City of Lansing
Medical Marihuana Commission
Special Meeting
Tuesday, May 28, 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 5-17-19

4. Public Comment on Agenda Items

5. Commission Appeal Hearing
   a. Better Green – Parcel# 33-01-05-251-005 Enterprise Dr
   b. 3208 MLK Inc – 3208 S Martin Luther King Jr Blvd

6. New Business & Updates

7. Public Comment

8. Excuse Absences

9. Adjournment
Timeline
Better Green LLC
Parcel# 33-01-05-251-005
Enterprise Dr
Lansing, Michigan 48910

July 5, 2018 – Application Submitted & Department review of applications begins

December 16, 2018 – Insurance Policy Expires .............................................. 1

January 10, 2018 – Request for Conditional Approval ..................................... 2

January 10, 2018 – Request via Phone Calls for Ashleigh to be Main Contact

January 10, 2019 – Notification of Expiring Bond & Cancelled Insurance .......... 3

January 25, 2019 – Conditional Denial Letter Sent ......................................... 4

March 15, 2019 – Incomplete Application Denial Letter Sent ......................... 6

March 20, 2019 – Insurance Policy Submitted ................................................. 9

March 26, 2019 – Hearing Officer Appeal submitted ...................................... 10

April 15, 2019 – Second Incomplete Application Denial Letter Sent ............... 14

May 13, 2019 – Commission Appeal Submitted .......................................... 17

May 17, 2019 – Notification of Commission Date ......................................... 23

Documents excluded for intent to cure on appeal:

Insurance policy submitted March 20, 2019

Insurance policy submitted March 26, 2019
NOTICE OF CANCELLATION OR REFUSAL TO RENEW
550 W. Merrill Street • Suite 200 • Birmingham, MI 48009
248-559-0840 • Fax 248-559-0870

Policy Number: CICP017983
Policy Period: 02/06/2018 to 02/06/2019
Policy Type: CPP

Insured Name & Address
Better Green LLC
187 NOBLE ROAD
WILLIAMSTON, MI 48895

Date Mailed: 12/17/2018

YOUR POLICY IS CANCELLED
CANCELLATION DATE 12/16/2018 EFFECTIVE 12:01 A.M.

REASON FOR CANCELLATION / NON RENEWAL
99 Non Payment of Premium

AS OF THE PROCESS DATE SHOWN BELOW, PREMIUM DUE HAS NOT BEEN RECEIVED IN THIS OFFICE. YOU ARE HEREBY NOTIFIED THAT IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THE ABOVE MENTIONED POLICY THAT YOUR INSURANCE WILL CEASE AT AND FROM THE HOUR AND DATE MENTIONED ABOVE. IF THE AMOUNT PAST DUE IS RECEIVED AND ACCEPTED PRIOR TO, OR ON, THE DATE OF CANCELLATION, YOUR POLICY WILL BE REINSTATED WITHOUT A LAPSE OF COVERAGE.

[Signature]
AUTHORIZED REPRESENTATIVE

Process Date: 12/16/2018
Good morning.

Ashleigh Mishler called yesterday regarding the grow application for Better Green LLC. She said you asked her to call to have Gavin, her husband come in to sign paperwork for their conditionally approved grow.

Two points:

Better Green, LLC grow is not yet conditionally approved.
Ashleigh is not on the application.

Thank you.
Good morning.

Thank you for your insurance inquiry. Your Conditional Approval cannot be issued at this time for the following reasons:

Your liability insurance policy has been cancelled.
The submitted bond expires on 1/31/19.

Please submit proof of these two items for review. After approval of the newly submitted insurance and bond, Conditional Approval can be given.

If you no longer wish to receive a Medical Marihuana license from the City of Lansing, please submit your request for withdrawal of your application in writing to the City Clerk’s Office. The ordinance states that “Should the applicant not receive a license, one-half of the application fee shall be returned”. 1300.05(c)

As always, please feel free to contact me with any questions.

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
January 25, 2019

Better Green LLC
187 Noble Road
Williamston, MI 48895

Dear Medical Marihuana Applicant,

Please be advised that the City of Lansing has completed its review of applications as it relates to insurance, escrow accounts and surety bonds. Your application has been recommended for denial.

Ordinance sections 1300.5(b)(26) – (27) discuss the insurance requirements to obtain a Medical Marihuana license. You have either failed to submit the documents, or the documents you submitted failed 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. Submission of the Declaration page or an intent to purchase is not sufficient.

- Failure to insure adequately or the policy includes language that undermines the 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 additionally insured jointly and severally liable for premium payments.

- Failure to insure that the City of Lansing as an additional insured is notified 30 days in advance of insurance cancellation by the insurance carrier.

- Failure to provide evidence that the insurance policy underwriter has a minimum AM Best rating of B+.

- Failure to include a proper endorsement date

- Failure to provide either: (A) A fully executed surety bond in the amount of $50,000.00 with the City of Lansing listed as obligee or (B) evidence of an escrow account containing $20,000.00.

