City of Lansing
Medical Marihuana Commission
Friday, May 17, 2019 2:00 PM
2500 S Washington Avenue
City Clerk’s Training Room

Meeting Agenda

1. Call to Order/Introductions
2. Approval of the Agenda
3. Approval of Minutes from 3-15-19
4. Public Comment on Agenda Items
5. Commission Appeal Hearing
   a. Louie Elias – 815 W Edgewood Blvd, Suites E & F
6. New Business & Updates
7. Public Comment
8. Excuse Absences
9. Adjournment
Timeline
Louie Elias
815 W Edgewood Blvd
Lansing, Michigan 48911

December 15, 2017 – Application submitted
December 21, 2017 – Department review of applications begins
January 30, 2018 – Initial Email to Correct Insurance Issues ........................................ 1
June 13, 2018 – Conditional Denial Letter Sent for Insurance ......................................... 3
September 18, 2018 – All Applications Rescored for Category #14 ................................. 4
February 25, 2019 – Conditional Denial Email Sent for Bond ........................................ 5
March 14, 2019 – Score and Rank denial letter sent ......................................................... 6
March 27, 2019 – Hearing Officer Appeal submitted ....................................................... 12
April 6, 2019 – Second Score & Rank denial letter sent ................................................. 58
May 3, 2019 – Commission Appeal Submitted ................................................................. 68

Exhibits Removed for Attempt to Cure on Appeal

Hearing Officer Appeal Exhibit B – Map not included in Application
Hearing Officer Appeal Exhibit F – Loan Agreement dated after Application Submitted
Commission Appeal Exhibit F – Loan Agreement dated after Application Submitted
Commission Appeal Exhibit N – Loan Agreement dated after Application Submitted
Jackson, Brian

From: Jackson, Brian
Sent: Tuesday, January 30, 2018 1:51 PM
Subject: City of Lansing Med Marijuana Insurance/Bond Issues to Review - must respond within 15 days if corrections are required

Dear Applicant,

Please be advised that the City of Lansing has completed its initial review of applications as it relates to insurance, escrow accounts and/or surety bonds only.

Ordinance sections 1300.5(B)(26) – (27) discusses the requirements to obtain a license for these specific provisions. Many of the applications submitted to the City fail to meet the minimum requirements under the Ordinance. Please review a list of the common deficiencies identified below:

- Failure to provide a copy of the insurance policy. (Declaration page alone is insufficient)
- Failure to insure adequately or includes policy language that undermines required insurance minimums of $1 million per occurrence, $1 million personal/advertising, and $2 million aggregate.
- Failure to list the City of Lansing as an additional insured.
- Improperly making the City of Lansing as an additional insured jointly and severally liable for premium payments.
- Failure to ensure that the City of Lansing as an additional insured is notified 30 days in advance of insurance cancelation by the insurance carrier.
- Failure to provide evidence that the insurance policy underwriter has a minimum A.M. Best rating of B+.
- Failure to include a proper endorsement date.
- Failure to provide either: (A) a surety bond (letter of intent) in the amount of $50,000 with the City of Lansing listed as obligee or (B) evidence of an escrow account containing $20,000.

Please review your application’s insurance, escrow accounts and/or surety bonds. If you identify any deficiencies, whether listed above or not, you must cure these deficiencies within 15 days of the date on this letter.

Please clearly label applicant name, and location address on the cover sheet of any revised insurance, escrow account or surety bond materials and email to:

City.clerk@lansingmi.gov

Or mail to:

Lansing City Clerk
c/o Deb Biehler
124 W. Michigan, 9th Floor
Lansing MI 48910

Failure to cure deficiencies will be taken into consideration by the City Clerk when assessing the completeness and sufficiency of each application.

Sincerely,

Chris Swope, Master Municipal Clerk
Lansing City Clerk

Brian P. Jackson, CMMC
Chief Deputy City Clerk
City of Lansing
517-483-4135
Fax: (517) 377-0068
Email: brian.jackson@lansingmi.gov
Web: www.lansingmi.gov/clerk
June 13, 2018

Louie Elias  
160 Michelson Road  
Rochester Hills, MI 48301

Dear Medical Marihuana Provisioning Center Applicant,

This is to advise you that your City of Lansing Medical Marihuana license application has been recommended for denial by the Office of the City Attorney for a deficiency in your insurance, escrow account, or surety bond.

The following deficiency was noted:

- The 30-day notice of termination provision in the policy only mentions informing the first name insured, and makes no mention of informing the City of Lansing as an additional insured.

Ordinance sections 1300.5(B)(26) and (27) discuss the minimum requirements for your insurance, escrow account, or surety bond in order to obtain a license.

If you do not address this deficiency with the City of Lansing within fourteen (14) days of the date of this letter, your application will be denied. Please clearly label the applicant name and location address on the cover sheet of the revised insurance, escrow account or surety bond materials and submit the required documents to the Clerk’s Office.

There are a number of City departmental approvals required. This notice does not indicate whether other departments have completed their review of your application.

Sincerely,

Chris Swope  
Master Municipal Clerk  
Lansing City Clerk

Lansing City Clerk’s Office  
Ninth Floor, City Hall, 124 W Michigan Ave., Lansing, MI 48933-1695  
517-483-4131  517-377-0068 FAX  
www.lansingmi.gov/clerk · clerk@lansingmi.gov
Good afternoon.

The bond on file for the Provisioning Center located at 815 W Edgewood Drive expired 12/4/18.

Please submit a new bond or renewal copy in 14 days from the date of this email.

Failure to submit the requested document could result in application denial and will impact your Score and Ranking.

Please contact the Clerk’s Office with any questions.

Deb Biehler
Medical Marihuana Specialist
Lansing City Clerk’s Office
124 W. Michigan Avenue | Lansing, MI 48933
T: 517-483-4132  Fax: 517-377-0068
Deb.Biehler@lansingmi.gov
Website | Facebook | Twitter

Chris Swope, CMMC/CMC
Lansing City Clerk
March 14, 2019

Wellness Lansing LLC
Louie Elias
160 Michelson Road
Rochester Hills, Michigan 48301

Dear Provisioning Center Applicant,

The Lansing City Ordinance section 1300.6 discusses Provisioning Center license application evaluation. Your score of 80 out of 100 eliminates the possibility of scoring in the top twenty. Therefore, your application for licensure is denied.

Attached are your sub-scores based on the criteria posted on https://lansingmi.gov/1637/Medical-Marijuana and a brief summary of determining factors for each sub-score.

You will not be selected to receive a Provisioning Center license in the City of Lansing for the proposed business at 815 W Edgewood Blvd Suites E and F.

You have the right to appeal this denial of licensure within 14 days of the date of this letter by filing with the City Clerk’s Office a written statement setting forth fully the grounds for the appeal pursuant to Chapter 1300.15(c). Please note that initial appeals are referred to a hearing officer appointed by the City Clerk who will review the appeal and information submitted. The hearing officer will consider the information and make a recommendation to the City Clerk, who will make a decision on the appeal. To encourage efficiency, appeals will be conducted as a paper hearing without oral presentation. Please ensure that you include all information in your written appeal that you would like the hearing officer to consider. Appeals are limited to materials provided during the application process. No new application material will be considered on appeal.

Chapter 1300 provides that should the applicant not receive a license, one-half the application fee shall be returned. This refund will be processed after all appeals are exhausted.
If you have begun business operations pursuant to State Emergency Rule 19 and Executive Order 2017-02, you must cease operations. Operations may resume only if your appeal is granted and the requirements of the temporary operation are satisfied.

Sincerely,

Chris Swope

Chris Swope, Master Municipal Clerk
Lansing City Clerk

CC: City Attorney
    Lansing Police Department
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>LOUIE ELIAS</th>
<th>LOUIE ELIAS</th>
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<tbody>
<tr>
<td>Applicant Address</td>
<td>---</td>
<td>815 W. EDGEWOOD BLVD., SUITE E - F</td>
<td>815 W. EDGEWOOD BLVD., SUITE E - F</td>
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<tr>
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<tr>
<td><strong>1. Marketing, Advertising and Promotion</strong></td>
<td>4</td>
<td>4</td>
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<tr>
<td>Applicant provides many marketing, advertising, promotion, and minor minimization examples (e.g., main goal in marketing plan is to reduce exposure of ads to youth; will not advertise in newspapers, no flyer distribution in community; no marijuana symbols on logos; discreet signage; age-restricted website; social media; Weedmaps; Leafly; loyalty rewards program; direct mail, etc.).</td>
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<tr>
<td><strong>2. Tangible Capital Investment in the City of Lansing</strong></td>
<td>15</td>
<td>9</td>
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<tr>
<td>Applicant indicates they will initially lease the 2,340 sq. ft. provisioning center property at 815 W. Edgewood (3-year contract at $2,145 rent/month, startup cost of $88,37K) until license approval is obtained from the City (at which time they will purchase the property for $900K). Also has a 5-year lease ($5K/month rent) for a 5K sq. ft. property at 745 Lake Lansing Rd. This is intended to house both a cultivation operation (1,000 plants under a Class B license) and processing operation in Lansing. Also intends to establish its HQ in Lansing and will develop relationships with other state licensed PCs in Lansing to discuss selling them processed and cultivated products. Lacks cultivation/processing facility ownership and an optimal amount of tangible capital investment.</td>
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<tr>
<td><strong>3. Job Creation (Integrated System) Overall number of jobs created</strong></td>
<td>5</td>
<td>2</td>
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<td>Applicant only indicates there will be between 16 and 22 jobs created at the provisioning center and provides details about local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. Lacks an optimal number of jobs.</td>
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<td><strong>4. Financial Structure and Financing</strong></td>
<td>3</td>
<td>2</td>
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<td>Applicant indicates that based on initial forecasted provisioning center startup costs of $88,37K, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth value of $2.28 million (including cash on hand and in banks of $100K) and a deposit account balance statement of $254K, and a 2016 federal tax return showing $160K adjusted gross income. Lacks a clear description on how $900 purchase price of the provisioning center will be covered.</td>
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<td><strong>5. Plans to Integrate Facility with Other Establishments</strong></td>
<td>2</td>
<td>2</td>
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<tr>
<td>Applicant indicates they will integrate their provisioning center with their own Class B (1,000 plants) cultivation center to be leased at 745 Lake Lansing Rd.</td>
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<td><strong>6. Charitable Plans and Strategies</strong></td>
<td>4</td>
<td>4</td>
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<tr>
<td>Applicant indicates they plan to contribute yearly donations to the Lansing Public School District based on annual gross sales (with a focus on music and arts programs). They will also conduct volunteer work relating to youth recreation activities and participate in youth drug prevention. Will provide free transportation to veterans, indigent, and ill patients, provide discounted rates to seniors and others, get involved with the adopt-a-highway program, be involved with graffiti remediation (each employee will donate 10 hours/year in volunteer work), etc. Lacks proof of any actual payment or executed agreement. <strong>9/4 UPDATE</strong> Applicant provides proof that multiple dollar contributions have been given to both Advent House Ministries and the Greater Lansing Food Bank (totaling $775 in 2017), in addition to their pledge to contribute yearly donations based on annual gross sales. Suggestion: Change score from 3 to 4.</td>
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<tr>
<th>7. Number of Jobs at the Provisioning Center Category Thresholds:</th>
<th>5</th>
<th>5</th>
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<tbody>
<tr>
<td>Applicant indicates there will be between 16 and 22 jobs created at the provisioning center. Details local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc.</td>
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<tr>
<th>8. Amount and Type of Compensation (PC)</th>
<th>2</th>
<th>2</th>
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<tbody>
<tr>
<td>Applicant indicates all provisioning center positions (100%) will pay at least $15/hour and provides strong support details.</td>
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<thead>
<tr>
<th>9. Percent of Employees Earning At Least $15/Hour (PC)</th>
<th>3</th>
<th>3</th>
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<tbody>
<tr>
<td>Applicant indicates all provisioning center employees will earn at least $15/hour.</td>
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<tr>
<th>10. Projected Annual Budget and Revenue (PC)</th>
<th>2</th>
<th>2</th>
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<tr>
<td>Applicant provides detailed projected annual budget and revenue data (e.g., $107 million in total expenses and $1.17 million in average sales during year 1) that are understandable.</td>
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<tr>
<th>11. Sufficient Financial Resources</th>
<th>5</th>
<th>4</th>
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<tr>
<td>Applicant does not provide litigation compliance verification forms for all stakeholders. Applicant indicates that based on initial forecasted provisioning center startup costs of $88.37K, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth value of $2.28 million (including cash on hand and in banks of $100K) and a deposit account balance statement of $254K, and a 2016 federal tax return showing $160.9K adjusted gross income. Lacks a clear description on how $900K purchase price of the provisioning center will be covered. Additional point awarded for providing full stakeholder litigation history.</td>
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<tr>
<th>12. Business Experience</th>
<th>5</th>
<th>5</th>
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<tr>
<td>Applicant indicates they have 10 years of medical marijuana caregiver facility operational experience, plus decades of other applicable work experience (pharmacy, banking, human resources, property management, real estate).</td>
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<tr>
<th>13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</th>
<th>5</th>
<th>3</th>
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<tr>
<td>&quot;No Table of Contents, 1 point deducted Updated upon further review 9/27/18 (change in score 1 pointed added) Update 3/14/2019- 1 point deducted for second insurance cure letter sent. Original letter sent 6/13/2018 via email was cured. Second letter sent via email 2/25/2019 due to expiration of bond. No response within 14 days to second letter as requested.&quot;</td>
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<tr>
<th>14. Buffering between residential zoned areas and establishment</th>
<th>5</th>
<th>0</th>
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<tr>
<td>Surrounded by other buildings Updated score using a better measurement tool 9/18/18 residential zoning on north, south &amp; east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.</td>
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<th>15. Increased traffic on side streets will be scored lower</th>
<th>5</th>
<th>5</th>
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<tr>
<td>No issues Updated 9/25/18 high scores in all categories</td>
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<tr>
<th>16. Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</th>
<th>10</th>
<th>10</th>
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<tbody>
<tr>
<td>Tier 1 5 pts AvSec Plan. Strong traffic patterns, driveways, parking, and circulation. No traffic issues 5pts</td>
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<tr>
<th>17. Plan to meet with neighborhood organizations,</th>
<th>1</th>
<th>1</th>
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<tr>
<td>plan to meet</td>
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March 27, 2019

VIA UPS NEXT DAY AIR AND
EMAIL at clerk@lansingmi.gov

Clerk Chris Swope
Lansing City Clerk’s Office
Ninth Floor, City Hall
124 W Michigan Ave
Lansing, MI 48933-1695

RE: Appeal to Medical Marihuana Commission of Denial of Medical Marihuana Provisioning Center Applicant Louie Elias/Wellness Lansing located at 815 W Edgewood Blvd., Suite E-F

Dear Clerk Swope:

This Appeal is submitted pursuant to Lansing City Ordinance No. 1217 § 1300.15(e) on behalf of Medical Marihuana Provisioning Center Applicant Louie Elias operating as Wellness Lansing. The basis for this appeal is threefold: (1) Scoring Insights are based on clearly erroneous findings; (2) Scoring methods do not comply with the ordinance; and (3) Scoring was an abuse of discretion. Below is the detailed basis for this appeal.

1. Buffering between residential zoned areas and establishment.

The applicant was not awarded zero (0) out of 5 possible points and the scoring insight states:

Surrounded by other buildings. Updated score using a better measurement tool 9/18/18 residential zoning on north, south & east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.

The ordinance at §1300.13 is entitled “Location, buffering, dispersion, and zoning requirements for medical marihuana provisioning centers.” Specifically, the applicant’s location is zoned F-1 Commercial and, as such, a provisioning center is permitted in this zone. Ordinance §1300.13(B). The facility is surrounded by other buildings on the site as the scoring insight claims. However, this is a large commercial building and there is no residential in the building. This scoring category is with respect to buffering between “residential zoned areas and establishment.” There can be no deduction of points for
proximity to other commercial uses. There is no basis to deduct points for closeness of the establishment to other commercial uses.

The Lansing Zoning Ordinance defines buffering as “a physical area that separates one land use from another. Such area could be landscaped with plants and could also contain a berm, fence or other screening material.” Sec. 1290.01 (Definitions). Therefore, this is not just about measuring a distance but looking at the natural or physical screening between the uses.

The scoring insight states that zero (0) points are awarded due to a measurement tool to determine the distance between the establishment and the residentially zoned properties on the north, south, and east sides of the property. Please see Attached EXHIBIT A, which is a location area map with a satellite view. The establishment is clearly marked with the address of the property and the Google Maps pin. The map shows that there is sufficient buffering between as follows:

- **Residential Area to North marked “A” on Map.** The buffering between the establishment and the area to the North is significant. There is a boulevard with a landscaped median separating the establishment from the residential. Further, there is a significant amount of landscaping and trees on a large piece of property just south of the “A” on the map which provides buffering between the establishment and the residential property.

- **Residential Area to East marked “B” on Map.** The buffering between the establishment and the area to the East must be considered. Please see EXHIBIT B, a close up view. The properties are separated by South Washington Avenue, a major local road. The homes on the East side of Washington Avenue have large trees in front, and they face a grassy landscaped area to the South of the subject building. This grassy landscaped area serves as a buffer, and the residents are not looking out their window and viewing a medical marihuana establishment.

- **Residential Area to South marked “C” on Map.** As EXHIBIT A shows, there is significant buffering between the establishment and the residential property to the south. The first barrier and buffer is Interstate-96, which is one of the state's largest highways. The highway itself has a large landscaped berm separating the east-west traffic. Further, on either side of the Interstate, there is a long row of trees and landscaping that serves as a buffer between the highway and the properties on both the North and South side of the highway. Finally, the residents to the south are no residents of the city of Lansing.

A review of the zoning ordinance will show that this applicant has met or exceeded any buffer requirement in the zoning ordinance. There is no authority in the ordinance to only use distance as a factor when the City Council has authorized a medical marihuana
provisioning center in this zoning classification, and the establishment can show significant natural and physical buffering to separate the residential from the establishment. The Applicant should receive 5 full points in this category.

2. Tangible Capital Investment in the City of Lansing

The applicant is was deducted 6 points because it lacks cultivation/processing facility ownership and an optimal amount of tangible capital investment. The applicant submitted a tangible asset plan (EXHIBIT C) showing that the entity will make improvements to the interiors and exteriors of the subject properties, even improvements to leased space which qualifies as a tangible capital investment. For example, applicant stated “entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing.” Tangible capital investment outlined in the application at the 745 Lake Lansing Road location included the following:

- Improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors
- New exterior lighting will be installed at the facility making the community safer.
- Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.
- Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.
- All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

Whereas the scoring insights show that the reviewer considered the lease of the property at 745 Lake Lansing Road, the tangible capital improvements outlined in the application were not considered.

3. Job Creation (Integrated System) Overall Number of Jobs Created.

Applicant has provided a Job Creation Plan which shows 22 types of projected jobs. (See EXHIBIT D- Job Creation Plan). These are job types and not the total number of jobs. There are 16 employee types listed in the pay scale table on page 9 of 15 of the plan. There are 6 additional contractors and professional services agreements. The annual compensation of the 16 employee types for the provisioning center alone is $676,145 as shown on page 8 of 15. The provisioning center will have in excess of 22 actual jobs based on this budgeting. For example, a medicine tender will make $15 per hour. The plan indicates that there will be multiple medicine tenders. A facility could hire 5 full-time medicine tenders or 15 part-time medicine tenders and make it appear that there are additional jobs. This facility has
budgeted well over $650,000 per year for wages for both full and part time staff at the
 provisioning center alone. Once up and running, the grower and process facilities will also
generate additional jobs.

4. Financial Structure and Financing

The applicant lost one point due to the following: “lacks a clear description on how the
$900 (sic) purchase price will be covered.” The application contains a document entitled
“Buy and Sell Agreement” showing that the building will be financed by a mortgage. (See
EXHIBIT E, paragraph 3). The Seller approved these terms and was satisfied that the
buyer could obtain financing and is in receipt of documentation showing that the applicant
has approved financing (EXHIBIT F).

5. Sufficient Financial Resources

The applicant was deducted one point for “lacking a clear description on how the $900K
purchase price of the provisioning center” will be covered. Please see the item entitled
“Financial Structure and Financing” in paragraph 4 above which shows that the building
will be financed by a mortgage and the seller was satisfied.

6. Content and Sufficiency of Information; Professionalism of submitted
   Documentation Including Clear Labeling of Items

Points were deducted “because of letter sent via email 2/25/2019 due to expiration of
bond. No response within 14 days to second letter as requested.” On 2/25/2019, Deb
Biehler of the City Clerk’s office sent email correspondence that stated:

The bond on file for the Provisioning Center located at 815 W Edgewood
Drive expired 12/4/18. Please submit a new bond or renewal copy in 14
days from the date of this email. Failure to submit the requested document
could result in application denial and will impact your Score and Ranking.
Please contact the Clerk’s Office with any questions. /s/ Deb Biehler

EXHIBIT G is an email chain showing that on Friday, March 8, 2019 at 6:29 PM, Mr. Travis
Pollock emailed the requested bond renewals to Deb Biehler at her assigned city email
address. Ms. Biehler did not respond to this email until Tuesday March 12, 2019 at 12:12
PM and indicated “Received and under review.” The Applicant complied and provided
bond renewals within the 14 day period which would have ended at the close of business
on Monday, March 11, 2019. The Applicant should not be deducted points because the city
did not open the email until the next day.
7. Litigation History

One point was deducted because applicant filed LARA Disclosure Form 8-SA to show litigation history. (EXHIBIT H). The point was deducted because this is “not a full history.” Although the LARA disclosures only requests litigation history going back 7 years, this is a full litigation history for this applicant. The applicant had nothing to disclose. The relevant ordinance section at 1300.6(B)(4) requires consideration of whether the applicant has a record of various detrimental acts prior to the application. The applicant has not been in litigation and did not fail to disclose any prior litigation.

On behalf of the applicant, thank you for your time and consideration of this Appeal. Please contact me if you have any questions or need additional documentation.

Very truly yours,

Plunkett Cooney

[Signature]

Jeffrey M. Schroder
Direct dial: (248) 594-2796
Email: jschroder@plunkettcooney.com

JMS/nw
Encl.
EXHIBIT A
EXHIBIT B
EXHIBIT C
The entity has obtained and is under contract for lease and purchase of properly zoned buildings in the City of Lansing that comply with all ordinances and laws to conduct business for a provisioning center, cultivation site and processing facility. The entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing. Improvements to the neighborhood through financial donations and volunteer work will be performed by the entity’s staff and patients in conjunction with non-profits and charitable organizations. The entity will also strive to create as many jobs as possible employing local residents and veterans of Lansing with a focus on promoting from within the company. Employees will be paid 150% above Michigan minimum wage and will be supplied benefits.

**Planned Investment in The City Of Lansing**

(A) The entity plans for multiple licenses in the City of Lansing.

1. Provisioning Center (approx. 3,000 sq. ft. and $900,000 proposed cost).

2. Cultivation Site (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).

3. Processing Facility (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).

(B) The application being submitted is a license for a provisioning center located at 815 W. Edgewood Blvd. The entity will also submit applications for licenses of cultivation and processing facilities located at 745 Lake Lansing Road by December 31st, 2017. The proposed cultivation and processing location is 5,000 sq. ft. and will be used to grow and process 1,000 plants under a “Class B” license. As the entity is seeking to obtain three licenses: provisioning center, cultivation center and processing center, the goal of the entity is to be as vested in the City of Lansing as possible. Having two locations will require an increased workforce which will benefit the City of Lansing through local and state employee income taxes which will contribute to the City of Lansing. Additionally, the entity will be investing in the City of Lansing through purchasing and leasing multiple properties in the community which will bolster the real estate market and increase land value.
815 W. Edgewood Blvd, Lansing, MI 48911

- Lease Price – ($2,145/month or $25,740/year)
- Terms – 3 years
- Purchase Price – $900,000 to be closed upon license approval.

745 Lake Lansing Road, Lansing, MI 48906

- Lease Price – ($5,000/month or $60,000/year)
- Terms – 5 years

(C) The intent of the entity is to establish its headquarters for all operations in the City of Lansing and being fully integrated with all three licenses (provisioning, cultivation and, processing) in the community.

(D) The entity will make improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors.
(1) New exterior lighting will be installed at the facility making the community safer.

(2) Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.

(3) Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.

(4) All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

(E) Improving the properties used by the entity will entail renovating the landscape, buildings and overall aesthetics and will increase the land value in the community and surrounding neighborhood.

(F) The entity will engage in a multi-faceted community improvement program that extends beyond its member base and addresses areas of concern in the greater Lansing community.

(G) The entity plans on contributing yearly donations to the Lansing Public School District which will be based upon annual gross sales.

(1) Special focus of these donations will be for children's programs, such as designating a majority of the money to be spent on music & art programs, which require supplies and instruments.

(H) The entity will also be giving back to the community by making financial donations and doing volunteer work, engaging in youth recreational activities and participating in youth drug prevention.

(I) The facility will hire local contractors, cleaning companies, waste disposal companies and try to acquire medical marihuana from cultivators located in Lansing to help stimulate the local economy.

(J) The facility will provide financial benefits to the community in the forms of property taxes, state sales taxes, personal property taxes and employment taxes.

(1) The anticipated local tax revenues generated by the entity's operations will contribute to the local government efforts to maintain and improve its public services parks and community centers.

(K) The facility will provide transportation free of charge to veterans, indigent and ill patients to be able to obtain medicine through the use of Uber, taxis, or public and private buses.

(L) The facility will sponsor the Michigan "Adopt A Highway" program with the Department of Transportation, to assist in the improvement of the section of U.S. Highway I-96 and U.S. Highway I-496 that run through the City of Lansing.

(M) The facility will donate throughout the year to the City of Lansing parks and recreation program.
(N) The facility will offer a program for local residents, indigent patients and veterans to gain medicine at a discounted rate. The entity will have a program focused on giving discounted rates, when medically necessary, to seniors, the terminally ill, low income individuals, veterans and displaced members of the community.

(O) The facility will work with local non-profit and charitable organizations including but not limited to the VFW Post 701 and Grand River Park & Boat Launch which is part of Middle Grand River Organization of Watersheds to try and help either financially or through volunteerism to meet their specific needs and goals.

(P) The entity will take part in graffiti remediation in the community annually. Each employee will donate 10 hours a year of volunteer work.

(Q) As employees relocate to Lansing, home sales will increase and so will the land value.

(R) With the influx of new employees at the facility and new residents, a trickle-down effect of economic growth in the area will be established. Retail stores, restaurants and other businesses will enjoy greater sales and a higher profit margin.

(S) Ancillary services will focus on growing partnerships with local non-profits and community support organizations.

   (1) Violence prevention workshops will be initiated by the entity as the company feels strongly about abuse of any kind and endeavors to make Lansing as safe as possible for the community as a whole.

**Job Creation**

The entity will strive to hire 100% of local residents and veterans whom will be paid above 150% of Michigan minimum state wage. Job fairs will be held in an effort to hire local residents for employment opportunities within the facility. The entity will additionally promote from within to increase employees' wages and positions within the company.

The entity will interview, conduct background checks and designate the level of access granted to an individual for an employee Identification card. An internal check of all potential employees will occur prior to applying for state provisioning agent cards for all mentioned potential employees.

The company may choose to implement additional access restrictions at their discretion. The appointment of "key employees" and "non-key employees" is at the discretion of the hiring managers based upon a potential employee's skill sets and the position for which they applied. The following staffing plan depicts the hierarchy of this entity and its employees and how the provisioning center will benefit the citizens of Lansing.

**Training & Compensation For Employees**

(A) Monthly internal training for employees.

   (1) Customer service.

