waiting to enter. These lines will be at a minimum of 6' apart and clearly marked. People standing in line will be encouraged to wear masks and maintain proper social distancing.

Masks are to be always worn at CCC unless you are working within the confines of your own office. Face coverings can be a bandana, a scarf or a homemade mask.

Masks will be kept at CCC if someone forgets their mask or does not have one. Masks must cover the mouth and the nose.

Only two people will be allowed in the CCC break room at the same time and must maintain 6' of distance.

There will be no employee meetings during COVID-19. Any pertinent information will be shared via email or ZOOM platforms.

Only two people will be allowed in the meeting/library room at the same time and must maintain 6' of distance.

Employees will be encouraged to wash their hands frequently with soap and warm water. Signs will be placed in the restrooms and breakroom reminding people to wash their hands.

Social distancing lines will be clearly marked inside of the point of sales area. Only four patients will be allowed in this area at any given time.

Plexiglass shields will be erected on the counters to protect the employees working in the point of sales area.

Hand sanitizer stations will be located at all entrances and exits as well as throughout CCC. Each register in the point of sales area shall have hand sanitizer.



CCC employees showing up for work at the same time will enter the building one at a time with no congregating in the parking lot or outside of the entry door. Once entry has been made by the employees, they will maintain at a minimum a 6' of social distancing.

Employees, patients, or anyone else with business at CCC are encouraged to stay home if they are not feeling well or show any symptoms of COVID-19.

Delivery people at the delivery mantrap are required to always wear masks. Delivery people will be identified, and the appropriate COVID-19 questions will be asked.

All documentation is for the purpose of contact tracing.

Any person or employee that has come into contact with someone that has COVID-19 will not be allowed at CCC and will follow the protocol devised by the RIDOH.

If an employee tests positive for COVID-19, they will not be allowed on the CCC premises and must isolate themselves and follow the protocols of the RIDOH. Any other employees that were in close contact with the affected co-worker will stay home under quarantine and follow the recommended procedures of the RIDOH.

CCC personnel will frequently disinfect the entry and exit door handles, the reception counter, and the point of sales counters and anywhere else that people have physical contact. The RIDOH protocols will be followed.

CCC employee stations, especially the reception area and the point of sales area, will be disinfected once per hour with bleach or Lysol spray.

CCC will be cleaned and sanitized each night at the close of business. Hand sanitizer stations will be re-filled as needed and masks will be replenished.

CCC employees will not congregate in the parking lot after their shift. They will be required to leave the premises immediately.

Signs with the RIDOH guidelines and the CCC Covid-19 regulations will be posted outside the patient entry, the delivery entry and throughout the interior of CCC.

The RIDOH guidelines for Covid-19 will accompany this policy.

Information on Covid-19 can be found at <https://health.rh.gov/covid/>

## **CC Exhibit F – Compassion Center Premises Requirements**

Attach hereto as CC Exhibit F, per § 1.2(C)(4)(f) of the Regulations, is all the information responsive to paragraphs (i) through (vi) below.

Is the applicant proposing **alternative locations** in the same zone under this application?

Yes    ☐                      No    ☒

If “Yes”, then Application must provide a complete response to paragraphs (i) through (vi) below for each proposed location.

Applicant’s response must demonstrate its understanding of, and ability to comply with, the requirements under the Act and the Regulations and include without limitation:

- i. A description of the proposed Licensed Premises, including street address, plat/lot number and zoning district.
- ii. Evidence of compliance for the location(s) with the local zoning laws in the form of a certificate or letter from an authorized zoning official;
- iii. Evidence that the physical location is not located within one thousand feet (1,000’) of the property line of a preexisting public or private school in compliance with R.I. Gen. Laws § 21-28.6-12(f)(2) as demonstrated by a GIS Map or other similar municipal map showing Applicant’s property, and the 1,000 foot distance from the property line of any schools;
- iv. A draft diagram, shown to scale, no smaller than 8.5” by 11” and no larger than 11" X 17", of the proposed facilities showing:
  - (1) Where medical marijuana will be stored, processed, packaged, manufactured and dispensed;
  - (2) The restricted-access areas, limited-access areas, walls, partitions, entrances, exits and location of security alarms, cameras, and surveillance recording equipment locations;
  - (3) Patient access areas including areas designated for patient enrollment, waiting, and education;
  - (4) Any public transportation services nearby,
  - (5) A diagram of all proposed on-site and off-site parking capacity (including spaces for persons with disabilities);
  - (6) How the facility will provide ADA-compliant access for persons with disabilities; and
  - (7) The location of the facility relative to streets and other public areas, and any other relevant information;
- v. A description of objective parameters (such as distances from streets and public areas) and/or proposed measures (such as black-out window shades) that ensure that marijuana at the premises shall not be visible from the street or other public areas; and