If you do not address any of these deficiencies 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 insurance, escrow account or surety bond materials and submit the required documents to the Clerk’s Office.

Sincerely,

Chris Swope, Master Municipal Clerk
Lansing City Clerk

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
Lansing City Clerk
Shipping Label Receipt

Delivery Confirmation™ Service Number:
9405 5116 9900 0598 4939 73

Priority Mail 2-DAY with USPS TRACKING#*
Electronic Service Fee: $0.000
Total Postage and Fees: $5.95
Weight: 1 oz
Print Date: 03/15/2019
Mailing Date: 03/15/2019

From: Chris Swope
Lansing City Clerk's Office
124 W Michigan Ave Floor 9
Lansing MI 48933-1612

To: Better Green LLC
C/O Gavin Misher
187 Noble Rd
Williamston MI 48895-9759

*Regular Priority Mail 2-DAY Service postage rates apply. There is no fee for Delivery Confirmation™ service on Priority Mail services with use of this electronic shipping label. Postmark required if fee refund is desired. Delivery information is not available by phone for the electronic option.

Instructions:

1. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secured. Self-adhesive label is recommended.
2. Place the label so it does not wrap around the edge of the package.
3. This package may be deposited in any collection box, handed to your mail carrier, or presented to a clerk at your local Post Office.
4. Each confirmation number is unique and can be used only once - DO NOT PHOTOCOPY.
5. You must mail this package on the *mail date* that is specified on this label.
March 15, 2019

Better Green LLC
187 Noble Road
Williamston, Michigan 48895

Dear Grow License Applicant,

This letter is to inform you that your application to operate a Medical Marihuana grow facility in the City of Lansing at Parcel # 33-01-05-251-005 (Enterprise Drive) has been denied.

You have failed to submit or maintain a liability insurance policy and a surety bond or an escrow account to demonstrate compliance with City of Lansing Ordinance 1300.5(26) and 1300.5(27).

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). You cannot correct the deficiency during the appeal process. Information not included with the original application will not be considered for the appeal.

Please note that initial appeals are referred to a hearing officer appointed by the City Clerk who will review any information submitted in the appeal as well as information submitted by the City Clerk. The hearing officer will consider the information submitted 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.

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 or you request the withdrawal of the application in a letter addressed to the Lansing City Clerk.
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
From: Ashleigh Mishler <ashleigh.mishler@yahoo.com>
Sent: Wednesday, March 20, 2019 4:47 PM
To: Biehler, Deb <Deb.Biehler@lansingmi.gov>
Subject: CICP020638 - Better Green LLC.pdf

Here is the entire insurance policy. I have a few other emails that will be coming your way. Thanks!

Better Green

Sent from my iPhone
Attached is our appeal, insurance policy and a surety bond for Better Green LLC. Please let me know if there is anything else you need from us. Thank you.

Sincerely,
Better Green

On Friday, March 15, 2019, 3:42:05 PM EDT, Biehler, Deb <Deb.Biehler@lansingmi.gov> wrote:

March 15, 2019

Better Green LLC
187 Noble Road
Williamston, Michigan 48895

Dear Grow License Applicant,

This letter is to inform you that your application to operate a Medical Marihuana grow facility in the City of Lansing at Parcel # 33-01-05-251-005 (Enterprise Drive) has been denied.

You have failed to submit or maintain a liability insurance policy and a surety bond or an escrow account to demonstrate compliance with City of Lansing Ordinance 1300.5(26) and 1300.5(27).

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). You cannot correct the deficiency during the appeal process. Information not included with the original application will not be considered for the appeal.
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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

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

Lansing City Clerk
Better Green LLC
Appeal

We as the owners of Better Green LLC, acknowledge that our companies liability insurance policy and a surety bond were allowed to expire. We have been treated very fairly and have been helped out very generously by Deb Beihler. We had purchased a one year policy and Better Green LLC partner and owner had his second child on 12-10-2018 and did not do a thorough job reading the emails sent by the city. Since Better Green LLC was issued the denial we have re-purchased owe insurance policy and a surety bond, and have attached a copy for the city to view. Better Green would like to appeal to the city on the grounds that it now has a valid insurance policy and a surety bond and are sincerely sorry for wasting the time of the city in this matter.
From: Chris Swope <no-reply@stamps.com>
Sent: Monday, April 15, 2019 12:00 PM
To: Biehler, Deb
Subject: [EXTERNAL] Chris Swope has sent you a package

This message was sent to you at the request of Chris Swope, to notify you that they have shipped a package to you. For details about your shipment or to track your package, please refer to the information below.

**Shipment Details**

**Shipped To:** Better Green LLC  
C/O Gavin Misher, 187 Noble Rd, Williamston, MI 48895-9759

**Mailing Date:** 4/15/2019

**Est. Delivery:** 2 days

**Service:** Priority Mail (R)

**Signature:** Not Required

**Tracking:** 240550178890009778893375

The shipment information contained in this email is provided by Stamps.com. For questions about this package, please contact Chris Swope or the U.S. Postal Service.