   (2) Effects and adverse reactions to medical marihuana use.
(3) Strain knowledge.

(4) Knowledge of different methods of administration of medicine that will best help with patients' specific ailment.

(5) Safety training in the facility of equipment utilized.

(B) Continuing Education.

(1) The entity will provide compensation to employees for any continuing education completed.

(2) The facility's staff will be educated about the standard operating procedures of the facility, expectations of the entity, the beneficial effects of using medical marihuana to help relieve the symptoms of specific medical ailments, and sources of information on a variety of medical and community topics.

(3) Education of employees will either be located onsite at the facility and proctored by upper level staff, completed online or obtained by attending courses at local and regional educational institutions.

**Wages For Fulltime Employees**

The entity will pay all employees a rate that is above 150% of Michigan minimum wage.

(A) 22 Types Of Projected Jobs & Rate Of Pay

(1) Chief Executive Officer - $31.25/hour

(2) Chief Financial Officer - $31.25/hour

(3) Director of Operations - $26.04/hour

(4) Director of Security - $26.04/hour

(5) General Manager - $26.04/hour

(6) Provisioning Center Manager - $20.83/hour

(7) Director Of Communications - $15.62/hour
(8) Medicine Tender – $15/hour

(9) Security - $18/hour

(10) Patient Services and Education Specialist – $15/hour

(11) Quality Assurance Specialist – $15/hour

(12) Inventory Control Specialist – $15/hour

(13) Community Outreach Coordinator – $15/hour

(14) Patient Advocacy Representative - $15/hour

(15) Bookkeeper – $25/hour

(16) Receptionist - $15/hour

(17) Secure Transportation – Based on 3rd party rate.

(18) Sanitation – Based on 3rd party rate.

(19) Laboratory Testing – Based on 3rd party rate.

(20) Legal Counsel – Based on 3rd party rate.

(21) Consultants – Based on 3rd party rate.

(22) CPA – Based on 3rd party rate.

**Plans To Integrate Cultivation Facility With Other Local Establishments**

(A) The entity will develop relationships with other state licensed provision centers in Lansing to discuss selling them processed and cultivated products.

(B) The Cultivation Center Manager will canvass the community and hold continuing education seminars at the facility to inform business owners of the facility’s existence.
(C) The entity will implement a mass marketing campaign utilizing direct mail, email blasts and our relationships gained with licensed medical marihuana testing laboratories to attract other provisioning centers to work with our cultivation facility.
EXHIBIT D
1300.5(B)(23) – Job Creation Plan

Job Creation plan includes the following: The provisioning center is committed to providing a positive work environment for the estimated sixteen employees working within our job creation plan to build strong, positive relationships and assist in making our immediate community a promising, flourishing place to live and work. It is our expectation that our plan clearly presents our provisioning center as a job creator, community oriented organization, committed to improving the lives of those around us. The following information details our job creation plan as a company and as an active partner in the Lansing community.

In support of our job creation plan, the provisioning centers will maintain a high staff-to-patient ratio in order to provide a consistent level of quality service. As patient numbers increase, the provisioning centers will adjust staffing to maintain this capability. The provisioning center has adopted a comprehensive worker training program to guide recruitment, hiring, training and managing of our employees. We will promote from within the company to increase value for both the employee and the local economic community. Highlights of the plan feature precise definition of responsibilities and clearly understood chains of authority. Well paid, well qualified, and well trained employees is a priority for the provisioning center.

(A) 22 Types Of Projected Jobs:

(1) Chief Executive Officer: As first in command, the CEO gives the provisioning center the proper strategic direction as well as creating a vision for success. He/she oversees all operations and business activities as well as develops strategies and plans that align with short-term and long-term objectives. The CEO sits on the Board of Directors and accepts all final fiscal responsibility and bottom line accountability. He/she oversees all hiring and provides feedback to the Board of Directors on performance. He/she is responsible for developing a high performing managerial team and for leading and motivating staff to promote and sustain employee engagement. For this specific position, the CEO must have in-depth knowledge of all aspects of the medical marijuana industry.

(2) Chief Financial Officer: The Chief Financial Officer sits on the Board of Directors and is responsible for planning, developing, organizing, implementing, directing and evaluating the organization’s fiscal function and performance. He/she must be well-versed in all aspects of financial management, including accounting, tax filings, banking operations, and payroll. The provisioning center’s CFO is in charge of integrating the State’s approved seed-to-sale software into the provisioning center’s accounting practices and will work with the security director to monitor inventory control systems.

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(3) Director of Operations: The operations director oversees and directs the physical operations of the entire facility from start to finish: construction of the facility, build-out of the interior, the selection and installation of all utilities and equipment, on-going maintenance, and obtaining proper permits. He/she will report to and work with the CEO and CFO to ensure accurate projected costs, adherence to timelines, inspection preparedness, and strict compliance with local and state regulations. He/she is tasked with acquiring and assigning contracting bids according to the State’s and the provisioning center’s job creation goals. The director of operations provides leadership to all departments throughout the facility by planning, identifying, communicating and delegating responsibilities to the store management team to ensure a smooth flow of operations within the company. The director of operations guides the store manager and develops their talent in ensuring customer satisfaction, and measuring financial performance. He/she will oversee the day-to-day operations of the dispensary, managing core department managers (security, communications, patient services, and inventory) while managing all strategies and tasks related to the facility, accounting, sales, marketing, and public relations. He/she has financial responsibility for the provisioning center and is responsible for successful strategy execution. He or she keeps tight control of the senior management-approved budget and oversees operations according to established policies and procedures. He/she is responsible for overall building appearance, cleanliness, comfort, functionality, safety, security, and overall customer experience. The director of operations is ultimately responsible for employees’ strict adherence to laws and regulations concerning medical marijuana. The director of operations reports to and is accountable to the CEO and the CFO.

(4) Director of Security: The Director of Security is responsible for understanding, implementing and ensuring compliance with all elements of safety and security mandated by the City of Lansing, State of Michigan and the provisioning center’s security plan. They will maintain strict vigilance regarding physical security of all patients, employees and the public and oversees the safety of staff and the security of the facility. They will also be responsible for operational awareness for the diversion and/or deviation of medicine. They are responsible for implementing the provisioning center’s design plans for the security procedures and protocols and security surveillance system, video surveillance system, and video storage. Ensuring adherence by all employees and that all systems are checked and maintained on a regular basis is a priority for the security director.
Additionally, they will be responsible for all security of the facility and its perimeter, and will train all staff as to standard security protocols. They are responsible for ensuring that all security equipment, alarms, locks, cameras and surveillance data are properly functioning, maintained and operational. They will hire and manage security guards, including conducting background checks for new employees. The security director will also work closely with the CFO to manage inventory to prevent theft and diversion. They will also oversee transportation and delivery assignments, making sure delivery manifest are properly completed and logged. They are also responsible for the security and safety of the immediate environment outside of the facility perimeter to the extent that the provisioning center's operations are safe to the welfare of the neighbors, arising from the facility's presence in the neighborhood.

(5) **General Manager**: General Manager will be responsible for the operational and management of the dispensary. The responsibilities of the General Manager include but are not limited to: the implementation and organization of day to day operations of the facility and the general welfare of all staff and patients; for assuring that the facility is in compliance with all City and State regulations; ensuring that all operations are run in strict compliance with provisioning center policies and procedures like: safe handling of medication, inventory control and tracking and loss prevention management, oversight of the packaging room and employee oversight implementing daily operational policy and procedures while being a liaison between them and the company.

(6) **Provisioning Center Manager**: Provisioning Center Managers are responsible individuals for the operational oversight and management of the provisioning center. They are also responsible for the implementation and organization of day to day facility operations and for the general welfare of all employees and patients. They have the overall purview of finished product, from logging in inventory as it arrives in the provisioning center, to accounting for cash receipts at the end of the day. They manage the inventory of the provisioning center and orders specific sorts of medical marijuana from the cultivation facility to insure adequate Inventory. The provisioning center manager will work with the director of communications and community outreach coordinator to help understand what product segments are wanted by patients and to gather feedback as to the effectiveness of medical marijuana on treated conditions. This will lead to better patient outcomes and will result in overall growth to company. The provisioning center manager will be responsible for safe handling of medication, currency,
procurement of medication, inventory control and tracking, delivery manifests, oversight of the packaging room, loss prevention management, and product recall and while also trained to handle specific emergency situations. He/she is responsible for overall customer/patient experience implementing daily operational policy and procedures while being a liaison between the patient and company. The provisioning center manager and the director of operations are responsible for assuring that the facility is in compliance with all City and State regulations. The provisioning center manager will report to the CEO and CFO.

(7) Director of Communications: The Director of Communications is responsible for all internal and external communications for the dispensary and will position the provisioning center as the premier medical marihuana provisioning center in Michigan. External communications include creation of marketing materials, website posts and updates, and ensuring all materials comply with State regulations and laws. He/she is also responsible for all employee communications, including the creation of training materials and working with the CFO to promote retention in the workplace. The director of communications will work with the dispensary manager and community outreach coordinator to help organize patients outreach by various forms of communication. The director of communications works directly with the community outreach coordinator to host monthly meetings for the public to mitigate concerns in the immediate community.

(8) Medicine Tender: The medicine tender is the company’s interface with the public. He/she is responsible for ensuring that all medical marihuana product dispensed inside the entity is done a friendly, safe, and compliant manner. They are responsible for offering advice to patients on which products would best help treat their symptoms while directing the patient to the medical marihuana strain and corresponding potency. He/she can discuss the physical properties, effects, and treatments of medical marihuana that best fits the patient’s needs. He/she is responsible for confirming identity and qualification for receipt of medication. He/she is responsible for proper cash and product transactions, and insuring each sale goes through the state certified point of sale system. After a patient has selected their medicine, the patient is brought to the check-out area where the provisioning center’s medicine tender will review the order for accuracy. The medicine tender will print the labels for each product and affix them in the proper compliant manner while processing the patient’s transaction. When educational material are requested, they will provide the necessary
paperwork for the aliment. He/she opens the store, checks inventory against the previous night’s closing inventory, reconciles cash at the end of the day, and insures that the sales have been properly entered into the point of sale system and that no patient information has been retained beyond what is allowed by law. They will dispense pre-packaged medical marihuana and will not have access to any inventory other than the inventory which in on site in security sealed child proof packaging. He/she works alongside security guard to facilitate patient transactions and to avoid theft. The provisioning center medicine tender reports to the provisioning center manager and works together with the director of communications and community outreach coordinator on patient education and product knowledge.

(9) Security: Security guards works with the security director and the medicine tenders. They are responsible for ensuring company facility, employees, patients and products are well secured in accordance with established procedures and policies. They will monitor and authorize entrance and departure of employees, visitors, vendors and other persons, asking for appropriate documentation in order to stop suspicious people and guard against theft. They is responsible for maintaining security of premises, conducting security checks, viewing security monitors, and reporting significant problems to authorities. They will complete scheduled security reports. They will maintain the provisioning center’s stability and reputation by complying with local, state laws and regulations. The security guard will have access to different types of methods needed to contact police, medical services, fire etc. when necessary.

(10) Patient Services and Education Specialist: The Patient Services and Education Specialist will meet with patients, assess their needs and actively engage them in developing a treatment and medication plan. Will compile and distribute all applicable informational and educational materials and disclosures, and will monitor the patient’s usage for signs of adverse effects or misuse. Receives comments and input from patients on a case by case basis, and conducts informal surveys of the patients for ratings as to service and satisfaction.

(11) Quality Assurance Specialist: The Quality Assurance Specialist is responsible for scales calibration and, to ensure all medicine is free from toxins, molds, pesticides and other impurities and acts as liaison with the testing laboratories. Responsible for product handling, including weighing and repackaging products for sale. Labeling and sealing all packaging. Maintaining cleanliness standards in the
handling of product. They are responsible for ordering packaging and labelling materials. Ensuring that such materials are not defective and that proper labelling and packaging of products is compliant with applicable state and city laws and ordinances.

(12) **Inventory Control Specialist:** The Inventory Control Specialist will assist the provisioning center manager in implementing and overseeing the inventory control system in coordination with METRC the approved inventory control vendor. Will monitor inventory counts. Assist in the review and revision of theft/diversion prevention procedures utilizing both the computerized inventory system and developing procedures in the handling of inventory and currency.

(13) **Community Outreach Coordinator:** The Community Outreach Coordinator will assist with the administration duties associated with patient sign-ups and community events. This role is primarily responsible for supporting the provisioning center in establishing community relationships, helping patients through the application process and prospecting new opportunities which will assist residents and improve the community. They will serve as a resource for patient calls and inquiries that come into the provisioning center. They will also provide support and organize seminars and workshops, sign-ups and community events. They will organize all necessary details for on-site events including allocating space, room setup, a/v requirements and materials. They will stay up to date with medical marihuana rules and regulations. They will serve as support for social media and electronic inquiries. The Community Outreach Coordinator will develop and implement community outreach projects every month and coordinate different ways that employees, patients, and caregivers, can volunteer and/or contribute to the community. The Community Outreach Coordinator will act as an intermediate between the facility and the community. Their primary responsibility will be to increase the public image of the facility and the proper use of medical marihuana, as well as, assess and respond to any questions, issues and/or complaints from the community. Additionally the Community Liaison will be responsible for coordinating community beautification projects to help improve the surrounding area and neighborhood.

(14) **Patient Advocacy Representative:** Patient Advocacy staff will act as a liaison between patients, doctors and related resources. Patient advocacy is an area of specialization in healthcare concerned with the advocacy for patients and caregivers. The patient advocate may be an individual or organization, often, though not always, concerned with one specific group of disorders, illnesses or treatment solutions. The facility's patient advocate will work directly with the
Institutions that are responsible for the patient's care. Typical advocacy responsibilities include but are not limited to: patient rights, matters of privacy, confidentiality or informed consent, patient representation, awareness building, support and education of patients and their caregivers.

(15) Bookkeeper: Bookkeeper will be responsible for all accounts payable and accounts receivable, inventory management, tracking of purchasing and selling of medical marihuana by the business, taxes and any other financial matters such as employee payroll.

(16) Receptionist: Receptionist will handle all patient check-ins, visitor logs and field inbound phone calls. Additionally, the receptionist will organize all documentation in regard to patient, visitor and third-party information. Receptionist will maintain clear lines of communication with the manager on duty to advise them of any issues.

(17) Secure Transportation: Drivers will be responsible for the transportation of medical marihuana products from cultivation and manufacturing facilities to dispensaries. All product will be weighed, counted and fully documented in an electronic verification system. Drivers will collect a signed manifest of all deliveries. In the case of emergency, they will report the emergency immediately to law enforcement through the 911 emergency system located inside the transport vehicle.

(18) Sanitation: Sanitation will be in charge of cleaning the facility on a nightly basis to provide a clean and sanitary environment. They will be responsible for everything from mopping floors, emptying garbage, cleaning bathrooms, wiping down counters and phones.

(19) Laboratory Testing: The laboratory will be in charge of testing products from the facility to ensure they are free of mold, pesticides and other contaminants.

(20) Legal Counsel: Legal Counsel will be responsible for any and all aspects of legal issues that may arise for the business. Legal counsel will also assist in helping to maintain compliance, regulatory checks, audits, new document formation and any other legally binding paperwork which is necessary for the company to conduct business in full compliance with all laws and ordinances.
(21) Consultants: Consultants, will act as the primary body ensuring this business is compliant with all federal, state, and local regulations. Additionally, consultants will help business owners to improve practices for operating a business and provide necessary advice to help ensure success.

(22) CPA: CPA will have complete oversight into all financial transactions for the business and be responsible for documenting and submitting any and all federal and state taxes on a yearly basis. The CPA will also assist in financial planning, investments, mergers, acquisitions, consulting, objective advice and assistance in both financial and strategic areas.

(A) Employees' Annual Compensation: Compensation refers to all forms of pay and rewards received by employees for performance in their jobs, including all forms of cash, benefits, services and perks. The provisioning center will strive to hire 100% of local residents whom will be paid above 150% of Michigan minimum state wage. The current minimum wage in Michigan is $8.90/hour. Households in Lansing, MI have a median annual income of $27,679, which is less than the median annual income in the United States. One hundred percent of our employees will be paid at $15 an hour or above. The importance of compensation will promote the attraction, retention and development of quality people. The total amount and type of compensation for the provisioning center is $676,145, not including those companies and individuals that have a 3rd party rate. Compensation is given in financial rewards that are either direct or indirect:

(1) Direct compensation:

a) Wages and salaries.

b) Starting pay rate far above minimum wage.

c) Raises each a year based on work performance.

d) Incentives.

e) Bonuses and commissions.

f) Tuition reimbursement.
(2) Indirect compensation:

(a) Workers Compensation.

(b) Health benefits.

(c) Vacation pay.

(d) Sick pay.

(e) Holiday pay.

(f) Promotion from within based on work performance.

(3) Pay scale table:

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Director of Operations</td>
<td>$54,163</td>
</tr>
<tr>
<td>Director of Security</td>
<td>$54,163</td>
</tr>
<tr>
<td>General Manager</td>
<td>$54,163</td>
</tr>
<tr>
<td>Provisioning Center Manager</td>
<td>$43,326</td>
</tr>
<tr>
<td>Director of Communications</td>
<td>$32,490</td>
</tr>
<tr>
<td>Medicine Tender</td>
<td>$31,200</td>
</tr>
<tr>
<td>Security</td>
<td>$37,440</td>
</tr>
<tr>
<td>Patient Services and Education Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Quality Assurance Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Inventory Control Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Community Outreach Coordinator</td>
<td>$31,200</td>
</tr>
<tr>
<td>Patient Advocacy Representative</td>
<td>$31,200</td>
</tr>
<tr>
<td>Bookkeeper</td>
<td>$52,000</td>
</tr>
<tr>
<td>Receptionian</td>
<td>$31,200</td>
</tr>
<tr>
<td>Secure Transportation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Sanitation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Laboratory Testing</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Legal Counsel</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Consultants</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>CPA</td>
<td>Based on 3rd party rate</td>
</tr>
</tbody>
</table>
(B) **Veterans Hiring Program:** The provisioning center's veteran's hiring program will recruit, retain, and employ veterans. Veterans and returning service members bring unique skills set and experiences to the civilian workforce. Because of the training, work ethic and goal-oriented culture of the military, veterans not only make excellent employees, but also tend to have a higher rate of retention. Veterans bring with them the skills to do the job, in a timely and efficient manner. These skills such as leadership, management, teamwork, accountability and responsibility are qualities that can benefit our productivity.

(1) **Recruit:** The provisioning center will establish our job application process as Veteran-friendly. We will consider military service as a part of an applicant's work history during the hiring process. Military service is an important part of an applicant's background and can be a strong predictor of his or her ability to receive and respond to supervision and training. Leadership skills and leadership potential are also indicative of an applicant who has successfully completed his or her military obligation. We will request and utilize the DD214 as proof of service completion and hire without judgement. We will utilize the Military Occupational Classification code by entering at this code into the U.S. Department of Labor's Occupational Information Network (O*NET) to locate a civilian equivalent job title.

(a) Our website will mention recruiting materials that our organization values the service Veterans and their family members have given to our country and that we support the hiring of returning service members and military spouses.

(i) On the "careers" portion of our website, we will include the following statements: If you are a Veteran and would like assistance with the employment process at The Provisioning Center, please contact us at vetjobs@ourprovisioningcenter.com.

(ii) If you are a Veteran and would like assistance with the employment process please RSVP and save the date to join our monthly Veterans Hiring Program every first Friday of each month.

(iii) We will actively recruit Veterans, Wounded Warriors and military by finding Veterans and Instituting strategies to help Veterans connect with us. We will access credible resources to help locate qualified, local Veterans and wounded warriors who are seeking employment.

(2) **Retain:** We will promote within the workplace to retain our veteran employees. Retaining a skilled workforce requires effort after the hire, retaining a veteran in the civilian workforce is not all that different than retaining other top talent. We will
ensure our Veteran’s know and feel they are appreciated, respected and worthwhile to our team.

(a) We will place a value on military service. We will develop and promote peer mentorships in the workplace. We will practice public Veterans appreciation and promote a Veteran-friendly workplace. We recognize that military families may have different needs than civilian families and understand our responsibilities under USERRA.

(3) Employ: We will hire qualified, local Veterans and will accommodate Wounded Warriors. We understand our responsibilities under the Americans with Disabilities Act (ADA). We will network with these three organizations to create out Veteran employee recruitment pool.

(a) National Network Organization for Veterans, Community Service/Non-Profit, 1832 Briarwood Drive, Lansing, MI 48917, Phone number (517) 749-8735.

(b) Michigan Workforce Development Agency, Victor Office Center, 201 N. Washington Square, Lansing, MI 48913, Phone: 517-335-5858.


(i) Veterans will be referred to post their resume at the MiTalent website.

(C) Ancillary Economic Anchor: The provisioning center will hire local contractors, cleaning companies, waste disposal companies and will acquire medical marihuana from cultivators located in Lansing to help stimulate the local economy. The marihuana industry is growing at such a fast pace and there are untold job opportunities related to medical marihuana. Some of these positions include promotion, photography, creative design, brand ambassador, reviewers, media and more. There are plenty of great opportunities. Marihuana business is just like a regular business. Specialty companies will be needed to ship, test, market, enforce, track, insure, construct, lobby, inspect in the medical marihuana industry. The need for marketing, accounting, sales, logistics and management positions are necessary.

(1) This list is composed primarily of common business categories that have decided to target the medical marihuana industry:

(a) Advertising.
(b) Compliance.

(i) Cleaning companies.

(ii) Contractors.

(iii) Waste Disposal Companies.

(c) Consulting.

(i) Technical Writers.

(d) Cultivation Products & Services.

(i) Nurseries.

(ii) Lighting equipment.

(iii) Ventilation equipment.

(iv) Pest Control.

(v) Culinary services.

(e) Extraction equipment.

(f) Lab Testing Services.

(g) Legal Professionals.

(i) Lawyers.

(h) IT/Software Professionals.

(i) Software Development.

(i) Media/Publishing/Events.

(i) Promotion.

(ii) Photography.
(iii) Graphic Design.

(iv) Creative Design.

(v) Review Writers.

(j) Marketing professionals.

(l) Digital Marketing.

(ii) Brand ambassador.

(k) Packaging.

(l) Payroll.

(m) Accounting.

(n) Staffing.

(o) Security professionals.

(p) Tourism.

(D) Worker Training Program and Promoting From Within The Company: The provisioning center team will be trained to represent the quality medicine and the outstanding service we provide. Worker training is essential for specific purposes related to the marijuana industry. There will be a worker training program that develops employees toward advancement in long-term career goals within our provisioning center. Learning and upgrading employee skills becomes successive as our employees grow but the long-term gains associated with employee training make a huge retention difference. The short-term expense of a worker training program ensures keeping qualified and productive workers who will share their knowledge with new hires. Here are some of the development initiatives:

(1) Recruit & Hire: The first step is hiring the right people for the right position. We are passionate about hiring veterans, they already come with a skills set learned while in military service. The hiring process identifies the job equivalent of the veterans who are the best fit employees for the provisioning center. The recruitment process is designed educate these veterans to move up within the legal marijuana industry.
The provisioning center is eager to invest in a long-term relationship with the veteran community to gain access to their unique skill sets.

(2) Provide Worker Training: The worker training program begins at the start of employment. We value the time educating the new hires about the marihuana industry, the various processes involved, and the medical marihuana culture. New workers will be introduced to core tasks early and will learn through experience.

(a) Training helps our business run better. Trained employees will be better equipped to handle customer inquiries, make a sale or use computer systems. Training is a recruiting tool. Today's young workers want more than a paycheck. They are geared toward seeking employment that allows them to learn new skills. You are more likely to attract and keep good employees if you can offer development opportunities.

(b) Training promotes job satisfaction. Nurturing employees to develop more rounded skill sets will help them contribute to the company. The more engaged and involved they are in working for our success, the better our rewards. Training is a retention tool, instilling loyalty and commitment from good workers. Staff looking for the next challenge will be more likely to stay if you offer ways for them to learn and grow while at our company. Don't give them a reason to move on by letting them stagnate once they've mastered initial tasks.

(c) Training adds flexibility and efficiency because we can easily cross-train employees to be capable in more than one aspect of the business. Teach them to be competent in sales, customer service, administration and operations. This will help keep them interested and will be enormously helpful when setting schedules or filling in for absences. Cross-training also fosters team spirit, as employees appreciate the challenges faced by co-workers.

(d) Training is essential for knowledge transfer. It's very important to share knowledge among our staff. If only one person has special skills, we'll have a tough time recouping their knowledge if they suddenly leave the company. We will spread knowledge around like diversifying our investments. Training gives seasonal workers a reason to return. Instead of hiring someone new, we offer our employees a chance to learn new skills and benefit from their experience with a possible promotion.

(3) Offer Continuous Learning & Development: The marihuana industry is becoming increasingly sophisticated both technical and medical, medicine tenders will need to ensure they are educated with the latest strains available and research on
marihuana. We aim not only invest in our knowledge capital for our company, but to increase loyalty through this investment in education too. The tasks that are assigned to each employee is intentional. We aim to monitor the frequency of tasks, hours involved, and productivity.