- vi. Documents evidencing either ownership of property or lease agreement with owner of property to allow the operation of a compassion center on the property, if property has already been purchased or leased at the time of the application or a signed letter of intent for such a sale or lease.

**Exhibit F Signature page**

**[ATTACH AND SIGN BELOW]**

<u><i>Garret Cardillo</i></u>	<u>12/14/2020</u>
Signature of Authorized Signatory	Date

Garret Cardillo  
Printed Name  
Print Title: Compliance Officer  
Print Name of Applicant/Licensee: Cann Cure Compassion Inc.



## **CC Exhibit F – Compassion Center Premises Requirements**

### **Cann Cure Compassion, Inc.**

#### **Description of Proposed Licensed Premise**

The proposed location of Cann Cure Compassion Inc. is in the town of Warwick, Plat 285, Lot 0123, otherwise referred to as 10 Messenger Drive, Warwick, RI 02888. Zoning district is not listed for this address; however, this location is listed in Zone 4 of this application. Additional information regarding the Property Record Card from Vision Appraisal:



[REDACTED]

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

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

[REDACTED]

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

[REDACTED]

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

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

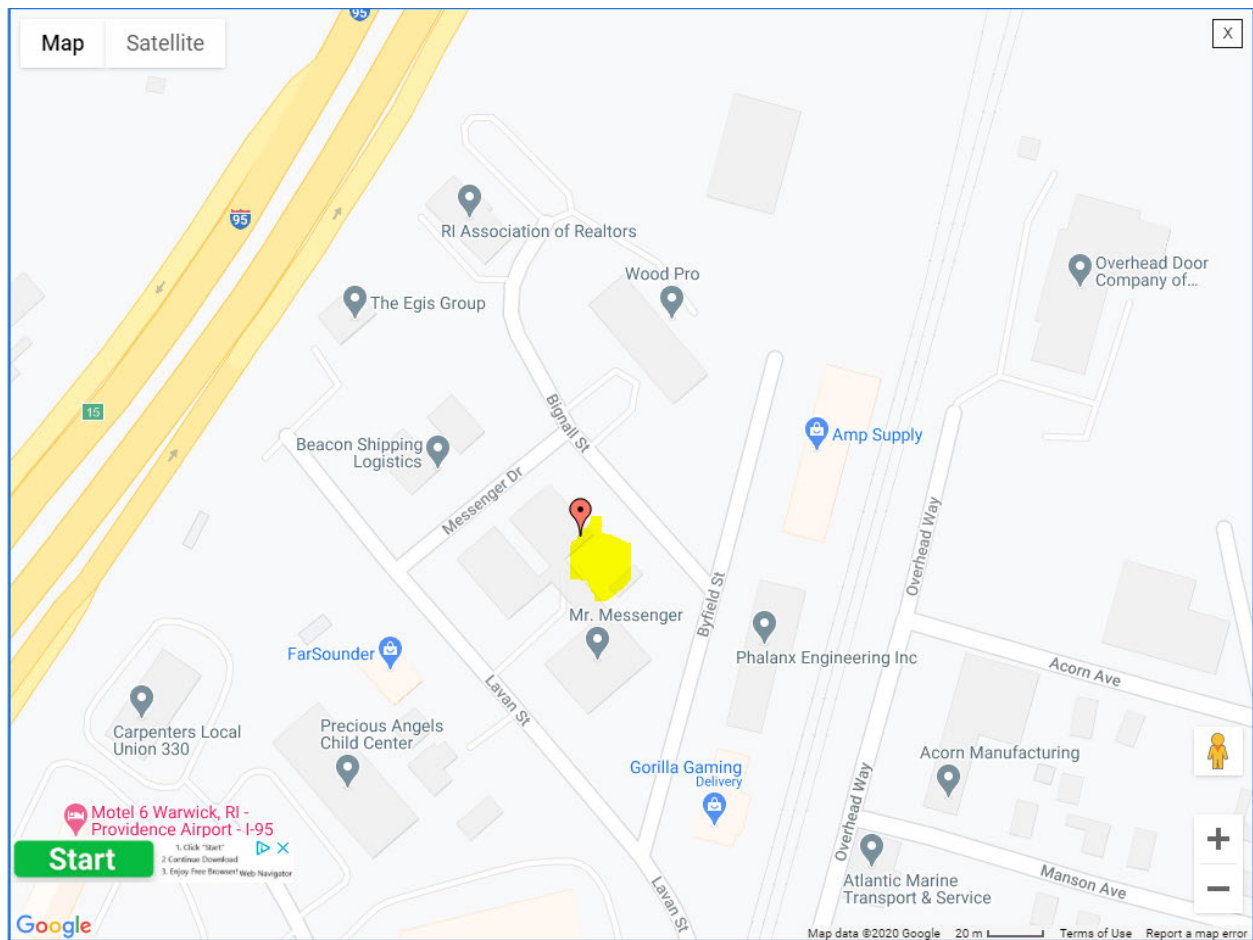
**Evidence of Compliance for Location**

10 Messenger Drive, Warwick, RI 02888, has already been approved by the DBR, meeting all regulations for a Medical Marijuana Cultivator License. Cann Cure Compassion Inc. will be constructed on the same land plot, adjacent to Cann Cure Cultivation LLC (License Number MMP CV 0072).



## Physical Location Distance Qualification

This location has already been approved by the DBR, meeting all regulations for a Medical Marijuana Cultivator License, including the required distance of 1,000ft of the property line from any preexisting public or private school, in compliance with R.I. Gen. Laws § 21-28.6-12(f)(2). As demonstrated from the map below. Cann Cure Compassion Inc. will be constructed on the same land plot, adjacent to Cann Cure Cultivation LLC (License Number MMP CV 0072).