Easily print USPS shipping labels from your PC or Mac. At Stamps.com, our goal is to simplify shipping so you can focus on your business. Get started at [www.stamps.com](http://www.stamps.com).
April 15, 2019

Better Green LLC
187 Noble Road
Williamston, MI 48895

Dear Grower Applicant,

I have reviewed the report and recommendation of the hearing officer on your appeal of the denial of application to operate a Medical Marihuana grow facility in the City of Lansing at Parcel 33-01-05-251-005 on Enterprise Drive. I hereby do not adopt the hearing officer's recommendation as it violates the current practice of the City Clerk, which prohibits attempts to cure upon appeal. You were contacted several times by the City Clerk's Office about insufficient insurance, but failed to submit proper insurance prior to denial of licensure. Therefore, the documentation submitted to the City Clerk on March 26, 2019 cannot be considered.

The City of Lansing Ordinance 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: ... (26) Proof of an insurance policy covering the establishment and naming the City, its elected and appointed officials, employees, and agents, as additional insured parties, available for the payment of any damages arising out of an act or omission of the applicant or its stakeholders, agents, employees, or subcontractors, in the amount of (a) at least $1,000,000.00 for property damage; (b) at least $1,000,000.00 for injury to one person; and (c) at least $2,000,000.00 for injury to two or more persons resulting from the same occurrence. The insurance policy underwriter must have a minimum A.M. Best Company insurance ranking of B+, consistent with State law. The policy shall provide that the City shall be notified by the insurance carrier 30 days in advance of any cancellation." Failure to submit sufficient insurance results in a determination that the application submitted is incomplete. For these reasons, I have determined that 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.

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, CMMC
City Clerk

cc: M. Yankowski, Lansing Police Chief
    J. Smiertka, Lansing City Attorney
April 15, 2019

Better Green LLC
187 Noble Road
Williamston, MI 48895

Dear Grower Applicant,

I have reviewed the report and recommendation of the hearing officer on your appeal of the denial of application to operate a Medical Marihuana grow facility in the City of Lansing at Parcel 33-01-05-251-005 on Enterprise Drive. I hereby do not adopt the hearing officer’s recommendation as it violates the current practice of the City Clerk, which prohibits attempts to cure upon appeal. You were contacted several times by the City Clerk’s Office about insufficient insurance, but failed to submit proper insurance prior to denial of licensure. Therefore, the documentation submitted to the City Clerk on March 26, 2019 cannot be considered.

The City of Lansing Ordinance 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: . . . (26) Proof of an insurance policy covering the establishment and naming the City, its elected and appointed officials, employees, and agents, as additional insured parties, available for the payment of any damages arising out of an act or omission of the applicant or its stakeholders, agents, employees, or subcontractors, in the amount of (a) at least $1,000,000.00 for property damage; (b) at least $1,000,000.00 for injury to one person; and (c) at least $2,000,000.00 for injury to two or more persons resulting from the same occurrence. The insurance policy underwriter must have a minimum A.M. Best Company insurance ranking of B+, consistent with State law. The policy shall provide that the City shall be notified by the insurance carrier 30 days in advance of any cancellation.” Failure to submit sufficient insurance results in a determination that the application submitted is incomplete. For these reasons, I have determined that your appeal is denied.

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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

Deb Biehler
Lansing City Clerk Office Staff
2500 S. Washington Avenue
517.483.4485
MEMO

To: Chris Swope
   Lansing City Clerk

From: Mary Kay Scullion (P36237)

Re: Application of Better Green, LLC
    Parcel 33-01-05-251-005 on Enterprise Drive, City of Lansing

Date: April 10, 2019

Introduction and Background

The Application by Better Green LLC for a grow license was submitted to the Lansing City Clerk’s Office within the deadline for original applications. On March 15, 2019, the Lansing City Clerk advised Better Green LLC that its license application was being denied due to the lack of liability insurance, as required by Ord. 1300.5(27).

Applicable Ordinance Provision

Lansing City Ordinance 1300.5(26) and (27) require that potential licensees offer proof of liability insurance in the amount of $2 million plus a surety bond or performance bond in the amount of $50,000.

Analysis

It appears from the date of the documents submitted after the letter of denial was sent, that the surety bond was effective December 6, 2018. In contrast, the original liability insurance policy lapsed and was not in effect at the time of the review of the original application or subsequent requests for the missing documentation.

As noted above, Better Green, LLC was notified by the Lansing City Clerk that its application was being denied based on the lack of an effective liability insurance policy. In response Better Green LLC has now submitted documentation that the aggregate $2 million dollar liability insurance policy has been purchased and went into effect on March 19, 2019.

Recommendation: Assuming that all other conditions of the Application have been met and to the extent necessary are in effect, it is recommended that the Application be granted.