(4) Recognize Retention & Promote: Remember, if you help them grow their careers, they'll help you grow your business. Everyone likes to have a sense of ownership of their work and to have that feeling that they are contributing to the company. Medicine tenders who aspire to dedicate their careers to the legal marihuana industry will likely be looking to progress in their jobs and learn over time. We will give them opportunities to step up to take leadership or ownership over certain tasks. Where we can, give as much autonomy to our medicine tenders on their projects to work towards a results-driven culture. As we seek to engage our employees through the training offered, education available, and a variety of tasks at hand we take some time to understand our employees' career goals. While many love their work as medicine tenders, some may aspire to move up in the field or expand their involvement in the business. Nurture those dreams, and recognize talent early. Act as a mentor and show them some of the real challenges involved in ownership. We will promote from within when we can. We care about our employees' careers as much as they do. Job performance, Reliability, Dependability, Punctuality, Frequency of missed days, Performance under stress, Ability to lead and ability to follow company guidelines are all factor when developing and considering an employee promotion. We offer an extensive training program, where new hires are not put onto the floor to help customers until they have completed a 2-week to 4-week training program. This ensures that they are educated on Industry regulations, general marijuana information and have learned what types of products our store has available, along with the process of making each product.
### 1300.5(23) Annual Budget Revenue

#### Monthly Operating Budget

<table>
<thead>
<tr>
<th></th>
<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lease Payment</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Utilities</td>
<td>$300.00</td>
<td>$300.00</td>
<td>$300.00</td>
</tr>
<tr>
<td>Employee Salaries</td>
<td>$25,653.00</td>
<td>$25,653.00</td>
<td>$25,653.00</td>
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<tr>
<td>Manager Salaries</td>
<td>$30,692.00</td>
<td>$30,692.00</td>
<td>$30,692.00</td>
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<tr>
<td>Michigan Workmans Comp ($34.80 per $1,000)</td>
<td>$1,960.00</td>
<td>$1,960.00</td>
<td>$1,960.00</td>
</tr>
<tr>
<td>Employment Taxes (4.25% in MI)</td>
<td>$2,394.66</td>
<td>$2,394.66</td>
<td>$2,394.66</td>
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<tr>
<td>Office Supplies</td>
<td>$250.00</td>
<td>$500.00</td>
<td>$500.00</td>
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<tr>
<td>Advertising</td>
<td>$1,000.00</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
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<tr>
<td>Insurance</td>
<td>$392.18</td>
<td>$392.18</td>
<td>$392.18</td>
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<tr>
<td>Security Monitoring</td>
<td>$80.00</td>
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#### Cost of Goods

<table>
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<tr>
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<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Average 23.5 lbs per month @ $1,000</td>
<td>$23,500.00</td>
<td>$47,000.00</td>
<td>$94,000.00</td>
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<tr>
<td>Internet</td>
<td>$200.00</td>
<td>$200.00</td>
<td>$200.00</td>
</tr>
<tr>
<td>Patient Services</td>
<td>$500.00</td>
<td>$750.00</td>
<td>$1,000.00</td>
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</table>

#### Total Per Month

<table>
<thead>
<tr>
<th></th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Per Month</td>
<td>$89,421.84</td>
<td>$114,921.84</td>
<td>$162,171.84</td>
</tr>
<tr>
<td>Total Per Year</td>
<td>$1,073,062.08</td>
<td>$1,379,062.08</td>
<td>$1,946,062.08</td>
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</table>
# 1300.5(23) Annual Budget Revenue

## Start Up Expense

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Lease Deposit</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Building Lease</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Architect</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Licensing Fee</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Insurance Depo</td>
<td>$1,863.76</td>
</tr>
<tr>
<td>Tenant Improvements</td>
<td>$38,512.00</td>
</tr>
<tr>
<td>Tracking Equipment</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Office Equipment</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Furniture</td>
<td>$4,000.00</td>
</tr>
<tr>
<td>Security Equipment</td>
<td>$24,000.00</td>
</tr>
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</table>

**Total** $88,375.76

## Projected Revenue

<table>
<thead>
<tr>
<th>Item</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Patients Per Day</td>
<td>50</td>
<td>100</td>
<td>200</td>
</tr>
<tr>
<td>Average amount spent per patient</td>
<td>$70.00</td>
<td>$70.00</td>
<td>$70.00</td>
</tr>
<tr>
<td>Average Per Day</td>
<td>$3,500.00</td>
<td>$7,000.00</td>
<td>$14,000.00</td>
</tr>
<tr>
<td>Average Per Week</td>
<td>$24,500.00</td>
<td>$49,000.00</td>
<td>$98,000.00</td>
</tr>
<tr>
<td>Average Per Month</td>
<td>$98,000.00</td>
<td>$196,000.00</td>
<td>$392,000.00</td>
</tr>
<tr>
<td>Average Sales Per Year</td>
<td>$1,176,000.00</td>
<td>$2,352,000.00</td>
<td>$4,704,000.00</td>
</tr>
</tbody>
</table>

**Total Expense Per Year** $1,073,062.08

**Net Profit** $102,937.92

$1,379,062.08

$1,946,062.08

$2,757,937.92
<table>
<thead>
<tr>
<th>Investment</th>
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</thead>
<tbody>
<tr>
<td>6 Months of Operating Expense @$</td>
<td>89,421.84</td>
</tr>
<tr>
<td>Start Up Expense</td>
<td></td>
</tr>
<tr>
<td>Total Investment</td>
<td></td>
</tr>
</tbody>
</table>
EXHIBIT E
BUY AND SELL AGREEMENT
FOR OFFICE, COMMERCIAL, INDUSTRIAL AND MULTI-FAMILY PROPERTY

Office of MARTIN COMMERCIAL PROPERTIES, INC., a Michigan Corporation d/b/a CBRE | MARTIN, REALTOR®, 1111 Michigan Avenue, Suite 500, East Lansing, MI 48823. Phone: (517) 351-2200 Fax: (517) 351-2201

1. PURCHASER’S OFFER. The Undersigned, [Name of Purchaser], hereby offers to buy from SELLER through CBRE | MARTIN, the following property located in the City of Lansing, County of Ingham, State of Michigan, commonly known as: [Property Description]. Subject to existing building and use restrictions, zoning ordinances and easements, if any, of record, and reasonably acceptable to PURCHASER, and all other terms and conditions.

2. PURCHASE PRICE. The purchase price for the Property is Nine Hundred Thousand and 00/100 ($900,000.00) Dollars, subject to performance by SELLER of the closing obligations specified in Section 14 below.

3. TERMS OF PAYMENT. Terms of payment shall be as indicated by “X” below: [Terms indicated: [X] [ ] [ ] [ ] [ ]]

4. NEW MORTGAGE. PURCHASER shall pay the full purchase price to SELLER upon execution and delivery of a warranty deed and contingent upon PURCHASER’s ability to obtain a mortgage. If PURCHASER fails to deliver to SELLER on or before January 5, 2016, proof that PURCHASER has accepted a loan commitment, PURCHASER may terminate this transaction by written notice to SELLER.

5. SURVEY. A new, recertified ALTA x existing survey, showing all easements of record shall be provided by SELLER. Any new or updated survey shall be paid for by PURCHASER.

6. CLOSING ADJUSTMENTS. All adjustments shall be made between the parties as of the close of business on the closing date. PURCHASER shall receive a credit or assume responsibility, as the case may be, for amounts attributable to time periods following the closing date:
   a. Prepaid rent and additional rent (as defined in this section);
   b. Interest of any existing indebtedness assumed by PURCHASER;
   c. Charges for any transferservice contracts assigned to PURCHASER and any additional rent that is collected by SELLER after closing attributable to the period of time when possession was held.

7. SPECIAL ASSESSMENTS/TAXES/FEES. Special assessments which are or become a lien on the Property on or before the date of closing of this Agreement shall be paid by SELLER or before Closing. All existing deferred special assessments which will become a lien on the Property after the date of closing of this Agreement shall be paid by PURCHASER.

8. TITLE INSURANCE. At SELLER’s expense, SELLER shall provide PURCHASER with a standard ALTA owner's policy of title insurance with standard exceptions in the amount of the purchase price, effective as of the date of closing. The closing shall be held in accordance with the terms of this Agreement.

9. CONVEYANCE. Upon performance by PURCHASER of the closing obligations specified in Section 15 below, SELLER shall convey the Property to PURCHASER by warranty deed, deed of trust, or assignment, as specified in Section 3 above, subject to the lien of any existing encumbrances or any other encumbrances which have been disclosed to PURCHASER and no other third parties.

10. WARRANTIES OF SELLER. Except as otherwise provided or acknowledged in this Agreement, SELLER represents and warrants to PURCHASER as follows:
   a. SELLER’s title to the Property shall be free from liens, encumbrances, and indebtedness of SELLER, unless otherwise specified herein.
   b. Performance of the obligations of SELLER under this Agreement will not violate any contracts, leases, licenses, easements, covenants, restrictions, declarations, covenants, conditions, or agreements which are now or hereafter in effect and binding on the Property, and PURCHASER shall be given written notice of any such obligations.
   c. There is no pending litigation or proceeding pending, or to the SELLER’s knowledge threatened, against or involving the SELLER or Property, and the SELLER does not know of any reason to believe that there is any ground for any such
See below

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

-------- Original Message --------
Subject: RE: [FWD: BONDS RENEWALS AND CERTIFICATES]
From: "Biehler, Deb" <Deb.Biehler@lansingmi.gov>
Date: Tue, March 12, 2019 12:12 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>

Received and under review.

Deb Biehler
Medical Marijuana Specialist
Lansing City Clerk’s Office
124 W. Michigan Avenue | Lansing, MI 48933
O: 517-483-4132 Fax: 517-377-0068
Deb.Biehler@lansingmi.gov
Website | Facebook | Twitter

Chris Swope, CMMC/CMC
From: travis@azpremiermanagement.com <travis@azpremiermanagement.com>
Sent: Friday, March 08, 2019 6:29 PM
To: Biehler, Deb <Deb.Biehler@lansingmi.gov>
Subject: [FWD: BONDS RENEWALS AND CERTIFICATES]

Deb,
Attached are the bond renewals for Wellness Lansing provisioning, cultivation, and manufacturing. Please let me know if these need to be signed somewhere by the licensee as we did not see a location.

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

Premier Management

-------- Original Message --------
Subject: BONDS RENEWALS AND CERTIFICATES
From: "lanetrolns@gmail.com" <agent@agencyinhouse.com>
Date: Fri, March 08, 2019 2:37 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>,
"louie_inc13@yahoo.com" <louie_inc13@yahoo.com>

Good Afternoon,

Thank you for your patience! Please find attached verification certificates in which the insurance company has reinstated the bond. We are providing you a copy of the original bond. Please feel free to call or email with any questions or concerns.

Sincerely,

Mirna Guadron
Mirna Guadron, Broker
L.A. Metro Insurance Services
Southworth All Insurance Agency
35212 Lindero Canyon Rd #304
Westlake Village, CA 91361
Email: lanetrolns@gmail.com
(805) 852-1811 (310) 508-9294
Is the applicant currently a party to any civil lawsuits involving its business practice?

☐ Yes

Has the applicant been a party to any other litigation during the past seven years?

☐ Yes

In the previous ten years, has the applicant been accused of internal misconduct?

☐ Yes

In the previous ten years, has an ultimate decision been issued adverse to the applicant or any of its officers, executives, or managers that would have or could have a current or future effect in the entity?

☐ Yes

If you answered YES to any of the above questions, you are required to complete the following information.

(1) Please provide the following for all litigation related to the supplemental applicant’s business practices, pending or concluded, for the past 7 years. (attach additional pages as necessary)

<table>
<thead>
<tr>
<th>Case Caption</th>
<th>Docket/Case No.</th>
<th>Court</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For any cases that are currently pending, provide the case caption, the cause of action, and a brief explanation regarding the allegations of the case. (add additional pages if necessary)
April 6, 2019

Louie Elias
160 Michelson Road
Rochester Hills, MI 48301

Dear Provisioning Center Applicant,

I have reviewed the report and recommendation of the hearing officer on your appeal of the Scoring and Ranking denial of your application to operate a Medical Marihuana Provisioning Center in the City of Lansing at 815 W Edgewood Blvd Suites E & F.

No additional points were added in the section entitled “Content and Sufficiency”. Every applicant that received a letter to cure a deficiency had a point deducted from this section. Your score remains at 80. I have determined your appeal is denied.

You have the right to appeal this denial of licensure to the Medical Marihuana Commission within thirty (30) days of the date of this letter by filing a written statement to the Commission with the City Clerk’s Office. The Medical Marihuana Commission Appeal will become a matter of public record. The Commission’s review of an appeal shall not be de novo. The Commission shall only overturn, or modify, a decision or finding of the Clerk if it finds such decision or finding to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole record considered by the Clerk in arriving at such decision or finding.

Should you choose to appeal to the Medical Marihuana Commission, your tentative appeal hearing date will be Friday, May 17, 2019 in the Clerk’s Office Training Room located at 2500 S Washington Avenue.

Chapter 1300 provides that should the applicant not receive a license, one-half the application fee shall be returned. This refund will be processed after all appeals are exhausted.

If you have begun business operations pursuant to State Emergency Rule 19 and Executive Order 2017-02, you must cease operations. Operations may resume only if your appeal is granted and the requirements of the temporary operation are satisfied.

Sincerely,

Chris Swope, CMMC
City Clerk

cc: M. Yankowski, Lansing Police Chief
J. Smiertka, Lansing City Attorney
Medical Marijuana Provisioning Center Application - 3208 MLK Inc.
City Clerk Summary of Key Findings

- Appeal was reviewed for accuracy.
- Appeal and exhibits were reviewed for any new information provided in an attempt to cure a deficiency.
- Exhibits which were completely removed or redacted are listed below.
- Sections are numbered to correspond with score sheet, and are listed in the order they appear in the appeal.
- Each section appealed needs to be addressed in the recommendation. It is acceptable to list multiple sections together if they are accepted/rejected for the same reasons.

The following exhibits were removed because they weren’t included in the original application and are an attempt to cure on appeal, which is not allowed:

- Exhibit B contains an aerial map, which was not included in the original application
- Exhibit F contains a Loan Proposal to purchase the property, dated December 20, 2017. This was not included in the original application, which was submitted on December 15, 2017.

Category 14 Buffering between residential zoned areas and establishment
(Appellant’s item 1)
See scoring insights.

<table>
<thead>
<tr>
<th>Score</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Radius of 1320 ft (1/4 mile) of the facility does not touch any residential zoning</td>
</tr>
<tr>
<td>4</td>
<td>Radius of 660 ft (1/8 mile) of the facility does not touch any residential zoning</td>
</tr>
<tr>
<td>3</td>
<td>Residential zoning does not touch the property line of the med marijuana establishment</td>
</tr>
<tr>
<td>2</td>
<td>Residential Zoning on one side of the property line.</td>
</tr>
<tr>
<td>1</td>
<td>Residential Zoning on 2 or more side of the property line.</td>
</tr>
<tr>
<td>0</td>
<td>Residential Zoning on 3 or more side of the property line.</td>
</tr>
</tbody>
</table>

Category 2 Tangible Capital Investment (Appellant’s item 2)
See scoring insights.

3. Job Creation (Integrated System) Overall Number of Jobs Created
See scoring insights.
Category 4 Financial Structure and Financing (Appellant’s Item 4)
Exhibit F referenced by appellant was not included in original application and is an attempt to
cure on appeal. In fact, the document submitted with the appeal is dated December 20, 2017,
five days after appellant submitted application.
See scoring insights. CPA Attestation referenced “does not express an opinion or any other
form of assurance.”

Category 11 Sufficient Financial Resources (Appellant’s Item 5)
Exhibit F referenced by appellant was not included in original application and is an attempt to
cure on appeal. In fact, the document submitted with the appeal is dated December 20, 2017,
five days after appellant submitted application.

Category 13 Content and Sufficiency of Information, Et al (Appellant’s Item 6)
See scoring insights

Category 24 Litigation History (Appellant Item 7)
See scoring insights.
CITY OF LANSING
HEARING OFFICER
DECISION RECOMMENDATION

In Re:

Louie Elias d/b/a Wellness Lansing, LLC
Proposed Location: 815 W. Edgewood Blvd. Ste. E & F

Provisioning Center License Denial

This decision is remitted to the Clerk of the City of Lansing by Hearing Officer, Hilary M. Barnard, Esq., having been read and informed on the issues recommends that in regard to Louie Elias d/b/a Wellness Lansing, LLC and its license application for a Medical Marihuana Provisioning Center that the license application remain denied.

FACTS

Louie Elias d/b/a Wellness Lansing, LLC ("Appellant") applied to the City of Lansing to operate a Medical Marihuana Provisioning Center within the city limits. This recommendation follows a timely appeal from Appellant.

By letter dated March 14, 2019, Appellant was informed that its license application was denied because of its score and rank, having received a score of 80 out of 100. Appellant was informed that this score eliminated the possibility of scoring in the top twenty applicants and that it would not be receiving a provisioning center license. Appellant was also informed that it had the right to appeal the denial within 14 (fourteen) days of the letter's date by written statement with grounds for appeal. With the letter, Appellant was provided a copy of the City of Lansing Provisioning Center Ranking sheet for its business. On the document, Appellant is able to view the total possible points, its attained points, and short insight statements.

Appellant has point deficiencies in several categories.

Appellant's Position

Appellant disputes the denial. Appellant provides several arguments and exhibits to support its appeal. Appellant also provided additional documentation not in its original application.

City Clerk Position

The City Clerk affirms its position on the denial. The City Clerk further iterates that additional information was provided in an attempt to cure on appeal and that information is not to be considered.
APPLICABLE LAW & REASONING

The issue is whether Appellant’s Provisioning Center License Application for the City of Lansing was erroneously scored and denied.

In regard to the issuance of licenses and the appellate process for a license:

“The City Council shall provide, by ordinance, a procedure for the issuance of licenses and permits. The ordinance shall, to the greatest extent possible, place the responsibility for the issuance of licenses and permits under one official in order that persons requesting specific licenses and permits will not have to contact more than one City office.”

At the denial of a license under City of Lansing Ordinance No. 1217, an applicant:

May appeal to the city clerk, who shall appoint a hearing officer to hear and evaluate the appeal and make a recommendation to the clerk. Such appeal shall be taken by filing with the city clerk, within 14 days after notice of the action complained of has been mailed to the applicant's last known address on the records of the city clerk, a written statement setting forth fully the grounds for the appeal. The clerk shall review the report and recommendation of the hearing officer and make a decision on the matter. The clerk’s decision may be further appealed to the commission if applied for in writing to the commission no later than thirty (30) days from the clerk’s decision.²

* * *

[The] review of an appeal shall not be de novo. The commission shall only overturn, or modify, a decision or finding of the clerk if it finds such decision or finding to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole record considered by the clerk in arriving at such decision or finding.³

The arbitrary or capricious standard of review is the commission’s review and is adopted by this Hearing Officer. Arbitrary and capricious have generally accepted meanings.³ Arbitrary is "without adequate determining principle . . . [f]ixed or arrived at through an exercise of will or by caprice, without consideration or adjustment with reference to principles, circumstances, or significance, . . . decisive but unreasoned."⁴ Capricious is "apt to change suddenly; freakish;

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¹ See LANSING CITY CLERK’S OFFICE, City of Lansing City Charter (as amended) at 24 (2013) available at: https://www.lansingmi.gov/DocumentCenter/View/2126/City-Charter?bidId=. In this instance, the license issuance is handled with the City Clerk’s office.
² City of Lansing Ordinance No. 1217 Sec. 1300.15(C).
³ Id. at 1300.3(E).
⁴ There is an inherent binary in license issuance: issued or denied, not a spectrum of decisions. Given that this is a licensing situation, and that the only prescribed review under Ordinance No. 1217 is arbitrary and capricious, that is the standard that will be observed here.
⁶ Id.
whimsical; humorous.\textsuperscript{7} The burden is on the party attacking to affirmatively prove the arbitrary and unreasonable decision.\textsuperscript{8} This is not to say that a local body may “abrogate constitutional restraints.”\textsuperscript{9}

As to whether an applicant can submit supplemental materials on appeal, the Lansing Ordinance in Section 1300.5(B) states that “[a] complete application for a license or licenses required by this chapter shall be made under oath on forms provided by the city clerk and \textit{shall contain all of the following[,]}” (emphasis added). The ordinance then enumerates all the documents and information required for application submission. Per Michigan Court rule, appeals are based on the record already in place.\textsuperscript{10} Further, an appellate body will generally not consider issues not raised in or ruled on by a lower review.\textsuperscript{11} The appellate review is limited to the record before the lower court at the time of the relevant decision.

Under the City of Lansing Ordinance No. 1217 Section 1300.5:

(B)(12)(IV) Planned tangible capital investment in the city, including detail related to the number and nature of applicant’s proposed medical marihuana establishments in the city and whether the locations of such establishments will be owned or leased; further, if multiple licenses are proposed, an explanation of the economic benefits to the city and job creation, if any, to be achieved through the award of such multiple licenses. \textit{Supporting factual data shall be included with the response to this subsection[,]} (emphasis added)

Under the City of Lansing Ordinance No. 1217 Section 1300.6, review of an application will consider:

(D) In the event that there are more applicants for provisioning center licenses who meet the minimum requirements set forth in 1300.6(B) than there are licenses available in either phase one or two, the top scoring twenty (20) applicants in phase one and top scoring five (5) applicants in phase two, shall be eligible to receive provisioning center licenses in accordance with the assessment, evaluation, scoring, and ranking procedures established in this chapter.[.]

The Lansing Ordinance incorporates provisions and definitions of the Medical Marihuana Facilities Licensing Act, 2016 PA 281 (as amended) (“MMFLA”) so as to:

“not limit an individual’s or entity’s rights under the [Michigan Medical Marihuana Act (MMMA)], MMA or the [Michigan Tracking Act (MTA)]” and

\textsuperscript{7} \textit{Id.}
\textsuperscript{9} \textit{Id.} at 162.
\textsuperscript{10} \textit{See e.g.}, MCR 7.105(B)(4); (9)(d) (requiring that the appellate court receive a certified copy of a case’s record and stating review of a trial court’s decision was for legitimate reason based on “arguable support in the record[,]”)
drafters intended that "these acts supersede [the] ordinance where there is a conflict."12

A Lansing applicant must then comply with the MMFLA.13 Pursuant to Sec. 402 of the MMFLA, in evaluating an applicant for licensure, an applicant's history of "noncompliance with any regulatory requirements in this state or any other jurisdiction" will be considered.14

Here, this Hearing Officer will decline to review any supplemental materials provided by Appellant in effort to cure application deficiencies. Per requirements in the Lansing Ordinance in Section 1300.5(B) and general state appellate practice, review on appeal is to the record originally provided and reviewed. See e.g., Napier v. Jacobs, 429 Mich. 222, 232-35 (1987).15 Thus, this review will address the appeal on Appellant's first basis and the application as originally provided.

Addressing arguments under Buffering, Appellants has residential zoning three or more sides of its property line. The buffering tool by the city merits a score of "0" for this. Appellant argues that the decision must have been made based on proximity to commercial zoning. This is not what is articulated in the scoring insights which states "residential zoning on north, south & east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points." Thus, there is no basis for awarding more points in this category.

Tangible Capital is addressed in Appellant's appeal.16 The city defines tangible capital as an asset with a physical form. Thus, only such assets would count in the calculation. On the ranking sheet it appears the deduction is related to a lack of cultivation/processing facility ownership. As part of assessing tangible capital, the city looks to other facilities Appellant might have, but does not consider capital related to other applications/locations further. As such any capital not for this location would not be considered. Appellant points to improvements to another location but does not address capital for this location. Thus, Appellant has not met its burden as to this location and its associated tangible capital to merit more points.

Under Job Creation, Appellant's insights state "Applicant only indicates there will be between 16 and 22 jobs created at the provisioning center and provides details about local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. Lacks an optimal number of jobs." Any jobs pertaining to other locations would not be considered under this application. The Hearing Officer's inquiry in assessing the argument is

12 City of Lansing, Michigan Ordinance No. 1217 Sec. 1300.2(C).
13 Id. at Sec. 1300.2(D).
14 MMFLA, MCL § 333.27402(3)(g).
15 In this case it discusses that an "exception that review is permissible 'to prevent a miscarriage of justice.'" "Most jurisdictions recognize the authority of an appellate court to review an issue, even where the issue was not preserved, when some fundamental error would otherwise result in some egregious result." However, that "such power of review is to be exercised quite sparingly. Napier, 429 Mich. at 233. Under the facts presented, there is not a fundamental error so as to trigger exercising supplementing on appeal.
16 The following statements in the tangible capital paragraph also correspond to Appellant's Sufficient Financial Resources and Financial Structure and Financing arguments. Both of these two categories point to the appeal Exhibit E which is a Buy-Sell agreement. This adds nothing to Appellant's argument because it shows the terms of the mortgage not how the money will be allocated.
"how many jobs will this facility create." Appellant states it has budgeted for both full and part time staff, and that "once up and running the grower and process facilities will also generate additional jobs." Again, the grower and process facilities are not this location and would not be part of this particular application. Appellant provided its job creation plan with its appeal, which has a number of statements that do not give a quantifiable number of jobs. It gives types of jobs and simplistic descriptions but lacks detail and quantifiable numbers. The factfinder is "not permitted to draw its own conclusions from the evidence presented to the administrative body . . . [and] must give deference to an agency's findings of fact." The factfinder may not set aside findings just because other facts in the record could have come to a different conclusion. Thus, there is no basis to award additional points here.

As to Content and Sufficiency, Appellant argues that a point was deducted because of a bond expiration. From the scoring insights, it appears this was the case. Appellant did provide an updated bond document within the time period requested per the emails in Exhibit G. Appellant should be awarded 1 point back in this category.

In Litigation History, Appellant argues it provided all information. The LARA Disclosure form 8-SA would be for the Supplemental applicants, Appellant should have also included Disclosure form 8 for the Applicant itself. However, Appellant was awarded one point back in its Sufficient Financial Resources category for a full litigation history as to stakeholders as stated on the ranking sheet. Thus, no basis to award points in this category as there is only the 8-SA form that Appellant asked to be considered. Appellant has not addressed the issue for the score deduction. "Failure to brief a question on appeal is tantamount to abandoning it." Appellant has abandoned its argument here.

CONCLUSION

For the foregoing reasons, it is recommended that Appellant's application for a provisioning center license remain denied, but allocated points as indicated above.

