

Application Narrative

The purpose for this submittal is a renewal to an existing conditional use permit and removing the 5-year annual renewal requirement for the existing marijuana dispensary at 7320 E Butherus Dr. Suite 100 and issued to Green Sky Patient Center of Scottsdale dba Trulieve. This facility will dispense marijuana and is licensed by the Arizona Department of Health Services.

Conditional Use Permit Criteria

Damage or nuisance arising from noise, smoke, odor, dust, vibration, or illumination.

The operations of this use (i.e., the retail sales of marijuana products) will continue to not create a detriment to public health, safety, or welfare in the form of smoke, vibration, noise, dust, or illumination. A sophisticated air purifier system is used to ensure that odor is not detectable outside of the facility.

Impact on surrounding areas resulting from an unusual volume or character of traffic.

The location of the proposed marijuana dispensary is a commercial area and has been a dispensary for over five years. As this is a commercial use without unusual volume, there has not been any impact on the surrounding areas in the form of an unusual volume or character of traffic.

The characteristics of the proposed conditional use are reasonably compatible with the types of uses permitted in the surrounding areas.

The proposed use will be a retail facility in a commercial area. Therefore, it is compatible with the types of uses in the surrounding area.

Additional conditional use permit criteria, as outlined in Section 1.403 of the Zoning ordinance.

The location of the proposed marijuana dispensary is 1) more than 500 feet from any residential use or the residential portion of a Planned Community or any portion of a Planned Residential Development with an underlying zoning district comparable to residential zoning districts, 2) more than 500 feet from any elementary or secondary school, and 3) more than 1,320 feet from another marijuana use. All distances were measured from the wall of the proposed facility nearest these uses to the nearest property line of these uses.

The proposed marijuana dispensary will operate between the hours of 8:00 a.m. and 7:00 p.m., Monday- Sunday, with optionality to operate until 10:00 p.m. upon landlord approval, which would be submitted to the city and police for site files.

Product Security

Product Quantity

Trulieve will limit its inventory of marijuana and marijuana-infused products to meet the needs of patients and customers while remaining in compliance with all state and local laws and regulations.

Dutchie Inventory Tracking System

The Dispensary's inventory control system, known as Dutchie, is an internet-based comprehensive marijuana inventory and sales tracking system that complies with all State of Arizona laws and Department regulations pertaining to the cultivation, processing, tracking, identification, transfer, transportation and sale of marijuana. Dutchie is a fully integrated seed-to-sale tracking software that tracks all marijuana seeds, plants, and produce and verifies product identification and weight measures.

Secure and Safe Storage

All product is stored in a secured vault or locked drawer during non-business hours. Only pre-packaged marijuana, edibles, and marijuana-infused products that are ready to be sold to a qualifying patient, or recreational users with valid identification are accessible in the secure cashier area during business hours. All products are clearly labeled and tracked within Dutchie.

Marijuana is pre-packaged and labeled using secure packaging before being sold to customers. The packaging will be tamper-proof ensuring that the marijuana is not subject to humidity or other external factors. Keeping the product in tamper-proof packaging helps reduce the risk of theft, spoilage, and damage to the product.

At the dispensary, marijuana, edibles, and marijuana-infused products will be stored in enclosed, locked locations. These locations include secure devices, display cases, cabinets, and rooms, all protected by locks or locking mechanisms. Packaged, sealed products will be stored in the secure access-controlled dispensing area (Cashier Stations) during business hours and will be stored in a locked drawer or inside the secure vault during non-business hours.

Once the marijuana, edibles, and marijuana-infused products are purchased from a licensed cultivation or production facility, the product will be entered into the Dutchie System. Once the product has been entered in the Dutchie System, the product will be securely moved into the vault for storage and safekeeping.

From the main vault, the dispensary Manager on Duty will transfer enough marijuana, edibles, and marijuana-infused products for one day's operations into the access-controlled dispensing area/cashier station to which only authorized personnel will have access.

Waste Disposal

Contaminated and unwanted marijuana, edibles, and infused products are stored in a properly labeled secure container in a designated quarantined area, located within the climate-controlled dispensary vault. All products located in the designated quarantined area pending destruction and disposal are destroyed within 24 hours of receipt into the dispensary. All destruction is performed by facility agents, using protective equipment, within a well-ventilated area monitored by video surveillance.

Prior to destroying contaminated and unwanted marijuana, facility agents will complete a Marijuana Disposal Form to document any such disposal, which will include the description of and reason for the marijuana being disposed of including, if applicable, the number of any failed or unusable plants; the date of disposal; the method of Disposal, the name and registry identification number of the

facility agent responsible for the disposal.