Mary Kay Scullion
Hi Deb,

I have attached a copy of our appeal. Please let me know if there is anything else I can do. Thank you.

Ashleigh Mishler
Better Green, LLC

On Monday, April 15, 2019, 1:16:06 PM EDT, Biehler, Deb < Deb.Biehler@lansingmi.gov > wrote:

April 15, 2019

Better Green LLC
187 Noble Road
Williamston, MI 48895

Dear Grower Applicant,

I have reviewed the report and recommendation of the hearing officer on your appeal of the denial of application to operate a Medical Marihuana grow facility in the City of Lansing at Parcel 33-01-05-251-005 on Enterprise Drive. I hereby do not adopt the hearing officer's recommendation as it violates the current practice of the City Clerk, which prohibits attempts to cure upon appeal. You were contacted several times by the City Clerk's Office about insufficient insurance, but failed to submit proper insurance prior to denial of licensure. Therefore, the documentation submitted to the City Clerk on March 26, 2019 cannot be considered.

The City of Lansing Ordinance 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: . . . (26) Proof of an insurance policy covering the establishment and naming the City, its elected and appointed officials, employees, and agents, as additional insured parties, available for the payment of any damages arising out of an act or omission of the applicant or its stakeholders, agents, employees, or subcontractors, in the amount of (a) at least $1,000,000.00 for property damage; (b) at least $1,000,000.00 for injury to one person; and (c) at least $2,000,000.00 for injury to two or more persons resulting from the same occurrence. The insurance policy underwriter must have a minimum A.M. Best Company insurance ranking of B+, consistent with State law. The policy shall provide that the City shall be notified by the insurance carrier 30 days in
advance of any cancellation." Failure to submit sufficient insurance results in a determination that the application submitted is incomplete. For these reasons, I have determined that 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.

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

Deb Biehler
Lansing City Clerk Office Staff
2500 S. Washington Avenue
517.483.4485
Better Green LLC
Appeal

We as the owners of Better Green LLC, acknowledge that our companies liability insurance policy and a surety bond were allowed to expire. We have been treated very fairly and have been helped out very generously by Deb Beihler. Since Better Green LLC was issued the denial we have re-purchased our insurance policy and a surety bond, and have attached a copy for the city to view. Better Green LLC, would like to appeal to the city on the grounds that it now has a valid insurance policy and a surety bond, that the city took longer than a year to view our application which allowed our policy to expire, and our first appeal was approved by the hearing officer and then later denied by Chris Swope. We Believe this to be arbitrary and capricious.

Thank you for your time in reviewing our Appeal.
This message was sent to you at the request of Chris Swope, to notify you that they have shipped a package to you. For details about your shipment or to track your package, please refer to the information below.

**Shipment Details**

Shipped To: Better Green LLC  
C/O Gavin Misher, 187 Noble Rd, Williamston, MI 48895-9759

Mailing Date: 5/17/2019

Est. Delivery: 2 days

Service: Priority Mail (R)

Signature: Not Required

Tracking: 8405814938090130525229

The shipment information contained in this email is provided by Stamps.com. For questions about this package, please contact Chris Swope or the U.S. Postal Service.
May 17, 2019

Better Green LLC
187 Noble Road
Williamston, MI 48895

Dear Medical Marihuana Grower Applicant:

Your appeal before the City of Lansing Medical Marihuana Commission will be held during a special meeting of the Commission on May 28, 2019, at 2:00 PM in the City Clerk Election Unit located at 2500 S Washington Avenue in Lansing.

Per Lansing City Ordinance 1300.3(e), the Commission’s review of the 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. The presentation timeline used by the Commission during the meeting for your appeal presentation is enclosed. No additional materials may be submitted for review.

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.

Sincerely,

Chris Swope
Chris Swope, Master Municipal Clerk
Lansing City Clerk
December 15, 2017 – Application submitted

December 21, 2017 – Department review of applications begins

January 30, 2018 – Initial Insurance Deficiency Letter to all Applicants ............... 1

June 11, 2018 – Conditional Denial Letter for Insurance Deficiencies ..................... 3

September 18, 2018 – All Applications Rescored for Category #14 ....................... 5

September 21, 2018 – All Applications Rescored for Category #18

March 8, 2019 – Score and Rank Denial Letter Sent ........................................ 7

March 21, 2019 – Hearing Officer Appeal submitted ........................................... 12

April 2, 2019 – Second Score & Rank Second Denial Letter Sent ............................ 126

April 22, 2019 – Commission Appeal Submitted ............................................... 140

April 25, 2019 – Commission Hearing Date Letter Sent .................................... 260

May 10, 2019 – Commission Hearing Date Rescheduled ................................... 262
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 11, 2018

3208 MLK Inc.
32411 Mound Rd
Warren, MI 48092

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 deficiencies were noted:

- The policy fails to list the City of Lansing as an additional insured.
- Please provide evidence that the policy underwriter has a minimum A.M. Best rating of B+.
- The City has not been provided with either a surety bond in the amount of $50,000 with the City of Lansing listed as obligee or evidence of an escrow account containing $20,000.