Respectfully Submitted,

Dated: April 3, 2019

Hilary M. Barnard, Hearing Officer

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18 Id.
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>LOUIE ELIAS</th>
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<tbody>
<tr>
<td>Applicant Address</td>
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<td><strong>1. Marketing, Advertising and Promotion</strong></td>
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<td>4</td>
<td><strong>Scoring Insights</strong></td>
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<td>Applicant provides many marketing, advertising, promotion, and minor minimization examples (e.g., main goal in marketing plan is to reduce exposure of ads to youth; will not advertise in newspapers, no flyer distribution in community; no marijuana symbols on logos; discreet signage; age-restricted website; social media; Weedmaps; Leafly; loyalty rewards program; direct mail; etc.).</td>
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<td><strong>2. Tangible Capital Investment in the City of Lansing</strong></td>
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<td>Applicant indicates they will initially lease the 2,340 sq. ft. provisioning center property at 815 W. Edgewood (3-year contract at $2,145 rent/month. startup cost of $593,790) until license approval is obtained from the City (at which time they will purchase the property for $900K). Also has a 5-year lease ($5K/month rent) for a 5K sq. ft. property at 745 Lake Lansing Rd. This is intended to house both a cultivation operation (1,000 plants under a Class B license) and processing operation in Lansing. Also intends to establish its HQ in Lansing and will develop relationships with other state licensed PCs in Lansing to discuss selling them processed and cultivated products. Lacks cultivation/processing facility ownership and an optimal amount of tangible capital investment.</td>
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<td><strong>3. Job Creation (Integrated System) Overall number of jobs created</strong></td>
<td>5</td>
<td>2</td>
<td>Applicant only indicates there will be between 16 and 22 jobs created at the provisioning center and provides details about local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. Lacks an optimal number of jobs.</td>
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<td><strong>4. Financial Structure and Financing</strong></td>
<td>3</td>
<td>2</td>
<td>Applicant indicates that based on initial forecasted provisioning center startup costs of $88.37K, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth value of $2.28 million (including cash on hand and in banks of $100K) and a deposit account balance statement of $254K, and a 2016 federal tax return showing $160.9K adjusted gross income. Lacks a clear description on how $900 purchase price of the provisioning center will be covered.</td>
</tr>
<tr>
<td><strong>5. Plans to Integrate Facility with Other Establishments</strong></td>
<td>2</td>
<td>2</td>
<td>Applicant indicates they will integrate their provisioning center with their own Class B (1,000 plants) cultivation center to be leased at 745 Lake Lansing Rd.</td>
</tr>
<tr>
<td><strong>6. Charitable Plans and Strategies</strong></td>
<td>4</td>
<td>4</td>
<td>Applicant indicates they plan to contribute yearly donations to the Lansing Public School District based on annual gross sales (with a focus on music and arts programs). They will also conduct volunteer work relating to youth recreation activities and participate in youth drug prevention. Will provide free transportation to veterans, indigent, and ill patients, provide discounted rates to seniors and others, get involved with the adopt-a-highway program, be involved with graffiti remediation (each employee will donate 10 hours/year in volunteer work), etc. Lacks proof of any actual payment or executed agreement. 9/4 UPDATE Applicant provides proof that multiple dollar contributions have been given to both Advent House Ministries and the Greater Lansing Food Bank (totaling $775 in 2017), in addition to their pledge to contribute yearly donations based on annual gross sales. Suggestion: Change score from 3 to 4.</td>
</tr>
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7. Number of Jobs at the Provisioning Center Category Thresholds: 1 = < 6 jobs, insufficient details; 2 = < 6 jobs, sufficient details; 3 = 6 jobs, sufficient details; 4 = > 6 jobs insufficient details; 5 = > 6 jobs, sufficient/good details.

| 5 | 5 | Applicant indicates there will be between 15 and 22 jobs created at the provisioning center. Details: local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. |

8. Amount and Type of Compensation (PC)

| 2 | 2 | Applicant indicates all provisioning center positions (100%) will pay at least $15/hour and provides strong support details. |

9. Percent of Employees Earning At Least $15/Hour (PC)

| 3 | 3 | Applicant indicates all provisioning center employees will earn at least $15/hour. |

10. Projected Annual Budget and Revenue (PC)

| 2 | 2 | Applicant provides detailed projected annual budget and revenue data (e.g., $1.07 million in total expenses and $1.17 million in average sales during year 1) that are understandable. |

11. Sufficient Financial Resources

| 5 | 4 | Applicant does not provide litigation compliance verification forms for all stakeholders. Applicant indicates that based on initial forecasted provisioning center startup costs of $883K, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth value of $2.28 million (including cash on hand and in banks of $100K) and a deposit account balance statement of $254K, and a 2016 federal tax return showing $160K adjusted gross income. Lacks a clear description on how $900K purchase price of the provisioning center will be covered. Additional point awarded for providing full stakeholder litigation history. |

12. Business Experience

| 5 | 5 | Applicant indicates they have 10 years of medical marijuana caregiver facility operational experience, plus decades of other applicable work experience (pharmacy, banking, human resources, property management, real estate). |

13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items

| 5 | 3 | "No Table of Contents, 1 point deducted Updated upon further review 9/27/18 (change in score 1 pointed added) Update 3/14/2019- 1 point deducted for second insurance cure letter sent. Original letter sent 6/13/2018 via email was cured. Second letter sent via email 2/25/2019 due to expiration of bond. No response within 14 days to second letter as requested." |

14. Buffering between residential zoned areas and establishment

| 5 | 0 | Surrounded by other buildings. Updated score using a better measurement tool 9/18/18 residential zoning on north, south & east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points. |

15. Increased traffic on side streets will be scored lower

| 5 | 5 | No issues Updated 9/25/18 high scores in all categories |

16. Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan

| 10 | 10 | Tier 1 5 pts A+Sec Plan. Strong traffic patterns, driveways, parking, and circulation. No traffic issues 5pts |

17. Plan to meet with neighborhood organizations, plan to meet
| 18. Improvements made or proposed to building | 3 | 3 | Inadequate plan updated 9/24/18 using a more accurate measurement tool, $62,512 of planned improvements which is 255% of the SEV of $24,500. |
| 19. Plan to minimize/eliminate traffic | 1 | 1 | Traffic plan included |
| 20. Plan to minimize/eliminate noise | 2 | 2 | Noise buffering fencing. Detailed plan |
| 21. Plan to minimize/eliminate odor | 3 | 3 | Adequate plan sealed, HVAC with air scrubbers and charcoal filtration, staff training, odor tracking system. Score updated 10/22/18 bpj |
| 22. LPD Complaints | 4 | 4 | Dollar General Strip mall - list too large, 89 calls (9+ calls drops score to 1pt, violence/weapons/drugs deducts 1 pt) 12/26/2018 - score increased to 4. Establishment in strip mall and calls not attributable to a specific business. |
| 23. Demo of Regulatory Compliance | 4 | 3 | No tax history updated 9/25/18 trash 1 pt deducted |
| 24. Litigation History | 2 | 1 | All stakeholders have a complete litigation history with no or minimal issue. 11/3/18 LARA form only, not a full history - 1 pt deducted |
| **Total Score** | **100** | **80** | |
CITY OF LANSING

MEDICAL MARIHUANA COMMISSION

In re: License Application of
Louie Elias/Wellness Lansing
815 W Edgewood Blvd., Suite E-F
Lansing, MI 48911

/_________________________
SAULIUS MIKALONIS (P39486)
JEFFREY M. SCHRODER (P63172)
PLUNKETT & COONEY, P.C.
Attorney for Appellant
38505 Woodward Avenue Ste 100
Bloomfield Hills, MI 48304
(248)-594-2796
jschroder@plunkettcooney.com

/_________________________

APPLICANT’S APPEAL BRIEF

NOW COMES the Appellant, by and through its attorneys, PLUNKETT COONEY, P.C.,

by Jeffrey M. Schroder and Saulius Mikalonis, and pursuant to the Lansing Code of

Ordinances § 1300.15(c), files this appeal of the Lansing City Clerk’s denial of a medical

marihuana provisioning center license. This matter, having been also reviewed on a

preliminary appeal by the appointed Hearing Officer, is properly before the Lansing

Medical Marihuana Commission for appeal.
I. PROCEDURAL HISTORY

On March 14, 2019, the Applicant received correspondence from the Lansing City Clerk's office indicating: "The Lansing City Ordinance section 1300.6 discusses Provisioning Center license application evaluation. Your score of 80 out of 100 eliminates the possibility of scoring in the top twenty. Therefore, your application for licensure is denied. The correspondence attached a brief summary of determining factors for each sub-score in 24 separate and numbered categories. (EXHIBIT A, Scoring Insights). On March 27, 2019, the first-level appeal was filed with the Lansing City Clerk's Office (EXHIBIT B, First Appeal). On April 3, 2019, the appointed hearing officer issued a Decision Recommendation, and recommended that one (1) additional point in the category Content and Sufficiency. (EXHIBIT C, Decision Recommendation.) On April 5, 2019, the City Clerk denied the application and declined the recommendation of the hearing officer and did not award the additional point. (EXHIBIT D, Denial Letter.) This matter is now properly before the Medical Marihuana Commission for its final appeal.

II. STANDARD OF REVIEW

The Lansing Code of Ordinances § 1300.03 states in relevant part that: "The Commission shall only overturn, or modify, a decision or finding of the Clerk if it finds such decision or finding to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole record considered by the Clerk in arriving at such decision or finding." As such, the Applicant will show that the scoring in particular categories is, in fact, arbitrary or capricious because of the following: (1) Scoring Insights
are based on clearly erroneous findings; (2) Scoring methods do not comply with the ordinance; and (3) Scoring was an abuse of discretion. The City of Lansing published a document dated November 13, 2017 entitled “Final Medical Marijuana Provisioning Centers Scoring Criteria” as shown in EXHIBIT E. This document shows the maximum points in every category out of a possible 100 points.

III. SCORING METHODS DO NOT COMPLY WITH THE CODE OF ORDINANCES, ARE BASED ON CLEARLY ERRONEOUS FINDINGS, AND ARE AN ABUSE OF DISCRETION.

A. Category 14: Buffering between residential zoned areas and establishment.

EXHIBIT A shows that the applicant was not awarded zero (0) out of 5 possible points in Category 14 for this scoring criterion and the scoring insight states:

Surrounded by other buildings. Updated score using a better measurement tool 9/18/18 residential zoning on north, south & east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points. (EXHIBIT A, p. 2).

The scoring criteria is based upon the Lansing Code of Ordinances at §1300.13 is entitled “Location, buffering, dispersion, and zoning requirements for medical marihuana provisioning centers.” Specifically, the applicant’s location is zoned F-1 Commercial and, as such, a provisioning center is permitted in this zone. Ordinance §1300.13(B). The facility is surrounded by other buildings on the site as the scoring insight claims. However, this is a large commercial building and there is no residential in the building. This scoring category addresses the buffering between “residential zoned areas and establishment.”
There can be no deduction of points for proximity to other commercial uses. There is no basis to deduct points for closeness of the establishment to other commercial uses.

The Lansing Zoning Ordinance defines buffering as “a physical area that separates one land use from another. Such area could be landscaped with plants and could also contain a berm, fence or other screening material.” Ordinance § 1290.01. (EXHIBIT F). This category is not about distances between buildings, but rather about looking at the natural or physical screening between uses. The City Council already adopted an ordinance that governs distances at § 1300.18, requiring a 500-foot distance from certain uses and it does not include residential property. (EXHIBIT G). Although it had the power to do so, the City Council did not create a distance requirement between residually zoned property and provisioning centers. The City Council does require proper buffering between facilities and residential properties, and this proposed facility provides excellent buffering.

The scoring insight states that zero (0) points are awarded due to a measurement tool to determine the distance between the establishment and the residually zoned properties on the north, south, and east sides of the property1. Please see EXHIBIT H, which is a location area map with a satellite view. The establishment is clearly marked with the address of the property and the Google Maps pin. The map shows that there is sufficient buffering between as follows:

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1 The scoring insights in EXHIBIT A state that this “updated score using a better measurement tool.” The city did not disclose the original score, the measurement tools used in each case, nor the actual distances.
• **Residential Area to North marked “A” on Map.** The buffering between the establishment and the area to the North is significant. There is a boulevard with a landscaped median separating the establishment from the residential. Further, there is a significant amount of landscaping and trees on a large piece of property just south of the “A” on the map which provides buffering between the establishment and the residential property. The boulevard and the additional landscaping meet the definition of a buffer under the ordinance.

• **Residential Area to East marked “B” on Map.** The buffering between the establishment and the area to the East must be considered. Please see EXHIBIT I, a close up view. The properties are separated by South Washington Avenue, a major local road. The homes on the East side of Washington Avenue have large trees in front, and they face a grassy landscaped area to the South of the subject building. This grassy landscaped area serves as a buffer, and the residents are not looking out their window and viewing a medical marihuana establishment.

• **Residential Area to South marked “C” on Map.** As EXHIBIT H shows, there is significant buffering between the establishment and the residential property to the south. The first barrier and buffer is Interstate-96, which is one of the state’s largest highways. The highway itself has a large landscaped berm separating the east-west traffic. Further, on either side of the Interstate, there is a long row of trees and landscaping that serves as a buffer between the highway and the properties on both the North and South side of the highway. Finally, the residents to the south are no residents of the city of Lansing. An Interstate Highway is a major “buffer” under any definition.

A review of the zoning ordinance will show that this applicant has met or exceeded any buffer requirement in the zoning ordinance. There is no authority in the ordinance to only use distance as a factor when the City Council has authorized a medical marihuana provisioning center in this zoning classification, and the establishment can show significant natural and physical buffering to separate the residential from the establishment. The **Applicant should receive 5 full points in this category.**
B. Category 13: Content and Sufficiency of Information: Professionalism of submitted Documentation Including Clear Labeling of Items

The scoring insights show that points were deducted "because of letter sent via email 2/25/2019 due to expiration of bond. No response within 14 days to second letter as requested." On 2/25/2019, Deb Biehler of the City Clerk’s office sent email correspondence that stated:

The bond on file for the Provisioning Center located at 815 W Edgewood Drive expired 12/4/18. Please submit a new bond or renewal copy in 14 days from the date of this email. Failure to submit the requested document could result in application denial and will impact your Score and Ranking. Please contact the Clerk’s Office with any questions. /s/ Deb Biehler

EXHIBIT J is an email chain showing that on Friday, March 8, 2019 at 6:29 PM, Mr. Travis Pollock emailed the requested bond renewals to Deb Biehler at her assigned city email address. Ms. Biehler did not respond to this email until Tuesday March 12, 2019 at 12:12 PM and indicated “Received and under review.” The Applicant complied and provided bond renewals within the 14 day period which would have ended at the close of business on Monday, March 11, 2019. The Applicant should not be deducted points because the city did not open the email until the next day.

The appointed Hearings Officer agrees with our position and has recommended an additional point be added in this category. (EXHIBIT C, p. 5). The Hearings Officer concludes: “Appellant did provide an updated bond document within the time period
requested per the emails...Appellant should be awarded 1 point back in this category.” However, the City Clerk refuses to add the additional point because “every applicant that received a letter to cure a deficiency had a point deducted from this section.” (EXHIBIT D). This is arbitrary and capricious and whether or not the City Clerk treated other applicants similarly. If the threat was made to deduct points if applicants did not comply by a deadline, and applicants did comply by the deadline, and points were deducted anyway—this is the very definition of arbitrary. Other applicants have had the opportunity to appeal this arbitrary decision-making, and this should not be binding on this applicant.

C. Category 2: Tangible Capital Investment in the City of Lansing

The applicant is was deducted 6 points because it lacks cultivation/processing facility ownership and an optimal amount of tangible capital investment. The applicant submitted a tangible asset plan (EXHIBIT K) showing that the entity will make improvements to the interiors and exteriors of the subject properties, even improvements to leased space which qualifies as a tangible capital investment. For example, applicant stated “entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing.” Tangible capital investment outlined in the application at the 745 Lake Lansing Road location included the following:

- Improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors
- New exterior lighting will be installed at the facility making the community safer.
- Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.
• Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.
• All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

Whereas the scoring insights show that the reviewer considered the lease of the property at 745 Lake Lansing Road, the tangible capital improvements outlined in the application were not considered. The applicant should be awarded some additional points in this category.

D. **Category 3: Job Creation (Integrated System) Overall Number of Jobs Created.**

Applicant has provided a Job Creation Plan which shows 22 types of projected jobs. (See **EXHIBIT L - Job Creation Plan**). These are job types and not the total number of jobs. There are 16 employee types listed in the pay scale table on page 9 of 15 of the plan. There are 6 additional contractors and professional services agreements. The annual compensation of the 16 employee types for the provisioning center alone is $676,145 as shown on page 8 of 15. The provisioning center will have in excess of 22 actual jobs based on this budgeting. For example, a medicine tender will make $15 per hour. The plan indicates that there will be multiple medicine tenders. A facility could hire 5 full-time medicine tenders or 15 part-time medicine tenders and make it appear that there are additional jobs. This facility has budgeted well over $650,000 per year for wages for both full and part time staff at the provisioning center alone. Once up and running, the grower and process facilities will also generate additional jobs. The applicant has only received 2 out of 5 points in this category,
and should be awarded at least one additional point. The comment “lacks optimal number
of jobs” is not a basis to cut over 50 percent of the available points when great detail was
provided on the types of jobs that will be created.

E. Category 4: Financial Structure and Financing

The applicant lost one point due to the following: “lacks a clear description on how the
$900 (sic) purchase price will be covered.” The application contains a document entitled
“Buy and Sell Agreement” showing that the building will be financed by a mortgage. (See
EXHIBIT M, paragraph 3). The Seller approved these terms and was satisfied that the
buyer could obtain financing and is in receipt of documentation showing that the applicant
has approved financing (EXHIBIT N).

F. Category 11: Sufficient Financial Resources

The applicant was deducted one point for “lacking a clear description on how the $900K
purchase price of the provisioning center” will be covered. Please see the item entitled
“Financial Structure and Financing” in paragraph 4 above which shows that the building
will be financed by a mortgage and the seller was satisfied. This point should be awarded.

G. Category 24: Litigation History

EXHIBIT A shows that these two points are for “business litigation history.” One point
was deducted because applicant filed a LARA form to show litigation history. The point was
deducted because this is “not a full history.” Although the LARA disclosures only requests
litigation history going back 7 years, this is a full litigation history for this applicant. Louie
Elias had no business litigation history, ever. The business litigation history for applicant Wellness Lansing, LLC is complete; the entity was formed on June 22, 2018 as shown by the entity’s Articles of Organization. (EXHIBIT O). The entity’s Articles of Organization were also disclosed with the application. Therefore, a litigation history disclosure that shows seven (7) years of litigation history is a complete history for an entity that was only in existence for six (6) months at the time of the application. The relevant ordinance section at 1300.6(B)(4) requires consideration of whether the applicant has a record of various detrimental acts prior to the application. The applicant has not been in litigation and did not fail to disclose any prior litigation, and the disclosure is complete.

IV. CONCLUSION

Based on the foregoing, the Applicant respectfully requests that the Medical Marihuana Commission modify the score awarded to the Applicant in the applicable categories.

Respectfully submitted,

Plunkett Cooney

By: /s/ Jeffrey M. Schroder
Saulius Mikalonis (P39486)
Jeffrey M. Schroder (P63172)
Attorney for Petitioner
38505 Woodward Ave – Suite 100
Bloomfield Hills, MI 48304
(248) 594-2796

Dated: May 3, 2019
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<td>3. Job Creation (Integrated System) Overall number of jobs created</td>
<td>5</td>
<td>Applicant only indicates there will be between 16 and 22 jobs created at the provisioning center and provides details about local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. Lacks an optimal number of jobs.</td>
<td></td>
</tr>
<tr>
<td>4. Financial Structure and Financing</td>
<td>3</td>
<td>Applicant indicates that based on initial forecasted provisioning center startup costs of $88.37K, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth of $2.28 million (including cash on hand and in banks of $100K) and a deposit account balance statement of $254K, and a 2016 federal tax return showing $160.5K adjusted gross income. Lacks a clear description on how $900 purchase price of the provisioning center will be covered.</td>
<td></td>
</tr>
<tr>
<td>5. Plans to Integrate Facility with Other Establishments</td>
<td>2</td>
<td>Applicant indicates they will integrate their provisioning center with their own Class B (1,000 plants) cultivation center to be leased at 745 Lake Lansing Rd.</td>
<td></td>
</tr>
<tr>
<td>6. Charitable Plans and Strategies</td>
<td>4</td>
<td>Applicant indicates they plan to contribute yearly donations to the Lansing Public School District based on annual gross sales (with a focus on music and arts programs). They will also conduct volunteer work relating to youth recreation activities and participate in youth drug prevention. Will provide free transportation to veterans, indigent, and ill patients, provide discounted rates to seniors and others, get involved with the adopt-a-highway program, be involved with graffiti remediation (each employee will donate 10 hours/year in volunteer work), etc. Lacks proof of any actual payment or executed agreement. 9/4 UPDATE Applicant provides proof that multiple dollar contributions have been given to both Advent House Ministries and the Greater Lansing Food Bank (totaling $775 in 2017), in addition to their pledge to contribute yearly donations based on annual gross sales. Suggestion: Change score from 3 to 4.</td>
<td></td>
</tr>
<tr>
<td>Category</td>
<td>Criteria</td>
<td>Score</td>
<td></td>
</tr>
<tr>
<td>----------</td>
<td>----------</td>
<td>-------</td>
<td></td>
</tr>
<tr>
<td>7. Number of Jobs at the Provisioning Center Category Thresholds:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 = &lt; 6 jobs, insufficient details;</td>
<td>3</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>2 = &lt; 6 jobs, sufficient details;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 = 6 jobs, sufficient details;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 = &gt; 6 jobs, insufficient details;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 = &gt; 6 jobs, sufficient/good details.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Amount and Type of Compensation (PC)</td>
<td>2</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Applicant indicates all provisioning center positions (100%) will pay at least $15/hour and provides strong support details.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Percent of Employees Earning At Least $15/Hour) (PC)</td>
<td>3</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Applicant indicates all provisioning center employees will earn at least $15/hour.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Applicant provides detailed projected annual budget and revenue data (e.g., $1.07 million in total expenses and $1.17 million in average sales during year 1) that are understandable.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
<td>5</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Applicant does not provide litigation compliance verification forms for all stakeholders. Applicant indicates that based on initial forecasted provisioning center startup costs of $88.3k, they have adequate funding to begin operations and meet the capitalization requirements. Provides CPA-attested net worth value of $2.28 million (including cash on hand and in banks of $100k) and a deposit account balance statement of $254k, and a 2016 federal tax return showing $160.3k adjusted gross income. Lacks a clear description on how $900K purchase price of the provisioning center will be covered. Additional point awarded for providing full stakeholder litigation history</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Business Experience</td>
<td>5</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Applicant indicates they have 10 years of medical marijuana caregiver facility operational experience, plus decades of other applicable work experience (pharmacy, banking, human resources, property management, real estate).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
<td>3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>&quot;No Table of Contents. 1 point deducted. Updated upon further review 9/27/18 (change in score 1 pointed added) Update 3/14/2019 - 1 point deducted for second insurance cure letter sent. Original letter sent 6/13/2018 via email was cured. Second letter sent via email 2/25/2019 due to expiration of bond. No response within 14 days to second letter as requested. &quot;</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
<td>0</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surrounded by other buildings. Updated score using a better measurement tool 9/18/18 residential zoning north, south &amp; east (3) sides of the property which is scored with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>No issues. Updated 9/25/18. High scores in all categories</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16. Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</td>
<td>10</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Tier 1.5 pts A+Sec Plan. Strong traffic patterns, driveways, parking, and circulation. No traffic issues pts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations,</td>
<td>1</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>plan to meet</td>
<td></td>
<td></td>
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<td>---</td>
</tr>
<tr>
<td><strong>18. Improvements made or proposed to building</strong></td>
<td>3</td>
<td>3</td>
<td>inadequate plan updated 9/24/18 using a more accurate measurement tool, $62,312 of planned improvements which is 255% of the SEY of $24,500.</td>
</tr>
<tr>
<td><strong>19. Plan to minimize/eliminate traffic</strong></td>
<td>1</td>
<td>1</td>
<td>traffic plan included</td>
</tr>
<tr>
<td><strong>20. Plan to minimize/eliminate noise</strong></td>
<td>2</td>
<td>2</td>
<td>noise buffering fencing Detailed plan</td>
</tr>
<tr>
<td><strong>21. Plan to minimize/eliminate odor</strong></td>
<td>3</td>
<td>3</td>
<td>Adequate plan sealed, HVAC with air scrubbers and charcoal filtration, staff training, odor tracking system. Score updated 10/22/18 bp1</td>
</tr>
<tr>
<td><strong>22. LPD Complaints</strong></td>
<td>4</td>
<td>4</td>
<td>Dollar General Strip mall - list too large, 89 calls (9 calls drops score to 1pt, violence/weapons/drugs deducts 1 pt) 12/26/2018 - score increased to 4. Establishment in a strip mall and calls not attributable to a specific business.</td>
</tr>
<tr>
<td><strong>23. Demo of Regulatory Compliance</strong></td>
<td>3</td>
<td>4</td>
<td>no tax history Updated 9/25/18 trash 1 pt deducted</td>
</tr>
<tr>
<td><strong>24. Litigation History</strong></td>
<td>2</td>
<td>1</td>
<td>All stakeholders have a complete litigation history with no or minimal issue. 11/26/18 LARA form only, not a full history - 1 pt deducted</td>
</tr>
<tr>
<td><strong>Total Score</strong></td>
<td>100</td>
<td>80</td>
<td></td>
</tr>
</tbody>
</table>
EXHIBIT B
March 27, 2019

VIA UPS NEXT DAY AIR AND
EMAIL. at clerk@lansingmi.gov

Clerk Chris Swope
Lansing City Clerk’s Office
Ninth Floor, City Hall
124 W Michigan Ave
Lansing, MI 48933-1695

RE: Appeal to Medical Marihuana Commission of Denial of Medical
Marihuana Provisioning Center Applicant Louie Elias/Wellness Lansing
located at 815 W Edgewood Blvd., Suite E-F

Dear Clerk Swope:

This Appeal is submitted pursuant to Lansing City Ordinance No. 1217 § 1300.15(e) on
behalf of Medical Marihuana Provisioning Center Applicant Louie Elias operating as
Wellness Lansing. The basis for this appeal is threefold: (1) Scoring Insights are based on
clearly erroneous findings; (2) Scoring methods do not comply with the ordinance; and (3)
Scoring was an abuse of discretion. Below is the detailed basis for this appeal.

1. Buffering between residential zoned areas and establishment.

The applicant was not awarded aero (0) out of 5 possible points and the scoring insight states:

Surrounded by other buildings. Updated score using a better measurement
tool 9/18/18 residential zoning on north, south & east (3) sides of the
property which is score with zero points and falls short of the optimal
distance of 1/4 mile (1320 feet) to receive full points.

The ordinance at §1300.13 is entitled “Location, buffering, dispersion, and zoning
requirements for medical marihuana provisioning centers.” Specifically, the applicant’s
location is zoned F-1 Commercial and, as such, a provisioning center is permitted in this
zone. Ordinance §1300.13(B). The facility is surrounded by other buildings on the site as
the scoring insight claims. However, this is a large commercial building and there is no
residential in the building. This scoring category is with respect to buffering between
“residential zoned areas and establishment.” There can be no deduction of points for
proximity to other commercial uses. There is no basis to deduct points for closeness of the establishment to other commercial uses.

The Lansing Zoning Ordinance defines buffering as “a physical area that separates one land use from another. Such area could be landscaped with plants and could also contain a berm, fence or other screening material.” Sec. 1290.01 (Definitions). Therefore, this is not just about measuring a distance but looking at the natural or physical screening between the uses.

The scoring insight states that zero (0) points are awarded due to a measurement tool to determine the distance between the establishment and the residentially zoned properties on the north, south, and east sides of the property. Please see Attached EXHIBIT A, which is a location area map with a satellite view. The establishment is clearly marked with the address of the property and the Google Maps pin. The map shows that there is sufficient buffering between as follows:

- **Residential Area to North marked “A” on Map.** The buffering between the establishment and the area to the North is significant. There is a boulevard with a landscaped median separating the establishment from the residential. Further, there is a significant amount of landscaping and trees on a large piece of property just south of the “A” on the map which provides buffering between the establishment and the residential property.

- **Residential Area to East marked “B” on Map.** The buffering between the establishment and the area to the East must be considered. Please see EXHIBIT B, a close up view. The properties are separated by South Washington Avenue, a major local road. The homes on the East side of Washington Avenue have large trees in front, and they face a grassy landscaped area to the South of the subject building. This grassy landscaped area serves as a buffer, and the residents are not looking out their window and viewing a medical marihuana establishment.

- **Residential Area to South marked “C” on Map.** As EXHIBIT A shows, there is significant buffering between the establishment and the residential property to the south. The first barrier and buffer is Interstate-96, which is one of the state’s largest highways. The highway itself has a large landscaped berm separating the east-west traffic. Further, on either side of the Interstate, there is a long row of trees and landscaping that serves as a buffer between the highway and the properties on both the North and South side of the highway. Finally, the residents to the south are no residents of the city of Lansing.

A review of the zoning ordinance will show that this applicant has met or exceeded any buffer requirement in the zoning ordinance. There is no authority in the ordinance to only use distance as a factor when the City Council has authorized a medical marihuana
provisioning center in this zoning classification, and the establishment can show significant natural and physical buffering to separate the residential from the establishment. The Applicant should receive 5 full points in this category.

2. Tangible Capital Investment in the City of Lansing

The applicant is was deducted 6 points because it lacks cultivation/processing facility ownership and an optimal amount of tangible capital investment. The applicant submitted a tangible asset plan (EXHIBIT C) showing that the entity will make improvements to the interiors and exteriors of the subject properties, even improvements to leased space which qualifies as a tangible capital investment. For example, applicant stated "entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing." Tangible capital investment outlined in the application at the 745 Lake Lansing Road location included the following:

- Improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors
- New exterior lighting will be installed at the facility making the community safer.
- Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.
- Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.
- All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

Whereas the scoring insights show that the reviewer considered the lease of the property at 745 Lake Lansing Road, the tangible capital improvements outlined in the application were not considered.

3. Job Creation (Integrated System) Overall Number of Jobs Created.

Applicant has provided a Job Creation Plan which shows 22 types of projected jobs. (See EXHIBIT D-Job Creation Plan). These are job types and not the total number of jobs. There are 16 employee types listed in the pay scale table on page 9 of 15 of the plan. There are 6 additional contractors and professional services agreements. The annual compensation of the 16 employee types for the provisioning center alone is $676,145 as shown on page 8 of 15. The provisioning center will have in excess of 22 actual jobs based on this budgeting. For example, a medicine tender will make $15 per hour. The plan indicates that there will be multiple medicine tenders. A facility could hire 5 full-time medicine tenders or 15 part-time medicine tenders and make it appear that there are additional jobs. This facility has
budgeted well over $650,000 per year for wages for both full and part time staff at the provisioning center alone. Once up and running, the grower and process facilities will also generate additional jobs.