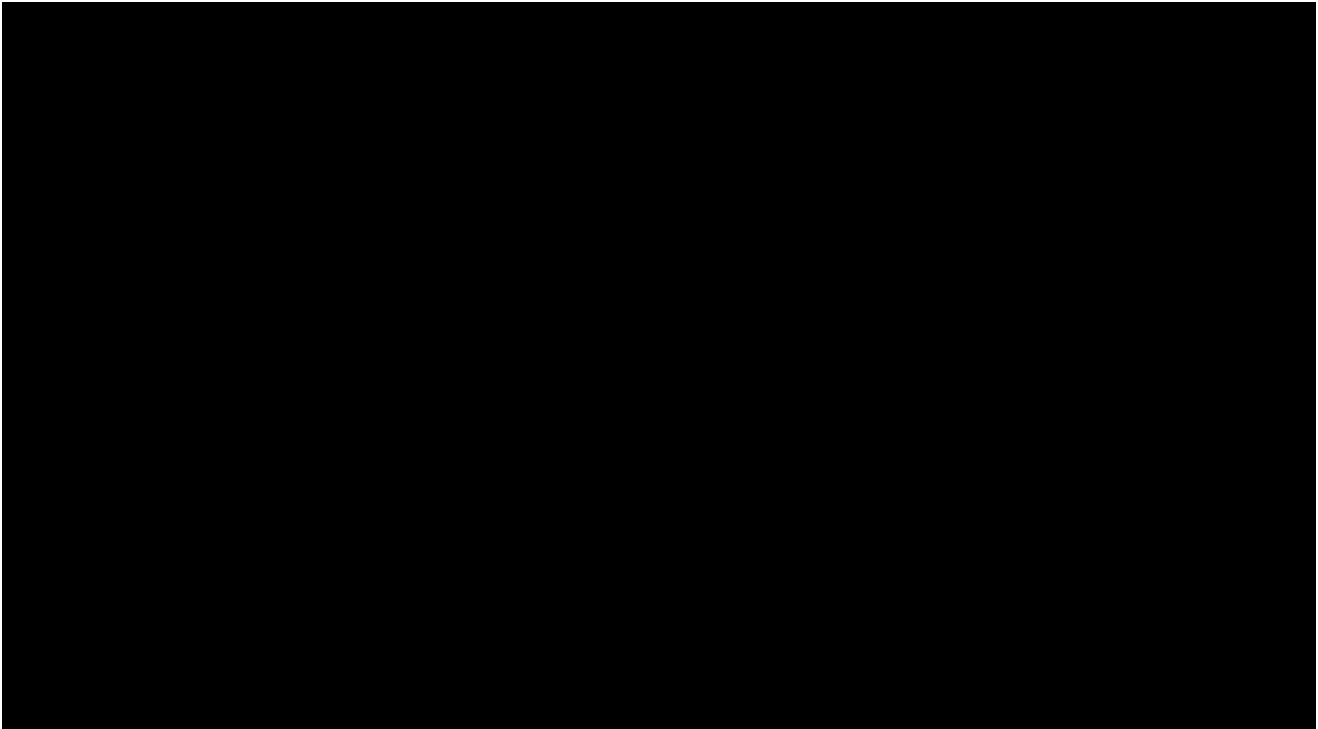




## Draft Diagram

The below diagram presents a draft of a proposed floor plan of the building at a scale of 1" = 3'. This site plan is subject to change, after consulting with the Warwick Planning department, as well as McGeorge Architecture. The proposed draft plan details:

- Where medical marijuana will be stored and dispensed
- Restricted access areas, limited access areas, and security features including location of secure doors, cameras, and security recording equipment.