With regard to the method of disposal of unusable marijuana, the Dispensary will engage a multi-step process for doing so, including the following steps, which shall prevent any further use of unusable marijuana:

- The ground up unusable marijuana will be mixed with vinegar and kitty litter in proportions that ensure any such unusable marijuana is not identifiable within, and not retrievable from, the non-marijuana grow material and media; and
- The resulting mixture will be disposed of in an acceptable manner for organic plant waste, in compliance with all applicable laws and rules of any state, county or local government.

Transportation

Transportation of marijuana plays a vital role in a safe, successful, and patient-oriented marijuana establishment. Trulieve will continue to use the following procedures and guidelines to ensure the needs of patients, customers, employees, medicines, and the community are best served.

Transportation to/from Licensed Dispensaries and Cultivation Facilities

Facility agents shall follow these procedures and guidelines when transporting marijuana to/from other licensed marijuana dispensaries and cultivation facilities.

Guidelines

- Facility agents who qualify to transport marijuana must possess a current, valid Driver's License and have successfully completed Trulieve's Transportation Training. As with all dispensary employee-agents, those who deliver marijuana must also pass a criminal background check.
- Deliveries and movements of marijuana-based medicines will always occur using an unmarked vehicle equipped with and monitored by a GPS system, if applicable the transportation vehicles will also be equipped with a recording device that complies with chapter 18 of the adult use transportation regulations.
- Marijuana or marijuana product will always be transported in a secured container within the transport vehicle.
- No product will ever be visually seen inside the transport vehicle.
- Cash will always be stored in a locked safe within the delivery vehicle.
- All marijuana, edibles, and infused products will be placed in a secure, non-transparent transportation box in the vehicle's trunk.
- Vehicles used for deliveries shall be duly registered in Arizona and be covered by an active insurance policy. Vehicles should have no less than 1/2 tank of gasoline.
- Vehicles used for deliveries must be properly maintained, using dealership standards.
- Facility agents shall always travel with at least one mobile phone with no less than one half battery life.
- Facility agents shall follow all applicable traffic laws including, but not limited to, using a hands-free device while using the phone in the vehicle.
- Facility agents shall wear his/her state-issued credentials and shall be visible at all times
- Vehicles used shall be equipped with GPS tracking device that stores routes taken with time stamps and can be recorded and monitored remotely by the Manager on Duty.
- Prior to departure, the facility agents must complete a Trip Plan, Manifest, Invoice and turn by turn directions.

Procedure

Marijuana to another dispensary or cultivation site;

The Dispensary will utilize its inventory control system Dutchie to document its provision of

marijuana to a facility agent of another dispensary and will input all required information (see below) into the inventory control system immediately upon releasing any marijuana from the Dispensary building. The required information to be input by a facility agent upon any provision of marijuana to a facility agent of another dispensary will include:

- The amount, strain, and batch number of marijuana provided
- The name and registry identification number of the other dispensary
- The name and registry identification number of the facility agent who received the marijuana on behalf of the other dispensary
- The date the marijuana was provided

Receiving Marijuana from another dispensary or cultivation site;

An authorized facility agent will visually inspect all marijuana products that arrive at Trulieve to ensure there are no signs of mold or insects. Any unsuitable product will be destroyed according to the procedures outlined in the Security Plan for product disposal.

Trulieve will record the following information regarding acquired marijuana products into Dutchie:

Marijuana from another dispensary:

- A description of the marijuana acquired, including the amount, strain, and batch number
- The name and registry identification number of the dispensary providing the marijuana
- The name and registry identification number of the facility agent providing the marijuana
- The name and registry identification number of the facility agent receiving the marijuana on behalf of the dispensary
- The date of acquisition

Cultivated marijuana:

- The batch number
- Whether the batch originated from marijuana seeds or cuttings
- The origin and strain of the marijuana seeds or cuttings
- The number of marijuana seeds or cuttings
- The date the marijuana seeds or cuttings were planted
- A list of all chemical additives, including non-organic pesticides, herbicides, and fertilizers used in cultivation
- The number of plants grown to maturity
- Harvest information, including:
 - Date of harvest
 - Final processed usable marijuana yield weight
 - Name and registry identification number of the facility agent responsible for the harvest

The disposal of marijuana that is not usable, including the;

- Description of and reason for the marijuana being disposed of, including, if applicable, the number of failed or other unusable plants
- Date of disposal
- Method of disposal
- Name and registry identification number of the facility agent responsible for the disposal

Edible food products infused with marijuana from another dispensary:

- A description of the edible food products received from the dispensary, including total weight of each edible food products and estimated amount and batch number of the marijuana infused in each edible food product
- The name and registry identification number of the dispensary and the facility agent providing the edible food products to the receiving dispensary and facility agent receiving the edible

food products on behalf of the receiving dispensary

- The date the edible food products were provided to the Dispensary

Trulieve will maintain all inventory-related documents for at least five years from the date the document was created and will provide all documentation to the Department for review upon request.