4. Financial Structure and Financing

The applicant lost one point due to the following: "lacks a clear description on how the $900 (sic) purchase price will be covered." The application contains a document entitled "Buy and Sell Agreement" showing that the building will be financed by a mortgage. (See EXHIBIT E, paragraph 3). The Seller approved these terms and was satisfied that the buyer could obtain financing and is in receipt of documentation showing that the applicant has approved financing (EXHIBIT F).

5. Sufficient Financial Resources

The applicant was deducted one point for “lacking a clear description on how the $900K purchase price of the provisioning center” will be covered. Please see the item entitled “Financial Structure and Financing” in paragraph 4 above which shows that the building will be financed by a mortgage and the seller was satisfied.

6. Content and Sufficiency of Information; Professionalism of submitted Documentation Including Clear Labeling of Items

Points were deducted “because of letter sent via email 2/25/2019 due to expiration of bond. No response within 14 days to second letter as requested.” On 2/25/2019, Deb Biehler of the City Clerk’s office sent email correspondence that stated:

The bond on file for the Provisioning Center located at 815 W Edgewood Drive expired 12/4/18. Please submit a new bond or renewal copy in 14 days from the date of this email. Failure to submit the requested document could result in application denial and will impact your Score and Ranking. Please contact the Clerk’s Office with any questions. /s/ Deb Biehler

EXHIBIT G is an email chain showing that on Friday, March 8, 2019 at 6:29 PM, Mr. Travis Pollock emailed the requested bond renewals to Deb Biehler at her assigned city email address. Ms. Biehler did not respond to this email until Tuesday March 12, 2019 at 12:12 PM and indicated “Received and under review.” The Applicant compiled and provided bond renewals within the 14 day period which would have ended at the close of business on Monday, March 11, 2019. The Applicant should not be deducted points because the city did not open the email until the next day.
7. Litigation History

One point was deducted because applicant filed LARA Disclosure Form 8-SA to show litigation history. (EXHIBIT H). The point was deducted because this is “not a full history.” Although the LARA disclosures only requests litigation history going back 7 years, this is a full litigation history for this applicant. The applicant had nothing to disclose. The relevant ordinance section at 1300.6(B)(4) requires consideration of whether the applicant has a record of various detrimental acts prior to the application. The applicant has not been in litigation and did not fail to disclose any prior litigation.

On behalf of the applicant, thank you for your time and consideration of this Appeal. Please contact me if you have any questions or need additional documentation.

Very truly yours,

Plunkett Cooney

Jeffrey M. Schroder
Direct dial: (248) 594-2796
Email: jschroder@plunkettcooney.com

JMS/nw
Encl.

Open:

-87-
The entity has obtained and is under contract for lease and purchase of properly zoned buildings in the City of Lansing that comply with all ordinances and laws to conduct business for a provisioning center, cultivation site and processing facility. The entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing. Improvements to the neighborhood through financial donations and volunteer work will be performed by the entity’s staff and patients in conjunction with non-profits and charitable organizations. The entity will also strive to create as many jobs as possible employing local residents and veterans of Lansing with a focus on promoting from within the company. Employees will be paid 150% above Michigan minimum wage and will be supplied benefits.

**Planned Investment In The City Of Lansing**

(A) The entity plans for multiple licenses in the City of Lansing.

1. **Provisioning Center** (approx. 3,000 sq. ft. and $900,000 proposed cost).
2. **Cultivation Site** (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).
3. **Processing Facility** (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).

(B) The application being submitted is a license for a provisioning center located at 815 W. Edgewood Blvd. The entity will also submit applications for licenses of cultivation and processing facilities located at 745 Lake Lansing Road by December 31st, 2017. The proposed cultivation and processing location is 5,000 sq. ft. and will be used to grow and process 1,000 plants under a “Class B” license. As the entity is seeking to obtain three licenses: provisioning center, cultivation center and processing center, the goal of the entity is to be as vested in the City of Lansing as possible. Having two locations will require an increased workforce which will benefit the City of Lansing through local and state employee income taxes which will contribute to the City of Lansing. Additionally, the entity will be investing in the City of Lansing through purchasing and leasing multiple properties in the community which will bolster the real estate market and increase land value.
815 W. Edgewood Blvd, Lansing, MI 48911
- Lease Price – ($2,145/month or $25,740/year)
- Terms – 3 years
- Purchase Price - $900,000 to be closed upon license approval.

745 Lake Lansing Road, Lansing, MI 48906
- Lease Price – ($5,000/month or $60,000/year)
- Terms – 5 years

(C) The intent of the entity is to establish its headquarters for all operations in the City of Lansing and being fully integrated with all three licenses (provisioning, cultivation and, processing) in the community.

(D) The entity will make improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors.
(1) New exterior lighting will be installed at the facility making the community safer.

(2) Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.

(3) Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.

(4) All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

(E) Improving the properties used by the entity will entail renovating the landscape, buildings and overall aesthetics and will increase the land value in the community and surrounding neighborhood.

(F) The entity will engage in a multi-faceted community improvement program that extends beyond its member base and addresses areas of concern in the greater Lansing community.

(G) The entity plans on contributing yearly donations to the Lansing Public School District which will be based upon annual gross sales.

(1) Special focus of these donations will be for children’s programs, such as designating a majority of the money to be spent on music & art programs, which require supplies and instruments.

(H) The entity will also be giving back to the community by making financial donations and doing volunteer work, engaging in youth recreational activities and participating in youth drug prevention.

(I) The facility will hire local contractors, cleaning companies, waste disposal companies and try to acquire medical marihuana from cultivators located in Lansing to help stimulate the local economy.

(J) The facility will provide financial benefits to the community in the forms of property taxes, state sales taxes, personal property taxes and employment taxes.

(1) The anticipated local tax revenues generated by the entity’s operations will contribute to the local government efforts to maintain and improve its public services parks and community centers.

(K) The facility will provide transportation free of charge to veterans, indigent and ill patients to be able to obtain medicine through the use of Uber, taxis, or public and private buses.

(L) The facility will sponsor the Michigan “Adopt A Highway” program with the Department of Transportation, to assist in the improvement of the section of U.S. Highway I-96 and U.S. Highway I-496 that run through the City of Lansing.

(M) The facility will donate throughout the year to the City of Lansing parks and recreation program.
(N) The facility will offer a program for local residents, indigent patients and veterans to gain medicine at a discounted rate. The entity will have a program focused on giving discounted rates, when medically necessary, to seniors, the terminally ill, low income individuals, veterans and displaced members of the community.

(O) The facility will work with local non-profit and charitable organizations including but not limited to: the VFW Post 701 and Grand River Park & Boat Launch which is part of Middle Grand River Organization of Watersheds to try and help either financially or through volunteerism to meet their specific needs and goals.

(P) The entity will take part in graffiti remediation in the community annually. Each employee will donate 10 hours a year of volunteer work.

(Q) As employees relocate to Lansing, home sales will increase and so will the land value.

(R) With the influx of new employees at the facility and new residents, a trickle-down effect of economic growth in the area will be established. Retail stores, restaurants and other businesses will enjoy greater sales and a higher profit margin.

(S) Ancillary services will focus on growing partnerships with local non-profits and community support organizations.

(1) Violence prevention workshops will be initiated by the entity as the company feels strongly about abuse of any kind and endeavors to make Lansing as safe as possible for the community as a whole.

**Job Creation**

The entity will strive to hire 100% of local residents and veterans whom will be paid above 150% of Michigan minimum state wage. Job fairs will be held in an effort to hire local residents for employment opportunities within the facility. The entity will additionally promote from within to increase employees' wages and positions within the company.

The entity will interview, conduct background checks and designate the level of access granted to an individual for an employee identification card. An internal check of all potential employees will occur prior to applying for state provisioning agent cards for all mentioned potential employees.

The company may choose to implement additional access restrictions at their discretion. The appointment of "key employees" and "non-key employees" is at the discretion of the hiring managers based upon a potential employee's skill sets and the position for which they applied. The following staffing plan depicts the hierarchy of this entity and its employees and how the provisioning center will benefit the citizens of Lansing.

**Training & Compensation For Employees**

(A) Monthly internal training for employees.

(1) Customer service.

(2) Effects and adverse reactions to medical marihuana use.
(3) Strain knowledge.

(4) Knowledge of different methods of administration of medicine that will best help with patients' specific ailment.

(5) Safety training in the facility of equipment utilized.

(B) Continuing Education.

(1) The entity will provide compensation to employees for any continuing education completed.

(2) The facility's staff will be educated about the standard operating procedures of the facility, expectations of the entity, the beneficial effects of using medical marijuana to help relieve the symptoms of specific medical ailments, and sources of information on a variety of medical and community topics.

(3) Education of employees will either be located onsite at the facility and proctored by upper level staff, completed online or obtained by attending courses at local and regional educational institutions.

Wages For Fulltime Employees

The entity will pay all employees a rate that is above 150% of Michigan minimum wage.

(A) 22 Types Of Projected Jobs & Rate Of Pay

(1) Chief Executive Officer - $31.25/hour

(2) Chief Financial Officer - $31.25/hour

(3) Director of Operations - $26.04/hour

(4) Director of Security - $26.04/hour

(5) General Manager - $26.04/hour

(6) Provisioning Center Manager - $20.83/hour

(7) Director Of Communications - $15.62/hour
(8) Medicine Tender – $15/hour

(9) Security - $18/hour

(10) Patient Services and Education Specialist – $15/hour

(11) Quality Assurance Specialist – $15/hour

(12) Inventory Control Specialist – $15/hour

(13) Community Outreach Coordinator – $15/hour

(14) Patient Advocacy Representative - $15/hour

(15) Bookkeeper – $25/hour

(16) Receptionist - $15/hour

(17) Secure Transportation – Based on 3rd party rate.

(18) Sanitation – Based on 3rd party rate.

(19) Laboratory Testing – Based on 3rd party rate.

(20) Legal Counsel – Based on 3rd party rate.

(21) Consultants – Based on 3rd party rate.

(22) CPA – Based on 3rd party rate.

**Plans To Integrate Cultivation Facility With Other Local Establishments**

(A) The entity will develop relationships with other state licensed provision centers in Lansing to discuss selling them processed and cultivated products.

(B) The Cultivation Center Manager will canvass the community and hold continuing education seminars at the facility to inform business owners of the facility’s existence.
(C) The entity will implement a mass marketing campaign utilizing direct mail, email blasts and our relationships gained with licensed medical marihuana testing laboratories to attract other provisioning centers to work with our cultivation facility.
EXHIBIT D
**Job Creation Plan**

Job Creation plan includes the following: The provisioning center is committed to providing a positive work environment for the estimated sixteen employees working within our job creation plan to build strong, positive relationships and assist in making our immediate community a promising, flourishing place to live and work. It is our expectation that our plan clearly presents our provisioning center as a job creator, community oriented organization, committed to improving the lives of those around us. The following information details our job creation plan as a company and as an active partner in the Lansing community.

In support of our job creation plan, the provisioning centers will maintain a high staff-to-patient ratio in order to provide a consistent level of quality service. As patient numbers increase, the provisioning centers will adjust staffing to maintain this capability. The provisioning center has adopted a comprehensive worker training program to guide recruitment, hiring, training and managing of our employees. We will promote from within the company to increase value for both the employee and the local economic community. Highlights of the plan feature precise definition of responsibilities and clearly understood chains of authority. Well paid, well qualified, and well trained employees is a priority for the provisioning center.

(A) **22 Types Of Projected Jobs:**

1. **Chief Executive Officer:** As first in command, the CEO gives the provisioning center the proper strategic direction as well as creating a vision for success. He/she oversees all operations and business activities as well as develops strategies and plans that align with short-term and long-term objectives. The CEO sits on the Board of Directors and accepts all final fiscal responsibility and bottom line accountability. He/she oversees all hiring and provides feedback to the Board of Directors on performance. He/she is responsible for developing a high performing managerial team and for leading and motivating staff to promote and sustain employee engagement. For this specific position, the CEO must have in-depth knowledge of all aspects of the medical marihuana industry.

2. **Chief Financial Officer:** The Chief Financial Officer sits on the Board of Directors and is responsible for planning, developing, organizing, implementing, directing and evaluating the organization's fiscal function and performance. He/she must be well-versed in all aspects of financial management, including accounting, tax filings, banking operations, and payroll. The provisioning center's CFO is in charge of integrating the State’s approved seed-to-sale software into the provisioning center’s accounting practices and will work with the security director to monitor inventory control systems.
3) **Director of Operations:** The operations director oversees and directs the physical operations of the entire facility from start to finish: construction of the facility, build-out of the interior, the selection and installation of all utilities and equipment, on-going maintenance, and obtaining proper permits. He/she will report to and work with the CEO and CFO to ensure accurate projected costs, adherence to timelines, inspection preparedness, and strict compliance with local and state regulations. He/she is tasked with acquiring and assigning contracting bids according to the State’s and the provisioning center’s job creation goals. The director of operations provides leadership to all departments throughout the facility by planning, identifying, communicating and delegating responsibilities to the store management team to ensure a smooth flow of operations within the company. The director of operations guides the store manager and develops their talent in ensuring customer satisfaction, and measuring financial performance. He/she will oversee the day-to-day operations of the dispensary, managing core department managers (security, communications, patient services, and inventory) while managing all strategies and tasks related to the facility, accounting, sales, marketing, and public relations. He/she has financial responsibility for the provisioning center and is responsible for successful strategy execution. He or she keeps tight control of the senior management-approved budget and oversees operations according to established policies and procedures. He/she is responsible for overall building appearance, cleanliness, comfort, functionality, safety, security, and overall customer experience. The director of operations is ultimately responsible for employees’ strict adherence to laws and regulations concerning medical marijuana. The director of operations reports to and is accountable to the CEO and the CFO.

4) **Director of Security:** The Director of Security is responsible for understanding, implementing and ensuring compliance with all elements of safety and security mandated by the City of Lansing, State of Michigan and the provisioning center’s security plan. They will maintain strict vigilance regarding physical security of all patients, employees and the public and oversees the safety of staff and the security of the facility. They will also be responsible for operational awareness for the diversion and/or deviation of medicine. They are responsible for implementing the provisioning center’s design plans for the security procedures and protocols and security surveillance system, video surveillance system, and video storage. Ensuring adherence by all employees and that all systems are checked and maintained on a regular basis is a priority for the security director.
Additionally, they will be responsible for all security of the facility and its perimeter, and will train all staff as to standard security protocols. They are responsible for ensuring that all security equipment, alarms, locks, cameras and surveillance data are properly functioning, maintained and operational. They will hire and manage security guards, including conducting background checks for new employees. The security director will also work closely with the CFO to manage inventory to prevent theft and diversion. They will also oversee transportation and delivery assignments, making sure delivery manifests are properly completed and logged. They are also responsible for the security and safety of the immediate environment outside of the facility perimeter to the extent that the provisioning center’s operations are safe to the welfare of the neighbors, arising from the facility’s presence in the neighborhood.

(5) General Manager: General Manager will be responsible for the operational and management of the dispensary. The responsibilities of the General Manager include but are not limited to: the implementation and organization of day to day operations of the facility and the general welfare of all staff and patients; for assuring that the facility is in compliance with all City and State regulations; ensuring that all operations are run in strict compliance with provisioning center policies and procedures like: safe handling of medication, inventory control and tracking and loss prevention management, oversight of the packaging room and employee oversight implementing daily operational policy and procedures while being a liaison between them and the company.

(6) Provisioning Center Manager: Provisioning Center Managers are responsible individuals for the operational oversight and management of the provisioning center. They are also responsible for the implementation and organization of day to day facility operations and for the general welfare of all employees and patients. They have the overall purview of finished product, from logging in Inventory as it arrives in the provisioning center, to accounting for cash receipts at the end of the day. They manage the inventory of the provisioning center and orders specific sorts of medical marihuana from the cultivation facility to insure adequate Inventory. The provisioning center manager will work with the director of communications and community outreach coordinator to help understand what product segments are wanted by patients and to gather feedback as to the effectiveness of medical marihuana on treated conditions. This will lead to better patient outcomes and will result in overall growth to company. The provisioning center manager will be responsible for safe handling of medication, currency,
procurement of medication, inventory control and tracking, delivery manifests, oversight of the packaging room, loss prevention management, and product recall and while also trained to handle specific emergency situations. He/she is responsible for overall customer/patient experience implementing daily operational policy and procedures while being a liaison between the patient and company. The provisioning center manager and the director of operations are responsible for assuring that the facility is in compliance with all City and State regulations. The provisioning center manager will report to the CEO and CFO.

(7) Director of Communications: The Director of Communications is responsible for all internal and external communications for the dispensary and will position the provisioning center as the premier medical marihuana provisioning center in Michigan. External communications include creation of marketing materials, website posts and updates, and ensuring all materials comply with State regulations and laws. He/she is also responsible for all employee communications, including the creation of training materials and working with the CFO to promote retention in the workplace. The director of communications will work with the dispensary manager and community outreach coordinator to help organize patients outreach by various forms of communication. The director of communications works directly with the community outreach coordinator to host monthly meetings for the public to mitigate concerns in the immediate community.

(8) Medicine Tender: The medicine tender is the company’s interface with the public. He/she is responsible for ensuring that all medical marihuana product dispensed inside the entity is done a friendly, safe, and compliant manner. They are responsible for offering advice to patients on which products would best help treat their symptoms while directing the patient to the medical marihuana strain and corresponding potency. He/she can discuss the physical properties, effects, and treatments of medical marihuana that best fits the patient’s needs. He/she is responsible for confirming identity and qualification for receipt of medication. He/she is responsible for proper cash and product transactions, and insuring each sale goes through the state certified point of sale system. After a patient has selected their medicine, the patient is brought to the check-out area where the provisioning center’s medicine tender will review the order for accuracy. The medicine tender will print the labels for each product and affix them in the proper compliant manner while processing the patient’s transaction. When educational material are requested, they will provide the necessary
paperwork for the store, checks inventory against the previous night's closing inventory, reconciles cash at the end of the day, and insures that the sales have been properly entered into the point of sale system and that no patient information has been retained beyond what is allowed by law. They will dispense pre-packaged medical marijuana and will not have access to any inventory other than the inventory which is on site in security sealed child proof packaging. He/she works alongside security guard to facilitate patient transactions and to avoid theft. The provisioning center medicine tender reports to the provisioning center manager and works together with the director of communications and community outreach coordinator on patient education and product knowledge.

(9) Security: Security guards works with the security director and the medicine tenders. They are responsible for ensuring company facility, employees, patients and products are well secured in accordance with established procedures and policies. They will monitor and authorize entrance and departure of employees, visitors, vendors and other persons, asking for appropriate documentation in order to stop suspicious people and guard against theft. They is responsible for maintaining security of premises, conducting security checks, viewing security monitors, and reporting significant problems to authorities. They will complete scheduled security reports. They will maintain the provisioning center’s stability and reputation by complying with local, state laws and regulations. The security guard will have access to different types of methods needed to contact police, medical services, fire etc. when necessary.

(10) Patient Services and Education Specialist: The Patient Services and Education Specialist will meet with patients, assess their needs and actively engage them in developing a treatment and medication plan. Will compile and distribute all applicable informational and educational materials and disclosures, and will monitor the patient’s usage for signs of adverse effects or misuse. Receives comments and input from patients on a case by case basis, and conducts informal surveys of the patients for ratings as to service and satisfaction.

(11) Quality Assurance Specialist: The Quality Assurance Specialist is responsible for scales calibration and, to ensure all medicine is free from toxins, molds, pesticides and other impurities and acts as liaison with the testing laboratories. Responsible for product handling, including weighing and repackaging products for sale. Labeling and sealing all packaging. Maintaining cleanliness standards in the
handling of product. They are responsible for ordering packaging and labeling materials. Ensuring that such materials are not defective and that proper labeling and packaging of products is compliant with applicable state and city laws and ordinances.

(12) Inventory Control Specialist: The Inventory Control Specialist will assist the provisioning center manager in implementing and overseeing the inventory control system in coordination with METRC the approved Inventory control vendor. Will monitor Inventory counts. Assist in the review and revision of theft/diversion prevention procedures utilizing both the computerized inventory system and developing procedures in the handling of inventory and currency.

(13) Community Outreach Coordinator: The Community Outreach Coordinator will assist with the administration duties associated with patient sign-ups and community events. This role is primarily responsible for supporting the provisioning center in establishing community relationships, helping patients through the application process and prospecting new opportunities which will assist residents and improve the community. They will serve as a resource for patient cells and inquiries that come into the provisioning center. They will also provide support and organize seminars and workshops, sign-ups and community events. They will organize all necessary details for on-site events including allocating space, room setup, a/v requirements and materials. They will stay up to date with medical marihuana rules and regulations. They will serve as support for social media and electronic inquiries. The Community Outreach Coordinator will develop and implement community outreach projects every month and coordinate different ways that employees, patients, and caregivers, can volunteer and/or contribute to the community. The Community Outreach Coordinator will act as an intermediate between the facility and the community. Their primary responsibility will be to increase the public image of the facility and the proper use of medical marihuana, as well as, assess and respond to any questions, issues and/or complaints from the community. Additionally the Community Liaison will be responsible for coordinating community beautification projects to help improve the surrounding area and neighborhood.

(14) Patient Advocacy Representative: Patient Advocacy staff will act as a liaison between patients, doctors and related resources. Patient advocacy is an area of specialization in healthcare concerned with the advocacy for patients and caregivers. The patient advocate may be an individual or organization, often, though not always, concerned with one specific group of disorders, illnesses or treatment solutions. The facility's patient advocate will work directly with the
Institutions that are responsible for the patient's care. Typical advocacy responsibilities include but are not limited to: patient rights, matters of privacy, confidentiality or informed consent, patient representation, awareness building, support and education of patients and their caregivers.

(15) **Bookkeeper**: Bookkeeper will be responsible for all accounts payable and accounts receivable, inventory management, tracking of purchasing and selling of medical marijuana by the business, taxes and any other financial matters such as employee payroll.

(16) **Receptionist**: Receptionist will handle all patient check-ins, visitor logs and field inbound phone calls. Additionally, the receptionist will organize all documentation in regard to patient, visitor and third-party information. Receptionist will maintain clear lines of communication with the manager on duty to advise them of any issues.

(17) **Secure Transportation**: Drivers will be responsible for the transportation of medical marijuana products from cultivation and manufacturing facilities to dispensaries. All products will be weighed, counted and fully documented in an electronic verification system. Drivers will collect a signed manifest of all deliveries. In the case of emergency, they will report the emergency immediately to law enforcement through the 911 emergency system located inside the transport vehicle.

(18) **Sanitation**: Sanitation will be in charge of cleaning the facility on a nightly basis to provide a clean and sanitary environment. They will be responsible for everything from mopping floors, emptying garbage, cleaning bathrooms, wiping down counters and phones.

(19) **Laboratory Testing**: The laboratory will be in charge of testing products from the facility to ensure they are free of mold, pesticides and other contaminants.

(20) **Legal Counsel**: Legal Counsel will be responsible for any and all aspects of legal issues that may arise for the business. Legal counsel will also assist in helping to maintain compliance, regulatory checks, audits, new document formation and any other legally binding paperwork which is necessary for the company to conduct business in full compliance with all laws and ordinances.
(21) **Consultants:** Consultants will act as the primary body ensuring this business is compliant with all federal, state, and local regulations. Additionally, consultants will help business owners to improve practices for operating a business and provide necessary advice to help ensure success.

(22) **CPA:** CPA will have complete oversight into all financial transactions for the business and be responsible for documenting and submitting any and all federal and state taxes on a yearly basis. The CPA will also assist in financial planning, investments, mergers, acquisitions, consulting, objective advice and assistance in both financial and strategic areas.

(A) **Employees' Annual Compensation:** Compensation refers to all forms of pay and rewards received by employees for performance in their jobs, including all forms of cash, benefits, services and perks. The provisioning center will strive to hire 100% of local residents whom will be paid above 150% of Michigan minimum state wage. The current minimum wage in Michigan is $8.90/hour. Households in Lansing, MI have a median annual income of $27,679, which is less than the median annual income in the United States. One hundred percent of our employees will be paid at $15 an hour or above. The importance of compensation will promote the attraction, retention and development of quality people. The total amount and type of compensation for the provisioning center is $676,145, not including those companies and individuals that have a 3rd party rate. Compensation is given in financial rewards that are either direct or indirect:

1. Direct compensation:
   1. Wages and salaries.
   2. Starting pay rate far above minimum wage.
   3. Raises each a year based on work performance.
   4. Incentives.
   5. Bonuses and commissions.
   6. Tuition reimbursement.
(2) Indirect compensation:

(a) Workers Compensation.
(b) Health benefits.
(c) Vacation pay.
(d) Sick pay.
(e) Holiday pay.
(f) Promotion from within based on work performance.

(3) Pay scale table:

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Director of Operations</td>
<td>$54,163</td>
</tr>
<tr>
<td>Director of Security</td>
<td>$54,163</td>
</tr>
<tr>
<td>General Manager</td>
<td>$54,163</td>
</tr>
<tr>
<td>Provisioning Center Manager</td>
<td>$43,326</td>
</tr>
<tr>
<td>Director of Communications</td>
<td>$32,490</td>
</tr>
<tr>
<td>Medicine Tender</td>
<td>$31,200</td>
</tr>
<tr>
<td>Security</td>
<td>$37,440</td>
</tr>
<tr>
<td>Patient Services and Education Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Quality Assurance Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Inventory Control Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Community Outreach Coordinator</td>
<td>$31,200</td>
</tr>
<tr>
<td>Patient Advocacy Representative</td>
<td>$31,200</td>
</tr>
<tr>
<td>Bookkeeper</td>
<td>$52,000</td>
</tr>
<tr>
<td>Receptionist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Secure Transportation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Sanitation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Laboratory Testing</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Legal Counsel</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Consultants</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>CPA</td>
<td>Based on 3rd party rate</td>
</tr>
</tbody>
</table>
(B) Veterans Hiring Program: The provisioning center's veteran's hiring program will recruit, retain, and employ veterans. Veterans and returning service members bring a unique skills set and experiences to the civilian workforce. Because of the training, work ethic and goal-oriented culture of the military, veterans not only make excellent employees, but also tend to have a higher rate of retention. Veterans bring with them the skills to do the job, in a timely and efficient manner. These skills such as leadership, management, teamwork, accountability and responsibility are qualities that can benefit our productivity.

(1) Recruit: The provisioning center will establish our job application process as Veteran-friendly. We will consider military service as a part of an applicant's work history during the hiring process. Military service is an important part of an applicant's background and can be a strong predictor of his or her ability to receive and respond to supervision and training. Leadership skills and leadership potential are also indicative of an applicant who has successfully completed his or her military obligation. We will request and utilize the DD214 as proof of service completion and hire without judgement. We will utilize the Military Occupational Classification code by entering at this code into the U.S. Department of Labor's Occupational Information Network (O*NET) to locate a civilian equivalent job title.

(a) Our website will mention recruiting materials that our organization values the service Veterans and their family members have given to our country and that we support the hiring of returning service members and military spouses.

(i) On the "careers" portion of our website, we will include the following statements: If you are a Veteran and would like assistance with the employment process at The Provisioning Center, please contact us at vetjobs@ourprovisioningcenter.com.

(ii) If you are a Veteran and would like assistance with the employment process please RSVP and save the date to join our monthly Veterans Hiring Program every first Friday of each month.

(iii) We will actively recruit Veterans, Wounded Warriors and military by finding Veterans and Instituting strategies to help Veterans connect with us. We will access credible resources to help locate qualified, local Veterans and wounded warriors who are seeking employment.

(2) Retain: We will promote within the workplace to retain our veteran employees. Retaining a skilled workforce requires effort after the hire, retaining a veteran in the civilian workforce is not all that different than retaining other top talent. We will
ensure our Veteran's know and feel they are appreciated, respected and worthwhile to our team.