- Patient access areas including enrollments, waiting, and education.



## Public Transportation:

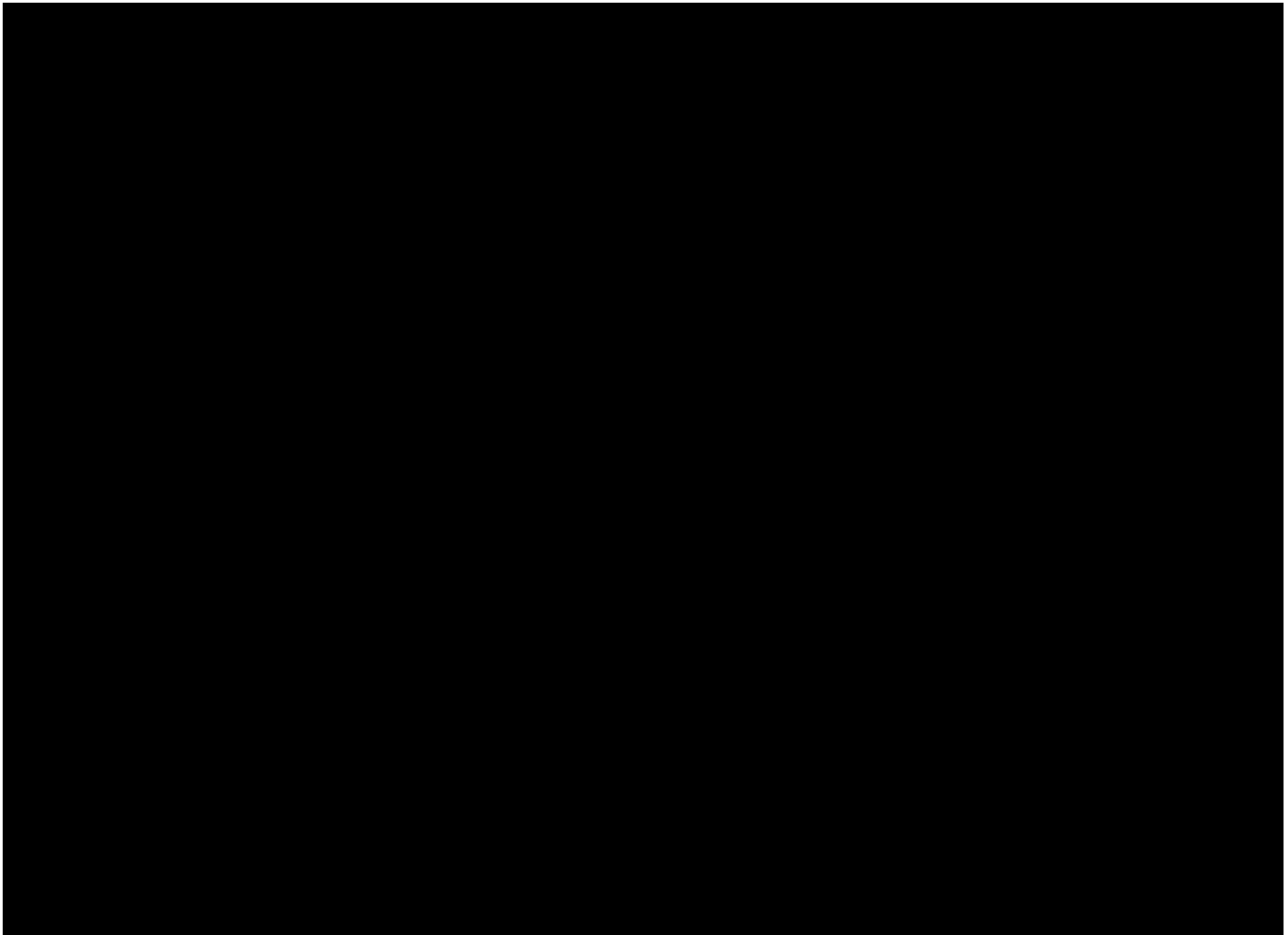
Public Transportation is located at the Jefferson Before Cypress Bus Stop, located on the corner of Jefferson Blvd and Jefferson Park Rd. This bus stop is roughly .4 Miles away from the proposed Cann Cure Compassion center, allowing patients to walk to the compassion center in 8 minutes.