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
3208 S MLK is 537.5’ from the closest residential zoned property.
PRIORITY MAIL 2-DAY™

Chris Swope
Lansing City Clerk’s Office
124 W Michigan Ave Floor 9
Lansing MI 48933-1612

3208 MLK Inc.
32411 Mound Road
Warren MI 48092-3827

0004

Shipping Label Receipt

Delivery Confirmation™ Service Number:
9405 5116 9900 0474 6291 68

Priority Mail 2-DAY with USPS TRACKING #*
Electronic Service Fee: $0.00
Total Postage and Fees: $6.95
Weight: 1 oz
Print Date: 03/09/2019
Mailing Date: 03/09/2019

From:
Chris Swope
Lansing City Clerk’s Office
124 W Michigan Ave Floor 9
Lansing MI 48933-1612

To:
3208 MLK Inc.
32411 Mound Road
Warren MI 48092-3827

Instructions:

1. Adhere shipping label to package with tape or glue - DO NOT TAPE OVER BARCODE. Be sure all edges are secured. Self-adhesive label is recommended.
2. Place the label so it does not wrap around the edge of the package.
3. This package may be deposited in any collection box, handed to your mail carrier, or presented to a clerk at your local Post Office.
4. Each confirmation number is unique and can be used only once - DO NOT PHOTOCOPY.
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USPS TRACKING #

9405 5116 9900 0474 6291 68
March 8, 2019

3208 MLK Inc.
32411 Mound Road
Warren, Michigan 48092

Dear Provisioning Center Applicant,

The Lansing City Ordinance section 1300.6 discusses Provisioning Center license application evaluation. **Your score of 79 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 3208 South Martin Luther King Jr Blvd.

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 by the City Clerk. 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
Master Municipal Clerk
Lansing City Clerk

CC: City of Lansing Law Department
<table>
<thead>
<tr>
<th>Scoring Insights</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Marketing, Advertising and Promotion</td>
</tr>
<tr>
<td>Applicant provides several marketing, advertising and promotion examples and one minor prevention example (e.g., no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn’t get into much more detail. Lacks sufficient details and minor prevention examples.</td>
</tr>
<tr>
<td>2. Tangible Capital Investment in the City of Lansing</td>
</tr>
<tr>
<td>Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $300K, $1 million startup costs) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh). S/A UPDATE Changing the land contract from $300K to $200K does not impact the original score of 15 since the applicant indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh and does include a PC at 2117 S. Cedar Street.). Even taking into account the other PC, applicant still well above the $1 million TCI threshold. Suggestion: No change of the score is recommended. 3/5/2019 - Applicant does not provide any detail or supporting documents other than land contracts. There is no budget for the proposed property improvements, just a dollar amount. Their budget is 2 lines - one for projected income, one for projected costs. No explanation of either.</td>
</tr>
<tr>
<td>3. Job Creation (Integrated System) Overall number of jobs created</td>
</tr>
<tr>
<td>Applicant indicates 220 Lansing jobs will be created by their medical marijuana operations but does not provide much detail about them.</td>
</tr>
<tr>
<td>4. Financial Structure and Financing</td>
</tr>
<tr>
<td>Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and liquid assets availability of &gt; $1.65 million.</td>
</tr>
<tr>
<td>5. Plans to Integrate Facility with Other Establishments</td>
</tr>
<tr>
<td>Applicant indicates they intend to integrate their initial provisioning center with a 1,500 plant, 27,000 sq. ft. grow facility and other future operations.</td>
</tr>
<tr>
<td>6. Charitable Plans and Strategies</td>
</tr>
<tr>
<td>Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes, indicates they have been selected by Northern MI University to educate students (includes legal agreement form). Lacks proof of actual payment or an executed agreement.</td>
</tr>
<tr>
<td>7. Number of Jobs at the Provisioning Center Category Thresholds: 1 = &lt; 6 jobs, insufficient details; 2 = &lt; 6 jobs, sufficient details; 3 = 6 jobs, sufficient details; 4 = &gt; 6 jobs insufficient details; 5 = &gt; 6 jobs, sufficient/good details.</td>
</tr>
<tr>
<td>Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of clear details.</td>
</tr>
<tr>
<td>8. Amount and Type of Compensation (PC)</td>
</tr>
<tr>
<td>----------------------------------------</td>
</tr>
<tr>
<td>9. Percent of Employees Earning At Least $15/Hour (PC)</td>
</tr>
<tr>
<td>10. Projected Annual Budget and Revenue (PC)</td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
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<td>12. Business Experience</td>
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<tr>
<td>13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
</tr>
<tr>
<td>16. Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations,</td>
</tr>
<tr>
<td>18. Improvements made or proposed to building</td>
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<tr>
<td>19. Plan to minimize/eliminate traffic</td>
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<tr>
<td>20. Plan to minimize/eliminate noise</td>
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<tr>
<td>21. Plan to minimize/eliminate odor</td>
</tr>
<tr>
<td>22. LPD Complaints</td>
</tr>
<tr>
<td>23. Demo of Regulatory Compliance</td>
</tr>
<tr>
<td>24. Litigation History</td>
</tr>
</tbody>
</table>

Total Score | 100 | 73 |
In re: 3208 MLK INC.