(a) We will place a value on military service. We will develop and promote peer mentorships in the workplace. We will practice public Veterans appreciation and promote a Veteran-friendly workplace. We recognize that military families may have different needs than civilian families and understand our responsibilities under USERRA.

(3) Employ: We will hire qualified, local Veterans and will accommodate Wounded Warriors. We understand our responsibilities under the Americans with Disabilities Act (ADA). We will network with these three organizations to create out Veteran employee recruitment pool.

(a) National Network Organization for Veterans, Community Service/Non-Profit, 1832 Briarwood Drive, Lansing, MI 48917, Phone number (517) 749-8735.

(b) Michigan Workforce Development Agency, Victor Office Center, 201 N. Washington Square, Lansing, MI 48913, Phone: 517-335-5858.


(f) Veterans will be referred to post their resume at the Mitalent website.

(C) Ancillary Economic Anchor: The provisioning center will hire local contractors, cleaning companies, waste disposal companies and will acquire medical marihuana from cultivators located in Lansing to help stimulate the local economy. The marihuana industry is growing at such a fast pace and there are untold job opportunities related to medical marihuana. Some of these positions include promotion, photography, creative design, brand ambassador, reviewers, media and more. There are plenty of great opportunities. Marihuana business is just like a regular business. Specialty companies will be needed to ship, test, market, enforce, track, insure, construct, lobby, inspect in the medical marihuana industry. The need for marketing, accounting, sales, logistics and management positions are necessary.

(1) This list is composed primarily of common business categories that have decided to target the medical marihuana industry:

(a) Advertising.
(b) Compliance.

   (i) Cleaning companies.

   (ii) Contractors.

   (iii) Waste Disposal Companies.

(c) Consulting.

   (i) Technical Writers.

(d) Cultivation Products & Services.

   (i) Nurseries.

   (ii) Lighting equipment.

   (iii) Ventilation equipment.

   (iv) Pest Control.

   (v) Culinary services.

(e) Extraction equipment.

(f) Lab Testing Services.

(g) Legal Professionals.

   (i) Lawyers.

(h) IT/Software Professionals.

   (i) Software Development.

(i) Media/Publishing/Events.

   (i) Promotion.

   (ii) Photography.
(iii) Graphic Design.

(iv) Creative Design.

(v) Review Writers.

(j) Marketing professionals.

(l) Digital Marketing.

(ll) Brand ambassador.

(k) Packaging.

(l) Payroll.

(m) Accounting.

(n) Staffing.

(o) Security professionals.

(p) Tourism.

(D) Worker Training Program and Promoting From Within The Company: The provisioning center team will be trained to represent the quality medicine and the outstanding service we provide. Worker training is essential for specific purposes related to the marijuana industry. There will be a worker training program that develops employees toward advancement in long-term career goals within our provisioning center. Learning and upgrading employee skills becomes successive as our employees grow but the long-term gains associated with employee training make a huge retention difference. The short-term expense of a worker training program ensures keeping qualified and productive workers who will share their knowledge with new hires. Here are some of the development initiatives:

(1) Recruit & Hire: The first step is hiring the right people for the right position. We are passionate about hiring veterans, they already come with a skills set learned while in military service. The hiring process identifies the job equivalent of the veterans who are the best fit employees for the provisioning center. The recruitment process is designed educate these veterans to move up within the legal marijuana industry.
The provisioning center is eager to invest in a long-term relationship with the veteran community to gain access to their unique skill sets.

(2) **Provide Worker Training:** The worker training program begins at the start of employment. We value the time educating the new hires about the marihuana industry, the various processes involved, and the medical marihuana culture. New workers will be introduced to core tasks early and will learn through experience.

(a) Training helps our business run better. Trained employees will be better equipped to handle customer inquiries, make a sale or use computer systems. Training is a recruiting tool. Today's young workers want more than a paycheck. They are geared toward seeking employment that allows them to learn new skills. You are more likely to attract and keep good employees if you can offer development opportunities.

(b) Training promotes job satisfaction. Nurturing employees to develop more rounded skill sets will help them contribute to the company. The more engaged and involved they are in working for our success, the better our rewards. Training is a retention tool, instilling loyalty and commitment from good workers. Staff looking for the next challenge will be more likely to stay if you offer ways for them to learn and grow while at our company. Don't give them a reason to move on by letting them stagnate once they've mastered initial tasks.

(c) Training adds flexibility and efficiency because we can easily cross-train employees to be capable in more than one aspect of the business. Teach them to be competent in sales, customer service, administration and operations. This will help keep them interested and will be enormously helpful when setting schedules or filling in for absences. Cross-training also fosters team spirit, as employees appreciate the challenges faced by co-workers.

(d) Training is essential for knowledge transfer. It's very important to share knowledge among our staff. If only one person has special skills, we'll have a tough time recouping their knowledge if they suddenly leave the company. We will spread knowledge around like diversifying our investments. Training gives seasonal workers a reason to return. Instead of hiring someone new, we offer our employees a chance to learn new skills and benefit from their experience with a possible promotion.

(3) **Offer Continuous Learning & Development:** The marihuana industry is becoming increasingly sophisticated both technically and medically, medicine tenders will need to ensure they are educated with the latest strains available and research on
marihuana. We aim not only invest in our knowledge capital for our company, but to increase loyalty through this investment in education too. The tasks that are assigned to each employee is intentional. We aim to monitor the frequency of tasks, hours involved, and productivity.

(4) Recognize Retention & Promote: Remember, if you help them grow their careers, they'll help you grow your business. Everyone likes to have a sense of ownership of their work and to have that feeling that they are contributing to the company. Medicine tenders who aspire to dedicate their careers to the legal marihuana industry will likely be looking to progress in their jobs and learn over time. We will give them opportunities to step up to take leadership or ownership over certain tasks. Where we can, give as much autonomy to our medicine tenders on their projects to work towards a results-driven culture. As we seek to engage our employees through the training offered, education available, and a variety of tasks at hand we take some time to understand our employees' career goals. While many love their work as medicine tenders, some may aspire to move up in the field or expand their involvement in the business. Nurture those dreams, and recognize talent early. Act as a mentor and show them some of the real challenges involved in ownership. We will promote from within when we can. We care about our employees' careers as much as they do. Job performance, Reliability, Dependability, Punctuality, Frequency of missed days, Performance under stress, Ability to lead and ability to follow company guidelines are all factors when developing and considering an employee promotion. We offer an extensive training program, where new hires are not put onto the floor to help customers until they have completed a 2-week to 4-week training program. This ensures that they are educated on industry regulations, general marijuana information and have learned what types of products our store has available, along with the process of making each product.
## Monthly Operating Budget

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<thead>
<tr>
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<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
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<tbody>
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### Start Up Expense

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<tr>
<th>Expense</th>
<th>Amount</th>
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</thead>
<tbody>
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<td>Building Lease Deposit</td>
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<td>Building Lease</td>
<td>$2,500.00</td>
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<tr>
<td>Architect</td>
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<tr>
<td>Licensing Fee</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Insurance Deposit</td>
<td>$1,863.76</td>
</tr>
<tr>
<td>Tenant Improvements</td>
<td>$38,512.00</td>
</tr>
<tr>
<td>Tracking Equipment</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Office Equipment</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Furniture</td>
<td>$4,000.00</td>
</tr>
<tr>
<td>Security Equipment</td>
<td>$24,000.00</td>
</tr>
</tbody>
</table>

**Total** $88,375.76

### Projected Revenue

<table>
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<tr>
<th>Year</th>
<th>Patients Per Day</th>
<th>Average amount spent per patient</th>
<th>Average Per Day</th>
<th>Average Per Week</th>
<th>Average Per Month</th>
<th>Average Sales Per Year</th>
<th>Total Expense Per Year</th>
<th>Net Profit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>50</td>
<td>$70.00</td>
<td>$3,500.00</td>
<td>$24,500.00</td>
<td>$98,000.00</td>
<td>$1,176,000.00</td>
<td>$1,073,062.08</td>
<td>$102,937.92</td>
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<tr>
<td>2</td>
<td>100</td>
<td>$70.00</td>
<td>$7,000.00</td>
<td>$49,000.00</td>
<td>$196,000.00</td>
<td>$2,352,000.00</td>
<td>$1,379,062.08</td>
<td>$972,937.92</td>
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<tr>
<td>3</td>
<td>200</td>
<td>$70.00</td>
<td>$14,000.00</td>
<td>$98,000.00</td>
<td>$392,000.00</td>
<td>$4,704,000.00</td>
<td>$1,946,062.08</td>
<td>$2,757,937.92</td>
</tr>
</tbody>
</table>

Note: The units for average per day are in lbs, and the units for average per week are in lbs per day.

-115-
## 1300.5(23) Annual Budget Revenue

<table>
<thead>
<tr>
<th>Investment</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>6 Months of Operating Expense @ $89,421.84</td>
<td>$536,531.04</td>
</tr>
<tr>
<td>Start Up Expense</td>
<td>$88,375.76</td>
</tr>
<tr>
<td><strong>Total Investment</strong></td>
<td><strong>$624,906.80</strong></td>
</tr>
</tbody>
</table>
EXHIBIT E
BUY AND SELL AGREEMENT
FOR OFFICE, COMMERCIAL, INDUSTRIAL AND MULTI-FAMILY PROPERTY

Office of MARTIN COMMERCIAL PROPERTIES, INC., a Michigan Corporation d/b/a CRE|MARTIN, REALTOR, 1111 Michigan Avenue, Suite 200, East Lansing, MI 48823, Phone: (517) 351-2200 Fax: (517) 351-2201

1. PURCHASER'S OFFER. The undersigned, Wetx Lesning, LLC or any permitted Assignee (hereinafter called the PURCHASER), hereby offers to buy from SELLER through CRE|MARTIN, the following property located in the City of Lansing, County of Ingham, State of Michigan, commonly known as: 818 Woodland Blvd, Lansing, MI with a parcel identification number of: xx-xx-xx-xx-xx (hereafter called the Property), subject to existing building and use restrictions, zoning ordinances and easements. If any of these are reasonably acceptable to PURCHASER, and under the following terms and conditions.

2. PURCHASE PRICE. The purchase price for the Property is Nine Hundred Thousand and 00/100 ($900,000.00) Dollars, subject to performance by SELLER of the closing obligations specified in Section 14 below.

3. TERMS OF PAYMENT. Terms of payment shall be as indicated by "X" below. (Other unmarked terms of purchase do not apply.)

4. NEW MORTGAGE. The PURCHASER shall pay the full purchase price to the SELLER upon execution and delivery of a warranty deed and contingent upon the PURCHASERS ability to obtain a mortgage. If PURCHASER does not deliver to SELLER an x before January 1, 2018, proof that PURCHASER has accepted a loan commitment, SELLER may then transfer this contingency as not having been satisfied and terminate this Agreement by written notice to PURCHASER.

5. SURVEY. A _____ new _____ (or specified) ALTA __ existing survey, showing all easements of record shall be provided by SELLER. Any new or updated survey shall be paid for by PURCHASER.

6. CLOSING AGREEMENTS. The following adjustments shall be made between the parties as of the close of business on the closing date. PURCHASER shall receive a credit or assume responsibility, as the case may be, for amounts attributable to time periods following the closing date:
   a. Prepaid rent and additional rent (as defined in this section).
   b. Interest of any existing indebtedness assumed by PURCHASER.
   c. Charges for any transferable service contracts assigned to PURCHASER described in Exhibit A.
   d. Security deposits.

7. TITLE INSURANCE. At SELLER's expense, SELLER shall provide PURCHASER with a standard ALTA owner's policy of title insurance with standard exceptions in the amount of the purchase price, effective as of the close of closing. A commitment to issue such policy bearing marketable title vested in PURCHASER, including a tax status report, shall be made available for PURCHASER's inspection within ten (10) days of said execution and acceptance of this Agreement.

8. CONVEYANCE. Upon performance by PURCHASER of the closing obligations specified in Section 15 below, SELLER shall convey the Property to PURCHASER by warranty deed, free from liens, encumbrances, claims of others, unless otherwise specified herein.

9. WARRANTIES OF SELLER. Except as otherwise provided or acknowledged in this Agreement, SELLER represents and warrants to PURCHASER as follows:
   a. SELLER's interest in the Property shall be transferred to PURCHASER on the closing date, free from liens, encumbrances, claims of others, unless otherwise specified herein.
   b. Performance of the obligations of SELLER under this Agreement shall not violate any contract, indenture, deed, easement, restriction, or other agreement applicable to SELLER or the Property.
   c. There is no litigation or pending proceeding, or to the SELLER's knowledge threatened, against or involving the SELLER or Property, and the SELLER does not know or have reason to know of any ground for any such
EXHIBIT G
See below

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

-------- Original Message --------
Subject: RE: [FWD: BONDS RENEWALS AND CERTIFICATES]
From: "Biehler, Deb" <Deb.Biehler@lansingmi.gov>
Date: Tue, March 12, 2019 12:12 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>

Received and under review.

Deb Biehler
Medical Marihuana Specialist
Lansing City Clerk’s Office
124 W. Michigan Avenue | Lansing, MI 48933
O: 517-483-4132  Fax: 517-377-0068
Deb.Biehler@lansingmi.gov
Website | Facebook | Twitter

Chris Swope, CMMC/CMC
From: travis@azpremiermanagement.com <travis@azpremiermanagement.com>
Sent: Friday, March 08, 2019 6:29 PM
To: Biehler, Deb <Deb.Biehler@lansingmi.gov>
Subject: [FWD: BONDS RENEWALS AND CERTIFICATES]

Deb,
Attached are the bond renewals for Wellness Lansing provisioning, cultivation, and manufacturing. Please let me know if these need to be signed somewhere by the licensee as we did not see a location.

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

-------- Original Message --------
Subject: BONDS RENEWALS AND CERTIFICATES
From: "jmetalofs@gmail.com" <agent@agencyinbox.com>
Date: Fri, March 08, 2019 2:37 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>,
"louie_lnc13@yahoo.com" <louie_lnc13@yahoo.com>

Good Afternoon,

Thank you for your patience! Please find attached verification certificates in which the insurance company has reinstated the bond. We are providing you a copy of the original bond. Please feel free to call or email with any questions or concerns.

Sincerely,

Mirna Guadron
Mirna Guadron, Broker

L.A. Metro Insurance Services
Southworth All Insurance Agency
92125 Llano Dr 304
Westlake Village, CA 91361
Email: jmetalofs@gmail.com
(C) (805) 652-1811 (O) (910) 508-9294
MARIJUANASURETYBONDS.COM

BONDS, COMMERCIAL AUTO, GENERAL LIABILITY, WORKERS’ COMPENSATION,
PERSONAL AUTO & HOME, HEALTH & LIFE
EXHIBIT H
**DISCLOSURE 8 - LITIGATION HISTORY**

Add additional pages if necessary.

Refer to the Application Instruction Booklet for instructions on how to complete this form at: www.texas.gov./www

---

**Applicant Name: Lane Evans**

**Phone No.: 218-786-7960**

---

Is the applicant currently a party to any civil lawsuits involving its business practice?

- [ ] No
- [ ] Yes

Has the applicant been a party to any other litigation during the past **seven years**?

- [ ] No
- [ ] Yes

In the previous **ten years**, has the applicant been accused of internal misconduct?

- [ ] No
- [ ] Yes

In the previous **ten years**, has an ultimate decision been issued adverse to the applicant or any of its officers, executives, or managers that would have or could have a current or future effect in the entity?

- [ ] No
- [ ] Yes

In the previous **ten years**, has an ultimate decision been issued adverse to the applicant or any of its officers, executives, or managers that could reasonably be expected to reflect upon the current or future financial responsibility or ability of the entity or the character, reputation, or integrity of the entity or any of its officers, executives or managers?

- [ ] No
- [ ] Yes

If you answered **YES** to any of the above questions, you are required to complete the following information.

---

(1) Please provide the following for all litigation related to the supplemental applicant's business practices, pending or concluded, for the past 7 years. (attach additional pages as necessary)

<table>
<thead>
<tr>
<th>Case Caption</th>
<th>Docket/Case No.</th>
<th>Court</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Case Caption</th>
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<th>Location</th>
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</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Case Caption</th>
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<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

For any cases that are currently pending, provide the case caption, the cause of action, and a brief explanation regarding the allegations of the case. (add additional pages if necessary)
EXHIBIT C
In Re:

Louie Elias d/b/a Wellness Lansing, LLC
Proposed Location: 815 W. Edgewood Blvd. Ste. E & F

Provisioning Center License Denial

This decision is remitted to the Clerk of the City of Lansing by Hearing Officer, Hilary M. Barnard, Esq., having been read and informed on the issues recommends that in regard to Louie Elias d/b/a Wellness Lansing, LLC and its license application for a Medical Mariahuana Provisioning Center that the license application remain denied.

FACTS

Louie Elias d/b/a Wellness Lansing, LLC ("Appellant") applied to the City of Lansing to operate a Medical Mariahuana Provisioning Center within the city limits. This recommendation follows a timely appeal from Appellant.

By letter dated March 14, 2019, Appellant was informed that its license application was denied because of its score and rank, having received a score of 80 out of 100. Appellant was informed that this score eliminated the possibility of scoring in the top twenty applicants and that it would not be receiving a provisioning center license. Appellant was also informed that it had the right to appeal the denial within 14 (fourteen) days of the letter's date by written statement with grounds for appeal. With the letter, Appellant was provided a copy of the City of Lansing Provisioning Center Ranking sheet for its business. On the document, Appellant is able to view the total possible points, its attained points, and short insight statements.

Appellant has point deficiencies in several categories.

Appellant's Position

Appellant disputes the denial. Appellant provides several arguments and exhibits to support its appeal. Appellant also provided additional documentation not in its original application.

City Clerk Position

The City Clerk affirms its position on the denial. The City Clerk further iterates that additional information was provided in an attempt to cure on appeal and that information is not to be considered.
Hilary M. Barnard  
Attorney at Law  

APPLICABLE LAW & REASONING

The issue is whether Appellant's Provisioning Center License Application for the City of Lansing was erroneously scored and denied.

In regard to the issuance of licenses and the appellate process for a license:

"The City Council shall provide, by ordinance, a procedure for the issuance of licenses and permits. The ordinance shall, to the greatest extent possible, place the responsibility for the issuance of licenses and permits under one official in order that persons requesting specific licenses and permits will not have to contact more than one City office."¹

At the denial of a license under City of Lansing Ordinance No. 1217, an applicant:

May appeal to the city clerk, who shall appoint a hearing officer to hear and evaluate the appeal and make a recommendation to the clerk. Such appeal shall be taken by filing with the city clerk, within 14 days after notice of the action complained of has been mailed to the applicant's last known address on the records of the city clerk, a written statement setting forth fully the grounds for the appeal. The clerk shall review the report and recommendation of the hearing officer and make a decision on the matter. The clerk's decision may be further appealed to the commission if applied for in writing to the commission no later than thirty (30) days from the clerk's decision.²

* * *

[The] review of an appeal shall not be de novo. The commission shall only overturn, or modify, a decision or finding of the clerk if it finds such decision or finding to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole record considered by the clerk in arriving at such decision or finding.³

The arbitrary or capricious standard of review is the commission's review and is adopted by this Hearing Officer.⁴ Arbitrary and capricious have generally accepted meanings.⁵ Arbitrary is "without adequate determining principle... [f]ixed or arrived at through an exercise of will or by caprice, without consideration or adjustment with reference to principles, circumstances, or significance, ... decisive but unreasoned." ⁶ Capricious is "apt to change suddenly; freakish;

¹ See LANSING CITY CLERK'S OFFICE, City of Lansing City Charter (as amended) at 24 (2015) available at: https://www.lansingmi.gov/DocumentCenter/View/2126/City-Charter#bidId=. In this instance, the license issuance is handled with the City Clerk's office.
² City of Lansing Ordinance No. 1217 Sec. 1300.15(C).
³ Id. at 1300-31(E).
⁴ There is an inherent binary in license issuance: issued or denied, not a spectrum of decisions. Given that this is a licensing situation, and that the only prescribed review under Ordinance No. 1217 is arbitrary and capricious, that is the standard that will be observed here.
⁶ Id.
Hilary M. Barnard
Attorney at Law

whimsical; humorous. The burden is on the party attacking to affirmatively prove the arbitrary and unreasonable decision. This is not to say that a local body may "abrogate constitutional restraints."

As to whether an applicant can submit supplemental materials on appeal, the Lansing Ordinance in Section 1300.5(B) states that "[a] complete application for a license or licenses required by this chapter shall be made under oath on forms provided by the city clerk and shall contain all of the following[.]" (emphasis added). The ordinance then enumerates all the documents and information required for application submission. Per Michigan Court rule, appeals are based on the record already in place. Further, an appellate body will generally not consider issues not raised in or ruled on by a lower review. The appellate review is limited to the record before the lower court at the time of the relevant decision.

Under the City of Lansing Ordinance No. 1217 Section 1300.5:

(B)(12)(IV) Planned tangible capital investment in the city, including detail related to the number and nature of applicant's proposed medical marihuana establishments in the city and whether the locations of such establishments will be owned or leased; further, if multiple licenses are proposed, an explanation of the economic benefits to the city and job creation, if any, to be achieved through the award of such multiple licenses. Supporting factual data shall be included with the response to this subsection[.] (emphasis added)

Under the City of Lansing Ordinance No. 1217 Section 1300.6, review of an application will consider:

(D) In the event that there are more applicants for provisioning center licenses who meet the minimum requirements set forth in 1300.6(B) than there are licenses available in either phase one or two, the top scoring twenty (20) applicants in phase one and top scoring five (5) applicants in phase two, shall be eligible to receive provisioning center licenses in accordance with the assessment, evaluation, scoring, and ranking procedures established in this chapter[.]

The Lansing Ordinance incorporates provisions and definitions of the Medical Marihuana Facilities Licensing Act, 2016 PA 281 (as amended) ("MMFLA") so as to:

"not limit an individual's or entity's rights under the [Michigan Medical Marihuana Act (MMMA)], MMA or the [Michigan Tracking Act (MTA)]" and

---

7 Id.
9 Id. at 162.
10 See e.g., MCR 7.105(B)(4)(g)(d) (requiring that the appellate court receive a certified copy of a case's record and stating review of a trial court's decision was for legitimate reason based on "arguable support in the record[,]")
Hilary M. Barnard
Attorney at Law

drafters intended that “these acts supersede [the] ordinance where there is a conflict.”

A Lansing applicant must then comply with the MMFLA. Pursuant to Sec. 402 of the MMFLA, in evaluating an applicant for licensure, an applicant's history of "noncompliance with any regulatory requirements in this state or any other jurisdiction” will be considered.

Here, this Hearing Officer will decline to review any supplemental materials provided by Appellant in effort to cure application deficiencies. Per requirements in the Lansing Ordinance in Section 1300.5(B) and general state appellate practice, review on appeal is to the record originally provided and reviewed. See e.g., Napier v. Jacobs, 429 Mich. 222, 232-35 (1987). Thus, this review will address the appeal on Appellant’s first basis and the application as originally provided.

Addressing arguments under Buffering, Appellants has residential zoning three or more sides of its property line. The buffering tool by the city merits a score of “0” for this. Appellant argues that the decision must have been made based on proximity to commercial zoning. This is not what is articulated in the scoring insights which states “residential zoning on north, south & east (3) sides of the property which is score with zero points and falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.” Thus, there is no basis for awarding more points in this category.

Tangible Capital is addressed in Appellant’s appeal. The city defines tangible capital as an asset with a physical form. Thus, only such assets would count in the calculation. On the ranking sheet it appears the deduction is related to a lack of cultivation/processing facility ownership. As part of assessing tangible capital, the city looks to other facilities Appellant might have, but does not consider capital related to other applications/locations further. As such any capital not for this location would not be considered. Appellant points to improvements to another location but does not address capital for this location. Thus, Appellant has not met its burden as to this location and its associated tangible capital to merit more points.

Under Job Creation, Appellant’s insights state “Applicant only indicates there will be between 16 and 22 jobs created at the provisioning center and provides details about local hiring, monthly employee training, job creation plan, pay scale, titles, job descriptions, benefits, etc. Lacks an optimal number of jobs.” Any jobs pertaining to other locations would not be considered under this application. The Hearing Officer’s inquiry in assessing the argument is

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12 City of Lansing, Michigan Ordinance No. 1217 Sec. 1300.2(C).
13 Id. at Sec. 1300.2(D).
14 MMFLA, MCL § 333.27402[3][g].
15 In this case it discusses that an “exception that review is permissible to prevent a miscarriage of justice.” “Most jurisdictions recognize the authority of an appellate court to review an issue, even where the issue was not preserved, when some fundamental error would otherwise result in some egregious result.” However, that “such power of review is to be exercised quite sparingly. Napier, 429 Mich. at 233. Under the facts presented, there is not a fundamental error so as to trigger exercising supplementing on appeal.
16 The following statements in the tangible capital paragraph also correspond to Appellant’s Sufficient Financial Resources and Financial Structure and Financing arguments. Both of these two categories point to the appeal Exhibit F which is a Buy-Sell agreement. This adds nothing to Appellant’s argument because it shows the terms of the mortgage not how the money will be allocated.
Hilary M. Barnard
Attorney at Law

“how many jobs will this facility create.” Appellant states it has budgeted for both full and part time staff, and that “once up and running the grower and process facilities will also generate additional jobs.” Again, the grower and process facilities are not this location and would not be part of this particular application. Appellant provided its job creation plan with its appeal, which has a number of statements that do not give a quantifiable number of jobs. It gives types of jobs and simplistic descriptions but lacks detail and quantifiable numbers. The factfinder is “not permitted to draw its own conclusions from the evidence presented to the administrative body ... [and] must give deference to an agency's findings of fact.” The factfinder may not set aside findings just because other facts in the record could have come to a different conclusion.18 Thus, there is no basis to award additional points here.

As to Content and Sufficiency, Appellant argues that a point was deducted because of a bond expiration. From the scoring insights, it appears this was the case. Appellant did provide an updated bond document within the time period requested per the emails in Exhibit G. Appellant should be awarded 1 point back in this category.

In Litigation History, Appellant argues it provided all information. The LARA Disclosure form 8-SA would be for the Supplemental applicants, Appellant should have also included Disclosure form 8 for the Applicant itself. However, Appellant was awarded one point back in its Sufficient Financial Resources category for a full litigation history as to stakeholders as stated on the ranking sheet. Thus, no basis to award points in this category as there is only the 8-SA form that Appellant asked to be considered. Appellant has not addressed the issue for the score deduction. “Failure to brief a question on appeal is tantamount to abandoning it.”9 Appellant has abandoned its argument here.

CONCLUSION

For the foregoing reasons, it is recommended that Appellant's application for a provisioning center license remain denied, but allocated points as indicated above.

Respectfully Submitted,

Dated: April 3, 2019

Hilary M. Barnard, Hearing Officer

---

18 Id.
EXHIBIT D
April 5, 2019

Louie Ellas
160 Michelson Road
Rochester Hills, MI 48301

Dear Provisioning Center Applicant,

I have reviewed the report and recommendation of the hearing officer on your appeal of the Scoring and Ranking denial of your application to operate a Medical Marihuana Provisioning Center in the City of Lansing at 815 W Edgewood Blvd Suites E & F.

No additional points were added in the section entitled “Content and Sufficiency”. Every applicant that received a letter to cure a deficiency had a point deducted from this section. Your score remains at 80. I have determined your appeal is denied.

You have the right to appeal this denial of licensure to the Medical Marihuana Commission within thirty (30) days of the date of this letter by filing a written statement to the Commission with the City Clerk’s Office. The Medical Marihuana Commission Appeal will become a matter of public record. The Commission’s review of an appeal shall not be de novo. The Commission shall only overturn, or modify, a decision or finding of the Clerk if it finds such decision or finding to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole record considered by the Clerk in arriving at such decision or finding.