### **Diagram of Proposed On-Site/ Off-Site Capacity**

The below diagram details:

- Existing on-site parking. Additional spaces may be converted to handicap access spaces as required
- The proposed building is at ground level. A full building renovation will ensure all ADA requirements are met. A final inspection will be performed and revisions to the facility will be completed to ensure compliance with all ADA guidelines and recommendations.
- Existing adjacent streets and buildings are shown.



### **Objective Parameters**

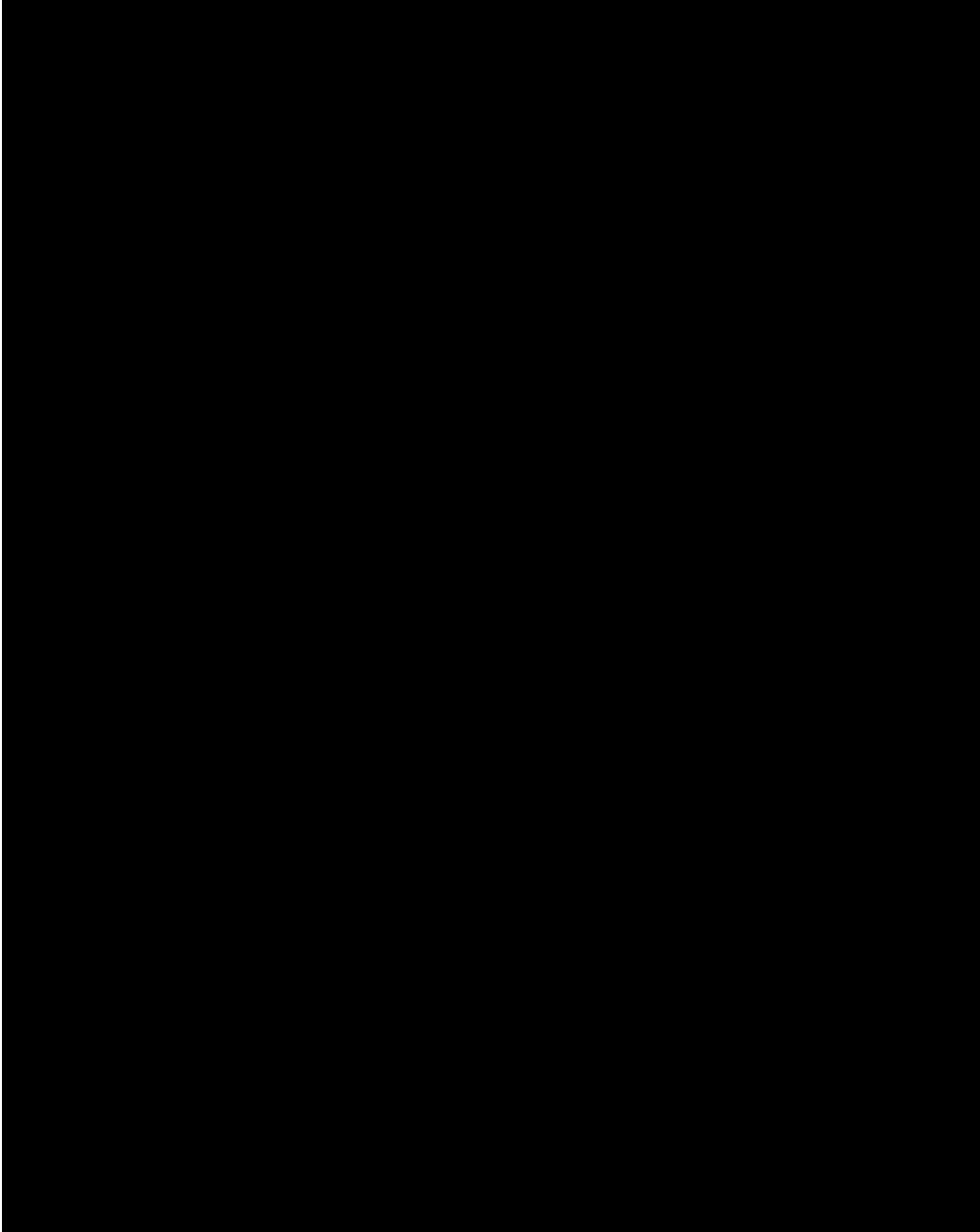
Our proposed location to site Cann Cure Compassion Inc. is at 10 Messenger Drive, Warwick, RI 02888. We understand the concerns of our towns and neighbors quite well which is why we decided on this location. It lies adjacent to a commercial 4-lane highway, inside of an industrial park. The property is zoned commercial and characterized as large business. The building is in a



remote location. To obstruct the view of marijuana or marijuana products from the public, and as part of the safety plan, all windows will be covered to prevent people from looking into the facility.