Product Labeling and Analysis

Trulieve will ensure that all marijuana or marijuana product provided to qualifying patients, caregivers, or recreational users complies with packaging and labeling requirements in A.R.S 36-2860(A)

- The dispensary's registry identification number
- The dispensary's establishment number
- The amount, strain, and batch number of marijuana
- The form of marijuana or marijuana product
- If applicable the weight of the edible product
- In compliance with table 3.1 the potency of the marijuana or marijuana product based on the testing from the marijuana testing facility, including the milligrams per designated unit or percentage of: total tetrahydrocannabinoid, total cannabinoid, or any other cannabinoid which makes claim related to the effect of the cannabinoid on the human body
- The following statement "ARIZONA DEPARTMENT OF HEALTH SERVICES' WARNING: Marijuana use can be addictive and can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection. Marijuana use may affect the health of a pregnant woman and the unborn child. KEEP OUT OF REACH OF CHILDREN. Using marijuana during pregnancy could cause birth defects or other health issues to your unborn child."
- If not cultivated by the dispensary, whether the marijuana was obtained from a qualifying patient, a designated caregiver, or another dispensary
- The date of manufacture, harvest, or sale
- A list of all chemical additives, including non-organic pesticides, herbicides, and fertilizers, used in the cultivation and production of the marijuana
- The registry identification number of the qualifying patient
- A QR Code that will direct patients and customers to a Certificate of Analysis that includes all required testing information

For all marijuana provided by Trulieve to another dispensary, the labeling will include:

- The dispensary's registry identification number
- The amount, strain, and batch number of marijuana
- The date of harvest or sale
- A list of all chemical additives, including nonorganic pesticides, herbicides, and fertilizers, used in the cultivation and production of the marijuana

For all edible food products infused with marijuana the labeling will include:

- The dispensary's registry identification number
- The amount, strain, and batch number of marijuana
- The following statement "ARIZONA DEPARTMENT OF HEALTH SERVICES' WARNING: Marijuana use can be addictive and can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection. Marijuana use may affect the health of a pregnant woman and the unborn child. KEEP OUT OF REACH OF CHILDREN. Using marijuana during pregnancy could cause birth defects or other health issues to your unborn child."
- If not cultivated by the dispensary, whether the marijuana was obtained from a qualifying

- patient, a designated caregiver, or another dispensary
- The date of manufacture, harvest, or sale
- The total weight of the edible food product
- A list of all chemical additives, including non-organic pesticides, herbicides, and fertilizers, used in the cultivation and production of the marijuana

While in the dispensary, a facility agent will report to the General Manager any health condition that may adversely affect the safety or quality of any marijuana with which the facility agent may come into contact. Trulieve will ensure that all facility agents receive appropriate training regarding reporting adverse health conditions and that the policy regarding reporting is enforced.

If the General Manager determines that a facility agent has a health condition that may adversely affect the safety or quality of the marijuana, the General Manager will prohibit the facility agent from direct contact with any marijuana or equipment or materials for processing marijuana until it is determined that the facility agent's health condition will not adversely affect the marijuana. In addition, the facility agent will have no interaction with patients or caregivers. Trulieve will ensure that all facility agents receive appropriate training regarding reporting adverse health conditions to the General Manager and that the policy regarding reporting is enforced.

Medical Director

Trulieve will appoint William D. Troutt, NMD, as its Medical Director. As Medical Director, Dr. Troutt will be present onsite or available by telephone during the hours of operation.

Trulieve is committed to providing employees and patients with training and up-to-date information that will help them better understand the legal, operational and medical issues regarding the use of marijuana and marijuana-infused products. Employees will be trained before working in the dispensary and will be required to fulfill mandatory on-going training and evaluations. Patients will be offered access to patient education materials and free seminars created and organized by Dr. Troutt. Dr. Troutt has consulted with thousands of medical marijuana patients, top physicians, researchers, public servants, and industry leaders on a wide array of medical marijuana issues, and he has conducted dozens of lectures on various aspects of medical marijuana.

The main components of Trulieve's employee training plan include the following:

- New Employee Training and Education
- Trulieve Medical Training/Cannabis Fundamentals
- Annual Employee Training and Education
- Annual Employee Evaluations
- Employee and Patient Education Materials
- Daily staff meetings

Initial Employee Training

Upon hire, new employees are enrolled in the company's Learning Management Software where they will complete a series of interactive online training modules that cover all areas of or related to the business, with topics such as; Culture, Employee Benefits, Compliance and Legal, Systems & Software, Security and Product Education. All employees will also complete Medical Cannabis and Cannabis Fundamentals training presented by Dr. Troutt upon hire and once annually thereafter.