Should you choose to appeal to the Medical Marihuana Commission, your tentative appeal hearing date will be Friday, May 17, 2019 in the Clerk’s Office Training Room located at 2500 S Washington Avenue.

Chapter 1300 provides that should the applicant not receive a license, one-half the application fee shall be returned. This refund will be processed after all appeals are exhausted.

If you have begun business operations pursuant to State Emergency Rule 19 and Executive Order 2017-02, you must cease operations. Operations may resume only if your appeal is granted and the requirements of the temporary operation are satisfied.

Sincerely,

Chris Swope
City Clerk

cc: M. Yankowski, Lansing Police Chief
    J. Smiertka, Lansing City Attorney

Lansing City Clerk’s Office
Ninth Floor, City Hall, 124 W. Michigan Ave., Lansing, MI 48933-1695
517-483-4131  517-377-0068 FAX
www.lansingmi.gov/clerk  city.clerk@lansingmi.gov
<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Outreach</strong></td>
<td></td>
</tr>
<tr>
<td>Planned outreach</td>
<td>1</td>
</tr>
<tr>
<td>Plan to meet with neighborhood organizations, business association, crime watch, and other neighborhood organizations to provide contact information for questions, concerns, etc.</td>
<td>1</td>
</tr>
<tr>
<td>Improvements made or proposed to building</td>
<td>3</td>
</tr>
<tr>
<td>Plan to minimize/eliminate traffic</td>
<td>1</td>
</tr>
<tr>
<td>Plan to minimize/eliminate noise</td>
<td>2</td>
</tr>
<tr>
<td>Plan to minimize/eliminate odor</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total - Outreach</strong></td>
<td>10</td>
</tr>
</tbody>
</table>
# Medical Marijuana Provisioning Centers Scoring Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land Use</strong></td>
<td></td>
</tr>
<tr>
<td>Impact on neighborhood</td>
<td>5</td>
</tr>
<tr>
<td>Buffering between residential zoned areas and establishment</td>
<td></td>
</tr>
<tr>
<td>Traffic pattern(s)</td>
<td>5</td>
</tr>
<tr>
<td>Increased traffic on side streets will be scored lower</td>
<td></td>
</tr>
<tr>
<td>Resident safety</td>
<td>10</td>
</tr>
<tr>
<td>Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</td>
<td></td>
</tr>
<tr>
<td><strong>Total - Land Use</strong></td>
<td>20</td>
</tr>
</tbody>
</table>
# Medical Marijuana Provisioning Centers Scoring Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
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<tbody>
<tr>
<td><strong>Financial Stability &amp; Experience</strong></td>
<td></td>
</tr>
<tr>
<td>Sufficient Financial Resources</td>
<td>5</td>
</tr>
<tr>
<td>Financial forms including debt, bankruptcy, insolvency, tax compliance, tax returns and CPA attested, active bank/financial statements.</td>
<td></td>
</tr>
<tr>
<td>Business Experience</td>
<td>5</td>
</tr>
<tr>
<td>History of success in operating business or businesses, years of operation, relevant business experience, other commercial licenses, medical certifications and/or licenses</td>
<td></td>
</tr>
<tr>
<td>Total - Financial Stability &amp; Experience</td>
<td>10</td>
</tr>
<tr>
<td>Criteria</td>
<td>Maximum Points</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>Ownership structure</td>
<td></td>
</tr>
<tr>
<td>Organizational chart</td>
<td></td>
</tr>
<tr>
<td>Worker Training Program Short term and long term goals and objectives</td>
<td></td>
</tr>
<tr>
<td>Community outreach &amp; education</td>
<td></td>
</tr>
<tr>
<td>Marketing, advertising, promotion</td>
<td></td>
</tr>
<tr>
<td>Tangible capital investment in the City of Lansing</td>
<td></td>
</tr>
<tr>
<td>Job creation</td>
<td></td>
</tr>
<tr>
<td>Financial Structure and Financing</td>
<td></td>
</tr>
<tr>
<td>Plans to integrate grower facility with other establishments</td>
<td></td>
</tr>
<tr>
<td>Charitable plans and strategies</td>
<td></td>
</tr>
<tr>
<td>Job creation</td>
<td></td>
</tr>
<tr>
<td>Total - Business Plan/Job Creation</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
<td>5</td>
</tr>
<tr>
<td>Minimization of exposure to minors</td>
<td>4</td>
</tr>
<tr>
<td>Economic benefit to the City of the business plan, real property ownership, grower and/or processor facilities in the City</td>
<td>15</td>
</tr>
<tr>
<td>Overall number of jobs created within the City of Lansing (highest), Lansing region, and Michigan (lowest)</td>
<td>5</td>
</tr>
<tr>
<td>Net worth/capitalization sufficient for business plan as evidenced by notarized CPA attestation, financial institution statements, or the equivalent.</td>
<td>3</td>
</tr>
<tr>
<td>Commitment to fiscal and/or volunteer work</td>
<td>4</td>
</tr>
<tr>
<td>Number of jobs at the provisioning center</td>
<td>5</td>
</tr>
<tr>
<td>Amount and type of compensation</td>
<td>2</td>
</tr>
<tr>
<td>Percent of employees earning over $15 per hour</td>
<td>3</td>
</tr>
<tr>
<td>Projected annual budget and revenue</td>
<td>2</td>
</tr>
<tr>
<td>Incomplete plan will get zero points</td>
<td>50</td>
</tr>
</tbody>
</table>
## Medical Marijuana Provisioning Centers Scoring Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant/Stakeholder History</td>
<td></td>
</tr>
<tr>
<td>Lansing Police D complaints/incidents</td>
<td>4</td>
</tr>
<tr>
<td>Demonstration of regulatory compliance</td>
<td>4</td>
</tr>
<tr>
<td>Business litigation history</td>
<td>2</td>
</tr>
<tr>
<td>Total - Applicant/Stakeholder History</td>
<td>Will get zero points if found to have violated 2016 Ordinance #1202 Moratorium.</td>
</tr>
</tbody>
</table>

If information found in the application or review is determined to make the applicant ineligible for approval by the State of Michigan, then the application would be removed from consideration.
EXHIBIT F
1290.01. - Definitions.

As used in this chapter:

Adjacent means contiguous to, abutting or directly across a public street or alley from the subject property. However, if a public right-of-way is 100 feet in width or greater, or the right-of-way is the Grand River, then such property across the right-of-way shall not be considered adjacent.

Berm means an earthen mound containing plant materials or fencing designed to separate one area from another in an aesthetically pleasing manner.

Buffer means a physical area that separates one land use from another. Such area could be landscaped with plants and could also contain a berm, fence or other screening material.

Contiguous means having a common border; adjacent.

Fence means any wall (except a retaining wall), screen, partition or similar structure existing on a yard or parcel of land, which structure encloses land, divides land into distinct portions, separates contiguous properties, obstructs the passage of light or air into adjacent land or obstructs the vision of motorists on or near public roads. Barbed wire shall not be considered part of a fence for purposes of determining the height thereof.

Intensity of land use means the amount of activity associated with a specific land use. Intensity of land use shall be determined by the Department of Planning and Municipal Development based on the following criteria:

1. Amount of vehicular traffic generated;
2. Amount of pedestrian traffic generated;
3. Noise, odor and air pollution generated;
4. Potential for litter;
5. Type and storage of materials connected with the operation;
6. Total residential units and density, where applicable; and
7. Total building coverage on the parcel.

However, intensity of land use shall not be considered except when a building permit is required.

Landscaping means an arrangement of elements, such as plants, paving materials, earth, land areas and fencing or screening, on the exterior edges of property for aesthetic and functional purposes.

Nonresidential use means any use not a residential use.

Residential use means any land use which is primarily utilized by a person for living quarters. "Residential use" includes, but is not limited to, single-family dwellings, multifamily dwellings, dormitories, rooming houses or foster care facilities.

Screen means fence, landscaping, berm or combination thereof that obscures the view from one site to another to a reasonable extent.

Use means the carrying on of activities in a building or on a parcel of land. "Use" includes, but is not limited to, a business, office, industry, residence or parking or storage area.

(Ord. No. 809, 12-11-89)
EXHIBIT G
1300.18. - Zoning Board of Appeals.

(a) When applying for a license as a provisioning center, an applicant who does not meet the requirements of Sections 1300.13(a)(1) or (2) may seek a variance from those requirements by submitting with their application a Written application to the Board of Zoning Appeals and paying a fee set by Council resolution. Upon receiving an application with an accompanying application for a variance, the City Clerk shall determine whether the applicant has submitted a complete application meeting the requirements of this chapter, an appropriate nonrefundable license application fee, and an appropriate variance application fee. If the applicant has satisfied these requirements and the applicant has received written approvals required under this chapter, the City Clerk shall immediately forward the application to the Board of Zoning Appeals.

(1) The application must identify all of the reasons the applicant does not meet the requirements of Section 1300.13(a), including, if applicable, the name and address of any substance abuse treatment, prevention, or rehabilitation facility; church or other structure used for religious services; public park containing public playground equipment; or provisioning center that is within 500 feet of the applicant's location.

(2) Upon receipt of an application meeting the requirements of Subsection (a), the Board shall give notice to the occupants of any residential or commercial buildings within the buffered use distances set forth in Section 1300.13(a) of the applicant's location. If the occupant's name is not known, the term "occupant" may be used. The notices shall be delivered personally or by mail at the address given in the last assessment roll.

(3) The Board of Zoning Appeals shall either grant or deny the variance within a reasonable time. In determining whether to grant or deny the variance, the Board of Zoning Appeals shall consider all of the following:

i. The amount of time, if any, that the applicant has been operating in compliance with this chapter at the present location;

ii. The extent to which the applicant has demonstrated a commitment to the land use and public nuisance concerns in the surrounding neighborhood;

iii. The distance between the applicant's location and any medical marihuana provisioning center that is within 500 feet of the applicant's location;

iv. The need for a provisioning center at the location in order to provide the safe and efficient access to medical marihuana within the City;

v. The character of the structure and its surroundings; and

vi. The impact of the variance on the character of the structure's surroundings and owners of other properties in the vicinity.

(4) If the Board of Zoning Appeals approves the variance, the application and decision shall immediately be submitted to the City Clerk for further processing under this chapter.

(Ord. No. 1217, § 1, 9-7-17)
EXHIBIT I
Schroder, Jeffrey

From: travis@azpremiermanagement.com
Sent: Wednesday, March 27, 2019 12:17 PM
To: Schroder, Jeffrey
Subject: [FWD: RE: [FWD: BONDS RENEWALS AND CERTIFICATES]]

See below

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

Premier Management

-------- Original Message --------
Subject: RE: [FWD: BONDS RENEWALS AND CERTIFICATES]
From: "Biehler, Deb" <Deb.Biehler@lansingmi.gov>
Date: Tue, March 12, 2019 12:12 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>

Received and under review.

Deb Biehler
Medical Marihuana Specialist
Lansing City Clerk's Office
124 W. Michigan Avenue | Lansing, MI 48933
O: 517-483-4132  Fax: 517-377-0068
Deb.Biehler@lansingmi.gov
Website | Facebook | Twitter

Chris Swope, CMMC/CMC

-148-
From: travis@azpremiermanagement.com <travis@azpremiermanagement.com>
Sent: Friday, March 08, 2019 6:29 PM
To: Biehler, Deb <Deb.Biehler@lansingmi.gov>
Subject: [FWD: BONDS RENEWALS AND CERTIFICATES]

Deb,
Attached are the bond renewals for Wellness Lansing provisioning, cultivation, and manufacturing. Please let me know if these need to be signed somewhere by the licensee as we did not see a location.

Thank You
Travis Pollock
623-734-6708
AZ Premier Management
www.azpremiermanagement.com
https://www.facebook.com/azpremiermanagement/

-------- Original Message --------
Subject: BONDS RENEWALS AND CERTIFICATES
From: "jametroins@gmail.com" <agent@agencyinbox.com>
Date: Fri, March 08, 2019 2:37 pm
To: "travis@azpremiermanagement.com" <travis@azpremiermanagement.com>,
"louie_inc13@yahoo.com" <louie_inc13@yahoo.com>

Good Afternoon,

Thank you for your patience! Please find attached verification certificates in which the insurance company has reinstated the bond. We are providing you a copy of the original bond. Please feel free to call or email with any questions or concerns.

Sincerely,

Mimra Gudron
Mimra Gudron, Broker

L.A. Metro Insurance Services
Southworth All Insurance Agency
30215 Ladera Canyon Rd 304
Westlake Village, CA 91361
Box#1: lmaestroins@gmail.com
(O) (805) 832-1811 (O) (310) 508-9294
MARIJUANASURRYBONDS.COM
BONDS, COMMERCIAL AUTO, GENERAL LIABILITY, WORKERS' COMPENSATION,
PERSONAL AUTO & HOME, HEALTH & LIFE
EXHIBIT K
The entity has obtained and is under contract for lease and purchase of properly zoned buildings in the City of Lansing that comply with all ordinances and laws to conduct business for a provisioning center, cultivation site and processing facility. The entity will make improvements to these properties exteriors and interiors using licensed architectural firms and licensed contractors from the City of Lansing. Improvements to the neighborhood through financial donations and volunteer work will be performed by the entity's staff and patients in conjunction with non-profits and charitable organizations. The entity will also strive to create as many jobs as possible employing local residents and veterans of Lansing with a focus on promoting from within the company. Employees will be paid 150% above Michigan minimum wage and will be supplied benefits.

Planned Investment In The City Of Lansing

(A) The entity plans for multiple licenses in the City of Lansing.

(1) Provisioning Center (approx. 3,000 sq. ft. and $900,000 proposed cost).

(2) Cultivation Site (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).

(3) Processing Facility (approx. 5,000 sq. ft. and $30,000 proposed lease cost annually).

(B) The application being submitted is a license for a provisioning center located at 815 W. Edgewood Blvd. The entity will also submit applications for licenses of cultivation and processing facilities located at 745 Lake Lansing Road by December 31st, 2017. The proposed cultivation and processing location is 5,000 sq. ft. and will be used to grow and process 1,000 plants under a “Class B” license. As the entity is seeking to obtain three licenses: provisioning center, cultivation center and processing center, the goal of the entity is to be as vested in the City of Lansing as possible. Having two locations will require an increased workforce which will benefit the City of Lansing through local and state employee income taxes which will contribute to the City of Lansing. Additionally, the entity will be investing in the City of Lansing through purchasing and leasing multiple properties in the community which will bolster the real estate market and increase land value.
815 W. Edgewood Blvd, Lansing, MI 48911

- Lease Price – ($2,145/month or $25,740/year)
- Terms – 3 years
- Purchase Price - $900,000 to be closed upon license approval.

745 Lake Lansing Road, Lansing, MI 48906

- Lease Price – ($5,000/month or $60,000/year)
- Terms – 5 years

(C) The intent of the entity is to establish its headquarters for all operations in the City of Lansing and being fully integrated with all three licenses (provisioning, cultivation and, processing) in the community.

(D) The entity will make improvements to the buildings where the entity will be conducting operations, both to the exteriors and interiors.
(1) New exterior lighting will be installed at the facility making the community safer.

(2) Foliage will be planted around the facility and side streets in an effort to beautify the area and minimize the visual presence of the facility.

(3) Signage for traffic flow to ensure no additional impact on side streets will be positioned per the recommendations of the traffic impact study and will be in compliance with all ordinances and laws set forth by the City of Lansing.

(4) All facilities will have on-site security guards and surveillance cameras to deter theft and help decrease vagrancy and loitering in the area.

(E) Improving the properties used by the entity will entail renovating the landscape, buildings and overall aesthetics and will increase the land value in the community and surrounding neighborhood.

(F) The entity will engage in a multi-faceted community improvement program that extends beyond its member base and addresses areas of concern in the greater Lansing community.

(G) The entity plans on contributing yearly donations to the Lansing Public School District which will be based upon annual gross sales.

(1) Special focus of these donations will be for children's programs, such as designating a majority of the money to be spent on music & art programs, which require supplies and instruments.

(H) The entity will also be giving back to the community by making financial donations and doing volunteer work, engaging in youth recreational activities and participating in youth drug prevention.

(I) The facility will hire local contractors, cleaning companies, waste disposal companies and try to acquire medical marijuana from cultivators located in Lansing to help stimulate the local economy.

(J) The facility will provide financial benefits to the community in the forms of property taxes, state sales taxes, personal property taxes and employment taxes.

(1) The anticipated local tax revenues generated by the entity's operations will contribute to the local government efforts to maintain and improve its public services parks and community centers.

(K) The facility will provide transportation free of charge to veterans, indigent and ill patients to be able to obtain medicine through the use of Uber, taxis, or public and private buses.

(L) The facility will sponsor the Michigan "Adopt A Highway" program with the Department of Transportation, to assist in the improvement of the section of U.S. Highway I-96 and U.S. Highway I-496 that run through the City of Lansing.

(M) The facility will donate throughout the year to the City of Lansing parks and recreation program.
(N) The facility will offer a program for local residents, indigent patients and veterans to gain medicine at a discounted rate. The entity will have a program focused on giving discounted rates, when medically necessary, to seniors, the terminally ill, low income individuals, veterans and displaced members of the community.

(O) The facility will work with local non-profit and charitable organizations including but not limited to: the VFW Post 701 and Grand River Park & Boat Launch which is part of Middle Grand River Organization of Watersheds to try and help either financially or through volunteerism to meet their specific needs and goals.

(P) The entity will take part in graffiti remediation in the community annually. Each employee will donate 10 hours a year of volunteer work.

(Q) As employees relocate to Lansing, home sales will increase and so will the land value.

(R) With the influx of new employees at the facility and new residents, a trickle-down effect of economic growth in the area will be established. Retail stores, restaurants and other businesses will enjoy greater sales and a higher profit margin.

(S) Ancillary services will focus on growing partnerships with local non-profits and community support organizations.

(1) Violence prevention workshops will be Initiated by the entity as the company feels strongly about abuse of any kind and endeavors to make Lansing as safe as possible for the community as a whole.

Job Creation

The entity will strive to hire 100% of local residents and veterans whom will be paid above 150% of Michigan minimum state wage. Job fairs will be held in an effort to hire local residents for employment opportunities within the facility. The entity will additionally promote from within to increase employees’ wages and positions within the company.

The entity will interview, conduct background checks and designate the level of access granted to an individual for an employee identification card. An internal check of all potential employees will occur prior to applying for state provisioning agent cards for all mentioned potential employees.

The company may choose to implement additional access restrictions at their discretion. The appointment of "key employees" and "non-key employees" is at the discretion of the hiring managers based upon a potential employee's skill sets and the position for which they applied. The following staffing plan depicts the hierarchy of this entity and its employees and how the provisioning center will benefit the citizens of Lansing.

Training & Compensation For Employees

(A) Monthly Internal training for employees.

(1) Customer service.

(2) Effects and adverse reactions to medical marhuana use.
(3) Strain knowledge.

(4) Knowledge of different methods of administration of medicine that will best help with patients' specific ailment.

(5) Safety training in the facility of equipment utilized.

(B) Continuing Education.

(1) The entity will provide compensation to employees for any continuing education completed.

(2) The facility's staff will be educated about the standard operating procedures of the facility, expectations of the entity, the beneficial effects of using medical marijuana to help relieve the symptoms of specific medical ailments, and sources of information on a variety of medical and community topics.

(3) Education of employees will either be located onsite at the facility and proctored by upper level staff, completed online or obtained by attending courses at local and regional educational institutions.

Wages For Fulltime Employees

The entity will pay all employees a rate that is above 150% of Michigan minimum wage.

(A) 22 Types Of Projected Jobs & Rate Of Pay

(1) Chief Executive Officer - $31.25/hour

(2) Chief Financial Officer - $31.25/hour

(3) Director of Operations - $26.04/hour

(4) Director of Security - $26.04/hour

(5) General Manager - $26.04/hour

(6) Provisioning Center Manager - $20.83/hour

(7) Director Of Communications - $15.62/hour
(8) Medicine Tender – $15/hour

(9) Security - $18/hour

(10) Patient Services and Education Specialist – $15/hour

(11) Quality Assurance Specialist – $15/hour

(12) Inventory Control Specialist – $15/hour

(13) Community Outreach Coordinator – $15/hour

(14) Patient Advocacy Representative - $15/hour

(15) Bookkeeper -- $25/hour

(16) Receptionist - $15/hour

(17) Secure Transportation – Based on 3rd party rate.

(18) Sanitation – Based on 3rd party rate.

(19) Laboratory Testing – Based on 3rd party rate.

(20) Legal Counsel – Based on 3rd party rate.

(21) Consultants – Based on 3rd party rate.

(22) CPA – Based on 3rd party rate.

**Plans To Integrate Cultivation Facility With Other Local Establishments**

(A) The entity will develop relationships with other state licensed provision centers in Lansing to discuss selling them processed and cultivated products.

(B) The Cultivation Center Manager will canvass the community and hold continuing education seminars at the facility to inform business owners of the facility’s existence.
(C) The entity will implement a mass marketing campaign utilizing direct mail, email blasts and our relationships gained with licensed medical marihuana testing laboratories to attract other provisioning centers to work with our cultivation facility.
EXHIBIT L
1300.5(B)(23) – Job Creation Plan

Job Creation plan includes the following: The provisioning center is committed to providing a positive work environment for the estimated sixteen employees working within our job creation plan to build strong, positive relationships and assist in making our immediate community a promising, flourishing place to live and work. It is our expectation that our plan clearly presents our provisioning center as a job creator, community oriented organization, committed to Improving the lives of those around us. The following information details our Job creation plan as a company and as an active partner in the Lansing community.

In support of our job creation plan, the provisioning centers will maintain a high staff-to-patient ratio in order to provide a consistent level of quality service. As patient numbers increase, the provisioning centers will adjust staffing to maintain this capability. The provisioning center has adopted a comprehensive worker training program to guide recruitment, hiring, training and managing of our employees. We will promote from within the company to increase value for both the employee and the local economic community. Highlights of the plan feature precise definition of responsibilities and clearly understood chains of authority. Well paid, well qualified, and well trained employees is a priority for the provisioning center.

(A) 22 Types Of Projected Jobs:

(1) Chief Executive Officer: As first in command, the CEO gives the provisioning center the proper strategic direction as well as creating a vision for success. He/she oversees all operations and business activities as well as develops strategies and plans that align with short-term and long-term objectives. The CEO sits on the Board of Directors and accepts all final fiscal responsibility and bottom line accountability. He/she oversees all hiring and provides feedback to the Board of Directors on performance. He/she is responsible for developing a high performing managerial team and for leading and motivating staff to promote and sustain employee engagement. For this specific position, the CEO must have in-depth knowledge of all aspects of the medical marihuana industry.

(2) Chief Financial Officer: The Chief Financial Officer sits on the Board of Directors and is responsible for planning, developing, organizing, implementing, directing and evaluating the organization’s fiscal function and performance. He/she must be well-versed in all aspects of financial management, including accounting, tax filings, banking operations, and payroll. The provisioning center’s CFO is in charge of integrating the State’s approved seed-to-sale software into the provisioning center’s accounting practices and will work with the security director to monitor inventory control systems.
(3) **Director of Operations:** The operations director oversees and directs the physical operations of the entire facility from start to finish: construction of the facility, build-out of the interior, the selection and installation of all utilities and equipment, on-going maintenance, and obtaining proper permits. He/she will report to and work with the CEO and CFO to ensure accurate projected costs, adherence to timelines, inspection preparedness, and strict compliance with local and state regulations. He/she is tasked with acquiring and assigning contracting bids according to the State’s and the provisioning center’s job creation goals. The director of operations provides leadership to all departments throughout the facility by planning, identifying, communicating and delegating responsibilities to the store management team to ensure a smooth flow of operations within the company. The director of operations guides the store manager and develops their talent in ensuring customer satisfaction, and measuring financial performance. He/she will oversee the day-to-day operations of the dispensary, managing core department managers (security, communications, patient services, and inventory) while managing all strategies and tasks related to the facility, accounting, sales, marketing, and public relations. He/she has financial responsibility for the provisioning center and is responsible for successful strategy execution. He or she keeps tight control of the senior management-approved budget and oversees operations according to established policies and procedures. He/she is responsible for overall building appearance, cleanliness, comfort, functionality, safety, security, and overall customer experience. The director of operations is ultimately responsible for employees’ strict adherence to laws and regulations concerning medical marijuana. The director of operations reports to and is accountable to the CEO and the CFO.

(4) **Director of Security:** The Director of Security is responsible for understanding, implementing and ensuring compliance with all elements of safety and security mandated by the City of Lansing, State of Michigan and the provisioning center’s security plan. They will maintain strict vigilance regarding physical security of all patients, employees and the public and oversees the safety of staff and the security of the facility. They will also be responsible for operational awareness for the diversion and/or deviation of medicine. They are responsible for implementing the provisioning center’s design plans for the security procedures and protocols and security surveillance system, video surveillance system, and video storage. Ensuring adherence by all employees and that all systems are checked and maintained on a regular basis is a priority for the security director.
Additionally, they will be responsible for all security of the facility and its perimeter, and will train all staff as to standard security protocols. They are responsible for ensuring that all security equipment, alarms, locks, cameras and surveillance data are properly functioning, maintained and operational. They will hire and manage security guards, including conducting background checks for new employees. The security director will also work closely with the CFO to manage inventory to prevent theft and diversion. They will also oversee transportation and delivery assignments, making sure delivery manifest are properly completed and logged. They are also responsible for the security and safety of the immediate environment outside of the facility perimeter to the extent that the provisioning center’s operations are safe to the welfare of the neighbors, arising from the facility’s presence in the neighborhood.

(5) General Manager: General Manager will be responsible for the operational and management of the dispensary. The responsibilities of the General Manager include but are not limited to: the implementation and organization of day to day operations of the facility and the general welfare of all staff and patients; for assuring that the facility is in compliance with all City and State regulations; ensuring that all operations are run in strict compliance with provisioning center policies and procedures like: safe handling of medication, inventory control and tracking and loss prevention management, oversight of the packaging room and employee oversight implementing daily operational policy and procedures while being a liaison between them and the company.

(6) Provisioning Center Manager: Provisioning Center Managers are responsible individuals for the operational oversight and management of the provisioning center. They are also responsible for the implementation and organization of day to day facility operations and for the general welfare of all employees and patients. They have the overall purview of finished product, from logging in inventory as it arrives in the provisioning center, to accounting for cash receipts at the end of the day. They manage the inventory of the provisioning center and orders specific sorts of medical marijuana from the cultivation facility to insure adequate inventory. The provisioning center manager will work with the director of communications and community outreach coordinator to help understand what product segments are wanted by patients and to gather feedback as to the effectiveness of medical marijuana on treated conditions. This will lead to better patient outcomes and will result in overall growth to company. The provisioning center manager will be responsible for safe handling of medication, currency,
procurement of medication, inventory control and tracking, delivery manifests, oversight of the packaging room, loss prevention management, and product recall and while also trained to handle specific emergency situations. He/she is responsible for overall customer/patient experience implementing daily operational policy and procedures while being a liaison between the patient and company. The provisioning center manager and the director of operations are responsible for assuring that the facility is in compliance with all City and State regulations. The provisioning center manager will report to the CEO and CFO.

(7) Director of Communications: The Director of Communications is responsible for all internal and external communications for the dispensary and will position the provisioning center as the premier medical marihuana provisioning center in Michigan. External communications include creation of marketing materials, website posts and updates, and ensuring all materials comply with State regulations and laws. He/she is also responsible for all employee communications, including the creation of training materials and working with the CFO to promote retention in the workplace. The director of communications will work with the dispensary manager and community outreach coordinator to help organize patients outreach by various forms of communication. The director of communications works directly with the community outreach coordinator to host monthly meetings for the public to mitigate concerns in the immediate community.