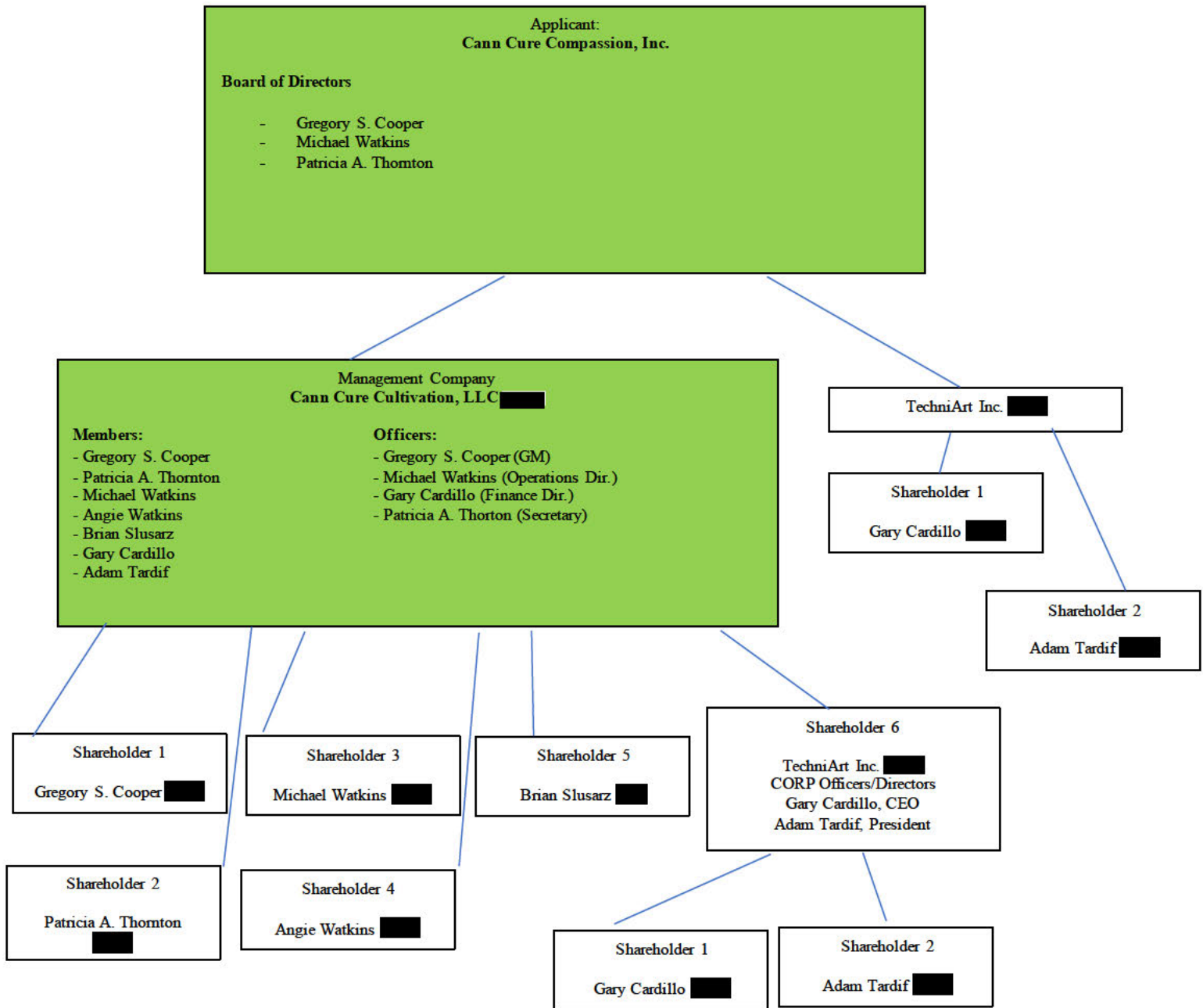
### **Documents Evidencing Ownership**

10 Messenger Drive, Warwick, RI 02888 was purchased by TechniArt Inc. on July 30<sup>th</sup>, 2020.  
As depicted below:



## Appendix A – CC Form 2 Organizational Chart Example

### Cann Cure Compassion, Inc. Organizational Chart





## **Appendix B – CC Form 2 Sample Schedule of Effective Ownership Interests**

\*All salaries and annual compensations listed below are proposed for forecasting purposes. All salaries and annual compensations are subject to change once Cann Cure Cultivation LLC and Cann Cure Compassion Inc. are operational.

	Officers/ Directors/ Managers/Board		Salary	Annual Compensation	Cann Cure Compassion Inc.	Cann Cure Cultivation LLC
1	President/ Board Member				X	
2	Vice President/ Board Member				X	
3	Treasurer/ Secretary/ Board Member				X	
4	Compliance Manager				X	
5	Dispensary Manager				X	
6	Security Consultant				X	
	Staffing Cann Cure Cultivation LLC (Management Company)		Salary	Annual Compensation	Cann Cure Compassion Inc.	Cann Cure Cultivation LLC
1	General Manager/ Managing Member					X
2	Head Cultivator					X
3	Chief Financial Officer					X
4	Human Resources					X
5	Chief Security Officer					X
6	Quality Control Manager					X
7	Inventory Manager					X
8	Cultivation Team Member					X
9	Packaging & Labeling Lead					X
10	Trimming, Curing, & Packaging Lead					X