Applicant

ADMINISTRATIVE APPEAL TO CITY CLERK
PURSUANT TO LANSING ORDINANCE 1300.15(C)

ACTION APPEALED FROM

3208 MLK Inc., a Michigan corporation ("Applicant") applied for licensing to operate a Medical Marihuana Provisioning Center at 3208 South Martin Luther King Jr. Blvd, Lansing, Michigan 48910 in December 2017. In November 2018, the Lansing City Clerk indicated the applicant had scored in the top 20 of the 87 applications that were received.

On March 8, 2019, the Lansing City Clerk notified the Applicant that their score of 79 out of 100 eliminated the possibility of scoring in the top twenty of the 87 applications that were received. The Applicant appeals the scoring of their application. (See Exhibit #1)

APPLICABLE ORDINANCE FOR REVIEW

1300.15 – LICENSE REVOCATION; BASES FOR REVOCATION; APPEAL OF 38 LICENSE DENIAL.

(C) APPEAL OF DENIAL OF AN APPLICATION OR REVOCATION OF A LICENSE: The city clerk shall notify an applicant of the reason(s) for denial of an application for a license or license renewal or for revocation of a license or any adverse decision under this chapter and provide the applicant with the opportunity to be heard. Any applicant aggrieved by the denial or revocation of a license or adverse decision under this chapter 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. The review on appeal of a denial or revocation or adverse action shall be by the commission pursuant to section 1300.3. Any decision by the commission on an appeal shall be final for purposes of judicial review. The clerk may engage professional experts to assist with the proceedings.
INTRODUCTION

The examiners awarded the Applicant a total score of 79 out of 100 points. The Applicant will address each category where a reduction from full point value was given. In each instance, the Applicant will clearly show that the examiner either did not score the category correctly, or overlooked the presented materials.

DISCUSSION

The Applicant’s Scoring on the City of Lansing Provisioning Center Ranking dated March 5, 2019 (Exhibit #1) numerates each scoring category and the presentation of this Statement will follow the same order in the Scoring.

1. MARKETING, ADVERTISING AND PROMOTION – MINIMIZATION OF EXPOSURE TO MINORS
   TOTAL POSSIBLE POINTS AVAILABLE: 4
   POINTS AWARDED: 2

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes indicate “Applicant provides several marketing, advertising and promotional examples and one minor prevention example (e.g. no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn’t get into much more detail. Lacks sufficient details and minor prevention examples.

DISCUSSION: To effectively market, advertise and promote a medical marijuana provisioning center, one must look beyond the traditional nods of print and digital advertisements. The Applicant’s Marketing Plan, contained in their Business Plan, actually listed multiple avenues to accomplish this goal. Marketing, advertising and promotion of a medical marijuana provisioning center involves much more than simply placing ads. Applicant would keep our corporate “brand” visible through sponsorship of community and industry causes (Business Plan - Page 12) (See Exhibit #2). 3208 MLK Inc. will be actively involved in community relations (Business Plan - Page 5) (See Exhibit #2). Applicant expects to partner with the local community and local coalitions to inform the community about medical cannabis issues (Business Plan - Page 10) (See Exhibit #2). Applicant will be providing classroom education to university students in conjunction with Northern Michigan University (Business Plan – Page 1) (See Exhibit #2). Applicant will be holding or participating in community meetings as part of our community outreach program (Business Plan - Page 10) (See Exhibit #2). Applicant will be holding education programs and workshops to benefit the community (Business Plan - Page 11) (See Exhibit #2). Applicant will be providing literature to all of our patients with our Patient Education Handbook (See Exhibit #3). Applicant would offer
community outreach and community benefit programs to the financially disadvantaged (Business Plan - Page 12) (See Exhibit #2). In this paragraph alone, Applicant has cited seven good examples of marketing and advertising that the examiner did not take into consideration when awarding the given score. There is no explanation why the Applicant deficiently addressed this point. Simply because the Applicant has chosen non-traditional methods does not mean the Applicant cannot be successful.

Our Business Plan – directed specifically to marketing, stated:

It is expected that 3208 MLK Inc. will spend over $70,000 annually for the first year using the following marketing options:

A. The proposed marketing plan starts with a proper Website with detailed information. 3208 MLK Inc. will utilize Search Engine Optimization (SEO optimization). SEO will position our website and will help eliminate exposure of any marketing or promoting marijuana products to minors.

B. 3208 MLK Inc. will hold business events and conferences. This will improve community relations by providing educating the public.