(8) Medicine Tender: The medicine tender is the company's interface with the public. He/she is responsible for ensuring that all medical marihuana product dispensed inside the entity is done in a friendly, safe, and compliant manner. They are responsible for offering advice to patients on which products would best help treat their symptoms while directing the patient to the medical marihuana strain and corresponding potency. He/she can discuss the physical properties, effects, and treatments of medical marihuana that best fits the patient’s needs. He/she is responsible for confirming identity and qualification for receipt of medication. He/she is responsible for proper cash and product transactions, and ensuring each sale goes through the state certified point of sale system. After a patient has selected their medicine, the patient is brought to the check-out area where the provisioning center’s medicine tender will review the order for accuracy. The medicine tender will print the labels for each product and affix them in the proper compliant manner while processing the patient’s transaction. When educational material are requested, they will provide the necessary
paperwork for the ailment. He/she opens the store, checks inventory against the previous night’s closing inventory, reconciles cash at the end of the day, and insures that the sales have been properly entered into the point of sale system and that no patient information has been retained beyond what is allowed by law. They will dispense pre-packaged medical marijuana and will not have access to any inventory other than the inventory which is on site in security sealed child proof packaging. He/she works alongside security guard to facilitate patient transactions and to avoid theft. The provisioning center medicine tender reports to the provisioning center manager and works together with the director of communications and community outreach coordinator on patient education and product knowledge.

(9) Security: Security guards work with the security director and the medicine tenders. They are responsible for ensuring company facility, employees, patients and products are well secured in accordance with established procedures and policies. They will monitor and authorize entrance and departure of employees, visitors, vendors and other persons, asking for appropriate documentation in order to stop suspicious people and guard against theft. They are responsible for maintaining security of premises, conducting security checks, viewing security monitors, and reporting significant problems to authorities. They will complete scheduled security reports. They will maintain the provisioning center’s stability and reputation by complying with local, state laws and regulations. The security guard will have access to different types of methods needed to contact police, medical services, fire etc. when necessary.

(10) Patient Services and Education Specialist: The Patient Services and Education Specialist will meet with patients, assess their needs and actively engage them in developing a treatment and medication plan. Will compile and distribute all applicable informational and educational materials and disclosures, and will monitor the patient’s usage for signs of adverse effects or misuse. Receives comments and input from patients on a case by case basis, and conducts informal surveys of the patients for ratings as to service and satisfaction.

(11) Quality Assurance Specialist: The Quality Assurance Specialist is responsible for scales calibration and, to ensure all medicine is free from toxins, molds, pesticides and other impurities and acts as liaison with the testing laboratories. Responsible for product handling, including weighing and repackaging products for sale. Labeling and sealing all packaging. Maintaining cleanliness standards in the
handling of product. They are responsible for ordering packaging and labelling materials. Ensuring that such materials are not defective and that proper labelling and packaging of products is compliant with applicable state and city laws and ordinances.

(12) Inventory Control Specialist: The Inventory Control Specialist will assist the provisioning center manager in implementing and overseeing the inventory control system in coordination with METRC the approved inventory control vendor. Will monitor inventory counts. Assist in the review and revision of theft/diversion prevention procedures utilizing both the computerized inventory system and developing procedures in the handling of inventory and currency.

(13) Community Outreach Coordinator: The Community Outreach Coordinator will assist with the administration duties associated with patient sign-ups and community events. This role is primarily responsible for supporting the provisioning center in establishing community relationships, helping patients through the application process and prospecting new opportunities which will assist residents and improve the community. They will serve as a resource for patient calls and inquiries that come into the provisioning center. They will also provide support and organize seminars and workshops, sign-ups and community events. They will organize all necessary details for on-site events including allocating space, room setup, a/v requirements and materials. They will stay up to date with medical marihuana rules and regulations. They will serve as support for social media and electronic inquires. The Community Outreach Coordinator will develop and implement community outreach projects every month and coordinate different ways that employees, patients, and caregivers, can volunteer and/or contribute to the community. The Community Outreach Coordinator will act as an intermediate between the facility and the community. Their primary responsibility will be to increase the public image of the facility and the proper use of medical marihuana, as well as, assess and respond to any questions, issues and/or complaints from the community. Additionally the Community Liaison will be responsible for coordinating community beautification projects to help improve the surrounding area and neighborhood.

(14) Patient Advocacy Representative: Patient Advocacy staff will act as a liaison between patients, doctors and related resources. Patient advocacy is an area of specialization in healthcare concerned with the advocacy for patients and caregivers. The patient advocate may be an individual or organization, often, though not always, concerned with one specific group of disorders, illnesses or treatment solutions. The facility's patient advocate will work directly with the
Institutions that are responsible for the patient's care. Typical advocacy responsibilities include but are not limited to: patient rights, matters of privacy, confidentiality or informed consent, patient representation, awareness building, support and education of patients and their caregivers.

(15) **Bookkeeper:** Bookkeeper will be responsible for all accounts payable and accounts receivable, inventory management, tracking of purchasing and selling of medical marihuana by the business, taxes and any other financial matters such as employee payroll.

(16) **Receptionist:** Receptionist will handle all patient check-ins, visitor logs and field inbound phone calls. Additionally, the receptionist will organize all documentation in regard to patient, visitor and third-party information. Receptionist will maintain clear lines of communication with the manager on duty to advise them of any issues.

(17) **Secure Transportation:** Drivers will be responsible for the transportation of medical marihuana products from cultivation and manufacturing facilities to dispensaries. All product will be weighed, counted and fully documented in an electronic verification system. Drivers will collect a signed manifest of all deliveries. In the case of emergency, they will report the emergency immediately to law enforcement through the 911 emergency system located inside the transport vehicle.

(18) **Sanitation:** Sanitation will be in charge of cleaning the facility on a nightly basis to provide a clean and sanitary environment. They will be responsible for everything from mopping floors, emptying garbage, cleaning bathrooms, wiping down counters and phones.

(19) **Laboratory Testing:** The laboratory will be in charge of testing products from the facility to ensure they are free of mold, pesticides and other contaminants.

(20) **Legal Counsel:** Legal Counsel will be responsible for any and all aspects of legal issues that may arise for the business. Legal counsel will also assist in helping to maintain compliance, regulatory checks, audits, new document formation and any other legally binding paperwork which is necessary for the company to conduct business in full compliance with all laws and ordinances.
(21) Consultants: Consultants will act as the primary body ensuring this business is compliant with all federal, state, and local regulations. Additionally, consultants will help business owners to improve practices for operating a business and provide necessary advice to help ensure success.

(22) CPA: CPA will have complete oversight into all financial transactions for the business and be responsible for documenting and submitting any and all federal and state taxes on a yearly basis. The CPA will also assist in financial planning, investments, mergers, acquisitions, consulting, objective advice and assistance in both financial and strategic areas.

(A) Employees' Annual Compensation: Compensation refers to all forms of pay and rewards received by employees for performance in their jobs, including all forms of cash, benefits, services and perks. The provisioning center will strive to hire 100% of local residents whom will be paid above 150% of Michigan minimum state wage. The current minimum wage in Michigan is $8.90/hour. Households in Lansing, MI have a median annual income of $27,679, which is less than the median annual income in the United States. One hundred percent of our employees will be paid at $15 an hour or above. The importance of compensation will promote the attraction, retention and development of quality people. The total amount and type of compensation for the provisioning center is $676,145, not including those companies and individuals that have a 3rd party rate. Compensation is given in financial rewards that are either direct or indirect:

(1) Direct compensation:
   a) Wages and salaries.
   b) Starting pay rate far above minimum wage.
   c) Raises each a year based on work performance.
   d) Incentives.
   e) Bonuses and commissions.
   f) Tuition reimbursement.
(2) Indirect compensation:

(a) Workers Compensation.

(b) Health benefits.

(c) Vacation pay.

(d) Sick pay.

(e) Holiday pay.

(f) Promotion from within based on work performance.

(3) Pay scale table:

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Executive Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Chief Financial Officer</td>
<td>$65,000</td>
</tr>
<tr>
<td>Director of Operations</td>
<td>$54,163</td>
</tr>
<tr>
<td>Director of Security</td>
<td>$54,163</td>
</tr>
<tr>
<td>General Manager</td>
<td>$54,163</td>
</tr>
<tr>
<td>Provisioning Center Manager</td>
<td>$43,326</td>
</tr>
<tr>
<td>Director of Communications</td>
<td>$32,490</td>
</tr>
<tr>
<td>Medicine Tender</td>
<td>$31,200</td>
</tr>
<tr>
<td>Security</td>
<td>$37,440</td>
</tr>
<tr>
<td>Patient Services and Education Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Quality Assurance Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Inventory Control Specialist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Community Outreach Coordinator</td>
<td>$31,200</td>
</tr>
<tr>
<td>Patient Advocacy Representative</td>
<td>$31,200</td>
</tr>
<tr>
<td>Bookkeeper</td>
<td>$52,000</td>
</tr>
<tr>
<td>Receptionist</td>
<td>$31,200</td>
</tr>
<tr>
<td>Secure Transportation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Sanitation</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Laboratory Testing</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Legal Counsel</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>Consultants</td>
<td>Based on 3rd party rate</td>
</tr>
<tr>
<td>CPA</td>
<td>Based on 3rd party rate</td>
</tr>
</tbody>
</table>
(B) **Veterans Hiring Program:** The provisioning center’s veteran’s hiring program will recruit, retain, and employ veterans. Veterans and returning service members bring a unique skills set and experiences to the civilian workforce. Because of the training, work ethic and goal-oriented culture of the military, veterans not only make excellent employees, but also tend to have a higher rate of retention. Veterans bring with them the skills to do the job, in a timely and efficient manner. These skills such as leadership, management, teamwork, accountability and responsibility are qualities that can benefit our productivity.

(1) **Recruit:** The provisioning center will establish our job application process as Veteran-friendly. We will consider military service as a part of an applicant’s work history during the hiring process. Military service is an important part of an applicant’s background and can be a strong predictor of his or her ability to receive and respond to supervision and training. Leadership skills and leadership potential are also indicative of an applicant who has successfully completed his or her military obligation. We will request and utilize the DD214 as proof of service completion and hire without judgement. We will utilize the Military Occupational Classification code by entering at this code into the U.S. Department of Labor’s Occupational Information Network (O*NET) to locate a civilian equivalent job title.

(a) Our website will mention recruiting materials that our organization values the service Veterans and their family members have given to our country and that we support the hiring of returning service members and military spouses.

(i) On the "careers" portion of our website, we will include the following statements: If you are a Veteran and would like assistance with the employment process at The Provisioning Center, please contact us at [vetjobs@ourprovisioningcenter.com](mailto:vetjobs@ourprovisioningcenter.com).

(ii) If you are a Veteran and would like assistance with the employment process please RSVP and save the date to join our monthly Veterans Hiring Program every first Friday of each month.

(iii) We will actively recruit Veterans, Wounded Warriors and military by finding Veterans and instituting strategies to help Veterans connect with us. We will access credible resources to help locate qualified, local Veterans and wounded warriors who are seeking employment.

(2) **Retain:** We will promote within the workplace to retain our veteran employees. Retaining a skilled workforce requires effort after the hire. Retaining a veteran in the civilian workforce is not all that different than retaining other top talent. We will
ensure our Veteran's know and feel they are appreciated, respected and worthwhile to our team.

(a) We will place a value on military service. We will develop and promote peer mentorships in the workplace. We will practice public Veterans appreciation and promote a Veteran-friendly workplace. We recognize that military families may have different needs than civilian families and understand our responsibilities under USERRA.

(3) Employ: We will hire qualified, local Veterans and will accommodate Wounded Warriors. We understand our responsibilities under the Americans with Disabilities Act (ADA). We will network with these three organizations to create out Veteran employee recruitment pool.

(a) National Network Organization for Veterans, Community Service/Non-Profit, 1832 Briarwood Drive, Lansing, MI 48917, Phone number (517) 749-8735.

(b) Michigan Workforce Development Agency, Victor Office Center, 201 N. Washington Square, Lansing, MI 48913, Phone: 517-335-5858.


(l) Veterans will be referred to post their resume at the MITalent website.

(C) Ancillary Economic Anchor: The provisioning center will hire local contractors, cleaning companies, waste disposal companies and will acquire medical marijuana from cultivators located in Lansing to help stimulate the local economy. The marijuana industry is growing at such a fast pace and there are untold job opportunities related to medical marijuana. Some of these positions include promotion, photography, creative design, brand ambassador, reviewers, media and more. There are plenty of great opportunities. Marijuana business is just like a regular business. Specialty companies will be needed to ship, test, market, enforce, track, insure, construct, lobby, inspect in the medical marijuana industry. The need for marketing, accounting, sales, logistics and management positions are necessary.

(1) This list is composed primarily of common business categories that have decided to target the medical marijuana industry:

(a) Advertising.
(b) Compliance.

(i) Cleaning companies.

(ii) Contractors.

(iii) Waste Disposal Companies.

(c) Consulting.

(i) Technical Writers.

(d) Cultivation Products & Services.

(i) Nurseries.

(ii) Lighting equipment.

(iii) Ventilation equipment.

(iv) Pest Control.

(v) Culinary services.

(e) Extraction equipment.

(f) Lab Testing Services.

(g) Legal Professionals.

(i) Lawyers.

(h) IT/Software Professionals.

(i) Software Development.

(i) Media/Publishing/Events.

(i) Promotion.

(ii) Photography.
(iii) Graphic Design.

(iv) Creative Design.

(v) Review Writers.

(j) Marketing professionals.

(i) Digital Marketing.

(ii) Brand ambassador.

(k) Packaging.

(l) Payroll.

(m) Accounting.

(n) Staffing.

(o) Security professionals.

(p) Tourism.

**D** Worker Training Program and Promoting From Within The Company: The provisioning center team will be trained to represent the quality medicine and the outstanding service we provide. Worker training is essential for specific purposes related to the marihuana industry. There will be a worker training program that develops employees toward advancement in long-term career goals within our provisioning center. Learning and upgrading employee skills becomes successive as our employees grow but the long-term gains associated with employee training make a huge retention difference. The short-term expense of a worker training program ensures keeping qualified and productive workers who will share their knowledge with new hires. Here are some of the development initiatives:

(1) **Recruit & Hire:** The first step is hiring the right people for the right position. We are passionate about hiring veterans, they already come with a skills set learned while in military service. The hiring process identifies the job equivalent of the veterans who are the best fit employees for the provisioning center. The recruitment process is designed educate these veterans to move up within the legal marijuans industry.
The provisioning center is eager to invest in a long-term relationship with the veteran community to gain access to their unique skill sets.

(2) Provide Worker Training: The worker training program begins at the start of employment. We value the time educating the new hires about the marihuana industry, the various processes involved, and the medical marihuana culture. New workers will be introduced to core tasks early and will learn through experience.

(a) Training helps our business run better. Trained employees will be better equipped to handle customer inquiries, make a sale or use computer systems. Training is a recruiting tool. Today's young workers want more than a paycheck. They are geared toward seeking employment that allows them to learn new skills. You are more likely to attract and keep good employees if you can offer development opportunities.

(b) Training promotes job satisfaction. Nurturing employees to develop more rounded skill sets will help them contribute to the company. The more engaged and involved they are in working for our success, the better our rewards. Training is a retention tool, instilling loyalty and commitment from good workers. Staff looking for the next challenge will be more likely to stay if you offer ways for them to learn and grow while at our company. Don't give them a reason to move on by letting them stagnate once they've mastered initial tasks.

(c) Training adds flexibility and efficiency because we can easily cross-train employees to be capable in more than one aspect of the business. Teach them to be competent in sales, customer service, administration and operations. This will help keep them interested and will be enormously helpful when setting schedules or filling in for absences. Cross-training also fosters team spirit, as employees appreciate the challenges faced by co-workers.

(d) Training is essential for knowledge transfer. It's very important to share knowledge among our staff. If only one person has special skills, we'll have a tough time recouping their knowledge if they suddenly leave the company. We will spread knowledge around like diversifying our investments. Training gives seasonal workers a reason to return. Instead of hiring someone new, we offer our employees a chance to learn new skills and benefit from their experience with a possible promotion.

(3) Offer Continuous Learning & Development: The marihuana industry is becoming increasingly sophisticated both technical and medical, medicine tenders will need to ensure they are educated with the latest strains available and research on
marihuana. We aim not only invest in our knowledge capital for our company, but to increase loyalty through this investment in education too. The tasks that are assigned to each employee is intentional. We aim to monitor the frequency of tasks, hours involved, and productivity.

(4) Recognize Retention & Promote: Remember, if you help them grow their careers, they’ll help you grow your business. Everyone likes to have a sense of ownership of their work and to have that feeling that they are contributing to the company. Medicine tenders who aspire to dedicate their careers to the legal marihuana industry will likely be looking to progress in their jobs and learn over time. We will give them opportunities to step up to take leadership or ownership over certain tasks. Where we can, give as much autonomy to our medicine tenders on their projects to work towards a results-driven culture. As we seek to engage our employees through the training offered, education available, and a variety of tasks at hand we take some time to understand our employees’ career goals. While many love their work as medicine tenders, some may aspire to move up in the field or expand their involvement in the business. Nurture those dreams, and recognize talent early. Act as a mentor and show them some of the real challenges involved in ownership. We will promote from within when we can. We care about our employees’ careers as much as they do. Job performance, Reliability, Dependability, Punctuality, Frequency of missed days, Performance under stress, Ability to lead and ability to follow company guidelines are all factor when developing and considering an employee promotion. We offer an extensive training program, where new hires are not put onto the floor to help customers until they have completed a 2-week to 4-week training program. This ensures that they are educated on industry regulations, general marijuana information and have learned what types of products our store has available, along with the process of making each product.
### 1300.5(23) Annual Budget Revenue

#### Monthly Operating Budget

<table>
<thead>
<tr>
<th></th>
<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lease Payment</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Utilities</td>
<td>$300.00</td>
<td>$300.00</td>
<td>$300.00</td>
</tr>
<tr>
<td>Employee Salaries</td>
<td>$25,653.00</td>
<td>$25,653.00</td>
<td>$25,653.00</td>
</tr>
<tr>
<td>Manager Salaries</td>
<td>$30,692.00</td>
<td>$30,692.00</td>
<td>$30,692.00</td>
</tr>
<tr>
<td>Michigan Workmans Comp ($34.80 per $1,000)</td>
<td>$1,960.00</td>
<td>$1,960.00</td>
<td>$1,960.00</td>
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<tr>
<td>Employment Taxes (4.25% in MI)</td>
<td>$2,394.66</td>
<td>$2,394.66</td>
<td>$2,394.66</td>
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<tr>
<td>Office Supplies</td>
<td>$250.00</td>
<td>$500.00</td>
<td>$500.00</td>
</tr>
<tr>
<td>Advertising</td>
<td>$1,000.00</td>
<td>$2,500.00</td>
<td>$2,500.00</td>
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<tr>
<td>Insurance</td>
<td>$392.18</td>
<td>$392.18</td>
<td>$392.18</td>
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<tr>
<td>Security Monitoring</td>
<td>$80.00</td>
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#### Cost of Goods

<table>
<thead>
<tr>
<th></th>
<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost of Goods</td>
<td>$23,500.00</td>
<td>$47,000.00</td>
<td>$94,000.00</td>
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<tr>
<td>Internet</td>
<td>$200.00</td>
<td>$200.00</td>
<td>$200.00</td>
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<tr>
<td>Patient Services</td>
<td>$500.00</td>
<td>$750.00</td>
<td>$1,000.00</td>
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</table>

#### Total Per Month

<table>
<thead>
<tr>
<th></th>
<th>Year 1 Per Month</th>
<th>Year 2 Per Month</th>
<th>Year 3 Per Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Per Month</td>
<td>$89,421.84</td>
<td>$114,921.84</td>
<td>$162,171.84</td>
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<tr>
<td>Total Per Year</td>
<td>$1,073,062.08</td>
<td>$1,379,062.08</td>
<td>$1,946,062.08</td>
</tr>
</tbody>
</table>
### 1300.5(23) Annual Budget Revenue

#### Start Up Expense

<table>
<thead>
<tr>
<th>Item</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building Lease Deposit</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Building Lease</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Architect</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Licensing Fee</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Insurance Depo</td>
<td>$1,863.76</td>
</tr>
<tr>
<td>Tenant Improvements</td>
<td>$38,512.00</td>
</tr>
<tr>
<td>Tracking Equipment</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Office Equipment</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Furniture</td>
<td>$4,000.00</td>
</tr>
<tr>
<td>Security Equipment</td>
<td>$24,000.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$88,375.76</strong></td>
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#### Projected Revenue

<table>
<thead>
<tr>
<th></th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Patients Per Day</td>
<td>50</td>
<td>100</td>
<td>200</td>
</tr>
<tr>
<td>Average amount spent per patient</td>
<td>$70.00</td>
<td>$70.00</td>
<td>$70.00</td>
</tr>
<tr>
<td>Average Per Day</td>
<td>$3,500.00</td>
<td>$7,000.00</td>
<td>$14,000.00</td>
</tr>
<tr>
<td>Average Per Week</td>
<td>$24,500.00</td>
<td>$49,000.00</td>
<td>$98,000.00</td>
</tr>
<tr>
<td>Average Per Month</td>
<td>$98,000.00</td>
<td>$196,000.00</td>
<td>$392,000.00</td>
</tr>
<tr>
<td>Average Sales Per Year</td>
<td>$1,176,000.00</td>
<td>$2,352,000.00</td>
<td>$4,704,000.00</td>
</tr>
<tr>
<td><strong>Total Expense Per Year</strong></td>
<td><strong>$1,073,062.08</strong></td>
<td><strong>$1,379,062.08</strong></td>
<td><strong>$1,946,062.08</strong></td>
</tr>
</tbody>
</table>

**Net Profit**

$102,937.92  
$972,937.92  
$2,757,937.92
### 1300.5(23) Annual Budget Revenue

<table>
<thead>
<tr>
<th>Investment</th>
<th>Amount</th>
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</thead>
<tbody>
<tr>
<td>6 Months of Operating Expense @ $89,421.84</td>
<td>$536,531.04</td>
</tr>
<tr>
<td>Start Up Expense</td>
<td>$88,375.76</td>
</tr>
<tr>
<td>Total Investment</td>
<td>$624,906.80</td>
</tr>
</tbody>
</table>
EXHIBIT M
1. PURCHASER'S OFFER. The Undersigned Wells Fargo Funding LLC or any permitted Assignee [hereinafter called the PURCHASER], hereby offers to buy from SELLER through CBRE-MARTIN, the following property located in the City of Lansing, County of Ingham, State of Michigan, conveyance known as: Edgewood Commons 815 Edgewood Blvd., Lansing, MI, with a parcel identification number of 33-01-06-04-082-777 [hereinafter called the Property], subject to existing covenants and restrictions, zoning ordinances and easements, if any, of record, reasonably acceptable to PURCHASER, and under the following terms and conditions.

2. PURCHASE PRICE. The purchase price for the Property is Nine Hundred Thousand and 00/100 ($900,000.00) Dollars, subject to performance by SELLER of all closing obligations specified in Section 13 below.

3. TERMS OF PAYMENT. Terms of payment shall be as indicated by "X" below. (Other unmarked terms of purchase do not apply.)

4. SURVEY. Any new or updated survey shall be paid for by SELLER. Any new or updated survey shall be paid for by PURCHASER.

5. CLOSING ADJUSTMENTS. The following adjustments shall be made between the parties as of the close of business on the closing date, PURCHASER shall receive a credit or assume responsibility, as the case may be, for amounts attributable to time periods following the closing date:
   a. Prepaid rent and additional rent (as defined in this section);
   b. Interest of any existing indebtedness assumed by PURCHASER;
   c. Charges for any transferable service contracts assigned to PURCHASER described in Exhibit A;
   d. Security deposits.

6. SPECIAL ASSESSMENTS/BACKSTOPS.
   a. Special assessments which are or become a lien on the Property on or before the date of closing of this Agreement shall be paid by SELLER or before Closing.
   b. Special assessments which become a lien on the Property after the date of closing of this Agreement shall be paid by PURCHASER.

7. TITLE INSURANCE. All SELLER's expenses, PURCHASER shall provide PURCHASER with a standard ALTA owner's policy of title insurance with standard endorsements in the amount of the purchase price, effective as of the date of closing. Agreement to close is subject to the conditions that PURCHASER provide a commitment for title insurance acceptable to SELLER and PURCHASER has received title insurance from SELLER.

8. CONVEYANCE. Upon performance by PURCHASER of the closing obligations specified in Section 13 below, SELLER will convey the Property to PURCHASER by warranty deed, land contract or assignment, as specified in Section 11 above, subject to the tenancy of any existing tenants who have been disclosed to PURCHASER and PURCHASER's inspection within the 45 days of closing and acceptance of this Agreement.

9. WARRANTIES OF SELLER. Exculpation or otherwise provided or acknowledged in this Agreement, SELLER represents and warrants to PURCHASER as follows:
   a. SELLER's interest in the Property shall be transferred to PURCHASER on the closing date, free from liens, encumbrances, charges, claims or other, unless otherwise specified herein.
   b. Performance of the obligations of SELLER under this Agreement will not violate any contract, indenture, statute, ordinance, judgment or any administrative order or judgment applicable to SELLER or the Property.
   c. There is no litigation or proceeding pending, nor to the SELLER's knowledge threatened, against or involving the SELLER or Property, and the SELLER does not know or have reason to know of any ground for any such
This is to Certify that the ARTICLES OF ORGANIZATION (DOMESTIC L.L.C.)
for
WELLNESS LANSING, LLC

ID NUMBER:  F20416

received by facsimile transmission on June 16, 2017 is hereby endorsed.

Filed on June 22, 2017 by the Administrator.

This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.

In testimony whereof, I have hereunto set my hand and affixed the Seal of the Department, in the City of Lansing, this 22nd day of June, 2017.

Julia Dale, Director
Corporations, Securities & Commercial Licensing Bureau

Sent by Facsimile Transmission
MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU

Date Received

This document is effective on the date filed, unless a subsequent effective date within 90 days after received date is stated in the document.

Name
Randal Toma

Address
500 S. Old Woodward Ave., 2nd Floor

City
Birmingham

State
MI

ZIP Code
48009

EFFECTIVE DATE:

ARTICLES OF ORGANIZATION
For use by Domestic Limited Liability Companies
(Please read information and instructions on reverse side)

Pursuant to the provisions of Act 23, Public Acts of 1993, the undersigned executes the following Articles:

ARTICLE I
The name of the limited liability company is: Wellness Lansing, LLC

ARTICLE II
The purpose or purposes for which the limited liability company is formed is to engage in any activity within the purposes for which a limited liability company may be formed under the Limited Liability Company Act of Michigan.

ARTICLE III
The duration of the limited liability company if other than perpetual is:

ARTICLE IV
1. The name of the resident agent at the registered office is: Louie Elias
2. The street address of the location of the registered office is:
   8124 Parisien Dr., Sterling Heights, Michigan 48313
   (Street Address) (City) (State) (Zip Code)
3. The mailing address of the registered office if different than above:
   (P.O. Box or Street Address) (City) (State) (Zip Code)

ARTICLE V (Insert any desired additional provision authorized by the Act; attach additional pages if needed.)

Signed this 16 day of June 2017

By

(Randahl Toma, Attorney-In-Fact)

(Signature(s) of Organizer(s))

(Type or Print Name(s) of Organizer(s))

06/16/2017 1:33PM (GMT-04:00)