The Medical Director will also develop and distributes patient education materials. On a continuing basis, but no less than once annually, the Medical Director will update, review, and revise Trulieve' patient education materials to incorporate new medical findings with regard to marijuana and any feedback and suggestions from facility agents and the patients and caregivers purchasing marijuana from the dispensary.

Trulieve ensures that the education materials distributed to customers, qualified patients and designated patient caregivers include, at a minimum:

- Availability & Effects of Different Strains of Marijuana
- Methods, Forms, and Routes of Administration
- Prohibition on the Smoking of Marijuana in Public Places
- Alternate Medical Options
- Information About Possible Side-Effects of and Contraindications of Marijuana Use (including possible impairment with use and operation of motor vehicles or heavy machinery; caring for children; or job performance)
- Information about potential drug-to-drug interactions to include alcohol, prescription drugs, non-prescription drugs, and supplements
- Techniques for the use of medical marijuana and marijuana paraphernalia
- Signs and Symptoms of Substance Abuse to include tolerance, dependency, and withdrawal
- A List of Substance Abuse Programs and Referral Information
- Marijuana Smoking is Prohibited in Public Places, and Places Exposed to Public View

Among the requirements of a facility agent dispensing marijuana is the requirement that the facility agent offer patient education and support materials to every patient or caregiver requesting marijuana. The dispensary will distribute education and support materials through its facility agents at the time of any dispensing of marijuana and will track through the Dutchie system when a patient or caregiver accepts or denies such materials.

The dispensary has developed a system for a patient or the patient's caregiver to document the patient's pain, cachexia or wasting syndrome, nausea, seizures, muscle spasms, or agitation that includes:

- A logbook, maintained by the patient and or the patient's caregiver, in which the patient or the patient's caregiver may track the use and effects of specific marijuana strains and products
- A rating scale for pain, cachexia or wasting syndrome, nausea, seizures, muscles spasms, and agitation
- Guidelines for the patient's self-assess mentor, if applicable, assessment of the patient by the patient's caregiver
- Guidelines for reporting usage and symptoms to the physician providing the written certification for medical marijuana and any other treating physicians

Dispensing Marijuana

Facility agents will adhere to the following procedure when dispensing marijuana to qualifying patients and customers.

Agent Responsibilities

Before dispensing marijuana to a customer, a qualifying patient or designated caregiver and through the use of the Electronic Verification System, the Dispensary's facility agent will;

1. Verify the qualifying patient's or designated caregiver's identity, or customers age
2. Verify that the qualifying patient, designated caregiver or customer is in immediate possession of a valid registry identification card or state issued license
3. Offer any appropriate patient education or support materials and;
4. For medical patients, verify that the amount of marijuana the qualifying patient or designated caregiver is requesting would not cause the qualifying patient to exceed the limit on obtaining no more than 2.5 ounces of marijuana during any 14-calendar-day period. If the Dispensary's facility agent is unable to complete any of the above requirements, the facility agent will terminate the transaction and refuse to dispense any marijuana. The facility agent will then complete a Denial of Sale Form
5. For adult use customers, 1oz of cannabis

Procedure

1. After approved entry into the Dispensary building by a customer, qualifying patient or designated caregiver, a facility agent of the Dispensary will electronically access the Electronic Verification System using the facility agent's particular login credentials.
2. Upon completing the verification/education requirements listed above, the facility agent will transact the sale and dispense the requested marijuana.
3. The facility agent will require a customer, qualifying patient or designated caregiver to first present payment for the specific amount of marijuana.
4. Upon completion of the sale transaction, the facility agent will update both the Electronic Verification System and the Dutchie system to reflect the sale transaction, including the amount and date.

Electronic Verification System (Point of Sale System)

Before dispensing marijuana to a customer, qualifying patient or designated caregiver, the facility agent will;

- If medical patient: enter the qualifying patient's or designated caregiver's registry identification number on the qualifying patient's or designated caregiver's registry identification card into the medical marijuana Electronic Verification System and verify the validity of the qualifying patient's or designated caregiver's registry identification card.
- If recreational customer: enter the customers identification number into the marijuana Electronic Verification System and verify the validity of the customers information.
- Before dispensing any marijuana, the facility agent will enter the following information into the marijuana Electronic Verification System for the customer, qualifying patient or designated caregiver:
 1. The amount of marijuana dispensed
 2. If applicable, whether the marijuana was dispensed to the qualifying patient or to the qualifying patient's designated caregiver
 3. The date and time the marijuana was dispensed
 4. The facility agent's registry identification number
 5. The dispensary's registry identification number