C. 3208 MLK Inc. will utilize alternative online advertising options including Mantis, 420 Network, 420 Click and Women Grow. These sites are known in the cannabis culture, again eliminating marketing exposure to children.

D. 3208 MLK Inc. will advertise in thematic magazines including Dope, Cannabis Now, 420 Magazine, Marijuana Venture and MG Magazine. This also allows for specific marketing to an adult target audience within the cannabis culture.

E. 3208 MLK Inc. will not market, advertise or sell ANY product that appeals to minor children such as “gummy bears.”

Our marketing plan not only includes advertisement placement, it included marketing from the inside out. Applicant would be hiring new employees as part of a marketing plan in addition to providing our work force (Business Plan - Page 7) (See Exhibit #2). Hiring local employees is beneficial for many reasons. Hiring from the local talent pool signals to customers and clients that you are a true citizen of the community. You are invested in its’ growth, the well-being of its’ citizens and the health of the local economy. Vetting candidates is easier. This may sound cynical, but local candidates are less likely to stretch the truth in their application materials. It’s easier to build a network that has a local foundation of employees. Customers want to work with people they know and trust. Finally, it equally important that local employees are less likely to leave their employment. The Applicant also detailed charitable endeavors that would be part of an overall marketing plan. These examples were also excluded from scoring.

As for minor prevention methods, first and foremost is that in order to gain admittance to our facility, the customer must show a valid patient/caregiver ID card and a valid state identification (Business Plan - Page 18) (See Exhibit #2). So not only does Applicant not market to youths, Applicant won’t sell to them as well. Applicant would be advertising in thematic magazine developed to target adults to minimize the possibility of advertising to minors (Business Plan – Page 5) (See Exhibit #2). Applicant would not market to, or
advertise any product that appeals to children – such as “gummy bears” (Business Plan – Page 5) (Exhibit #2). Again, in this paragraph, Applicant has cited 3 examples of minor prevention.

3208 MLK Inc. is one part of the FMJRL family of companies. Within the FMJRL family of companies, applications on behalf of two provisioning centers were submitted. For each provisioning center, the same materials were presented. By comparison, 2117 Cedar Inc. scored 3 points for this category while the Applicant only received 2 points. Using identical Business Plans, 2117 Cedar Inc. received 3 points while this Applicant received only 2 points. The same comments were made for both entities however 2117 Cedar Inc. received an extra point. (See Exhibit #4)

In conclusion, our Business Plan details SEVERAL marketing and minor prevention techniques. The fact that our Business Plan cites at least 7 examples of business advertising but only 2 are acknowledged demonstrates the award is not based on the materials submitted and a review of the record as a whole. For this category, the Applicant should have been awarded 4 points instead of 2 points.

02. TANGIBLE CAPITAL INVESTMENT IN THE CITY OF LANSING
TOTAL POSSIBLE POINTS AVAILABLE: 15
POINTS AWARDED: 12

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes indicate an original full-point score of 15 points citing a $27.8 million investment associated with integrated operations.

DISCUSSION: On March 5, 2019, the Applicant’s score was reduced by 3 points stating, “[the] Applicant does not provide any detail or supporting documents other than land contracts.” This is clearly an incorrect statement. The second page of a 175-page presentation outlined the budget breakdown and proposed master plan. Within the Applicant’s Budget are details for a grow facility, two processing facilities, a testing facility, a research and development facility, a secure transportation facility, and two provisioning centers. In total, the capital investment to the City of Lansing is estimated at $29,795,000. (See Exhibit #5).

For their budget, the Applicant clearly stated their expected investment expenditures for the first year (exclusive of the cost of real property acquisition) as:

- Expected Buildout Costs $700,000.00
- Security Equipment $50,000.00
- Legal Expenses $35,000.00
- Administrative Expenses $24,000.00
- Sales and Marketing $75,000.00

(Business Plan – Page 7) (See Exhibit #2)

Clearly, the Applicant’s materials have been overlooked (not simply expressed as one
line for projected income and one line for projected costs). For this category, the Applicant should have been awarded their original 15 points instead of 12 points.

03. JOB CREATION (OVERALL NUMBER OF JOBS CREATED)
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes disclose that the “Applicant indicates 240 Lansing jobs will be created by their medical marihuana operations but does not provide much detail about them.

DISCUSSION: The Applicant not only details the number of Lansing jobs to be created, the Applicant goes into particular detail about where and how such jobs would be created. In contrast to the Scoring Insight, the Applicant actually breaks down how the 240 jobs would be created, category by category. As “detailed” in our Business Plan, 3208 MLK Inc. expects to create 240 Lansing jobs. For our provisioning center personnel, 20 new jobs will be filled as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

This will account for 20 of the 240 jobs (Business Plan - Page 7) (See Exhibit #2). This also sets forth which jobs will be paid on an hourly basis and which jobs will be paid on a salary basis. As for the hourly rate, the Business Plan clearly delineates the fact that hourly employees will be paid between $15.00 - $50.00 per hour based on the job involved and the level of skill, education and experience of the employee. (Business Plan - Page 7)(See Exhibit #2).

The proposed build out of the provisioning center would add approximately 50 new construction employees (Business Plan - Page 7) (See Exhibit #2).

In addition, our Parent Company will be seeking licensing for a Medical Marihuana Grow facility, two Medical Marihuana Processing facilities, a Testing facility, a Transportation facility and a Research and Development facility, that will add another 220 new jobs to the Lansing economy (Business Plan - Page 7) (See Exhibit #2). Since our business plan involves hiring from the local talent pool, of the 270 total jobs created,
 Applicant estimated that 240 would come from the Lansing market, whether they are temporary, part-time or full-time.

For this category, the Applicant should have been awarded 5 points instead of 4 points.

7. NUMBER OF JOBS AT THE PROVISIONING CENTER
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes stated, “Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of detail.”

DISCUSSION: The Applicant has painstakingly addressed the number of jobs to be filled at their provisioning center. The Applicant has defined who they are, what role they will have, and how they will be compensated. As detailed in our Business Plan, Applicant expects to create several new Lansing jobs. For our provisioning center personnel, 20 new jobs will be filled as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

See Business Plan - Page 7 (See Exhibit #2). The proposed build out of the Provisioning Center would add approximately 50 new construction employees (Business Plan - Page 7) (See Exhibit #2).

The Medical Marijuana Provisioning Center Scoring Criteria that was originally made available to applicants in November 2017 (See Exhibit #7) indicated that a maximum of 5 points would be available based on the number of jobs created at the provisioning center. The Applicant indicated that 20 new jobs would be made available. Clearly the award of points would be on a sliding scale based on the number of jobs offered. Therefore, the minimum score for this category must be 4 points.

To earn the extra point, the Applicant has provided their business function and indicated how they are to be compensated. The Applicant’s Business Plan sets forth the identity of these new employees who would be employed directly at the facility, and also indicated
whether the employee would be paid on an hourly or salaried basis.

If the Applicant had simply stated they would hire 20 employees that would merit an award of 4 points. Since the Applicant not only set forth the number of employees they would hire, they identified the job each employee occupy and indicated whether that employee would be paid on an hourly or salaried basis. That provides sufficient detail to merit a full score of 5 points.

8. AMOUNT AND TYPE OF COMPENSATION
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 1

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes disclosed the following: “Applicant states that the provisioning center employees will earn between $15 and $50/Hour but does not provide an optimal amount of support detail.”

DISCUSSION: As detailed in our Business Plan, Applicant expects to have approximately 20 provisioning center employees. For our provisioning center personnel, the breakdown of those newly-created positions are as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

As can be readily seen, the first seven positions are salaried positions and would not be covered by the $15.00 - $50.00/hour rate (Business Plan - Page 7) (See Exhibit #2). These positions would be compensated based on education, experience and suitability for the position.

Along with Municipal Ordinance, in November 2017 the City Clerk published a Medical Marihuana Provisioning Center Scoring Criteria (See Exhibit #6) outline.

<table>
<thead>
<tr>
<th>Job creation</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of jobs at the provisioning center</td>
<td>5</td>
</tr>
<tr>
<td>Amount 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>
</tbody>
</table>
For the sub-category entitled “Amount and Type of Compensation”, there is no subjectivity to this scoring. The “amount of compensation” required a response indicating an amount. As for the type of compensation, the acceptable responses would have been either hourly or salaried.

The applicant clearly stated for their hourly employees, compensation will be paid at an hourly rate of between $15.00 and $50.00 per hour depending on the position and the relative experience of the employee. It is to be expected that employees working at the same position will earn different hourly amounts based on their skills and abilities. Hence the Applicant has stated a range of hourly rates depending on the employee ability and skill.

The “scoring insights” describing the deduction from full scoring as lacking “an optimal amount of support details”. This is inconsistent with the category itself. There is no subjectivity to the scoring of this sub-category. Again, the category did not ask for a description – simply an amount.

In conclusion, our Business Plan detailed exactly what was asked. For this category, the Applicant should have been awarded 2 points instead of 1 point.

10. PROJECTED ANNUAL BUDGET AND REVENUE
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 1

EXPLANATION GIVEN FOR POINTS AWARDED: The notes to the scoring reflect, “the Applicant provides a single line item number for annual budget and revenue (e.g. $1.02 million in expenses and 1.2 million in revenue) but no other information”. The “scoring insights” deducted 1 point as it “lacks sufficient details”.

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria (See Exhibit #6) for this variable were stated as follows:

<table>
<thead>
<tr>
<th>Job creation</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of jobs at the provisioning center</td>
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<td>Amount of compensation</td>
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<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>
</tbody>
</table>

The “projected annual budget and revenue” required a response indicating an amount. In good faith, the Applicant projected their annual revenue at $1,200,000. This was consistent with their size and proposed location.

For their budget, the Applicant first considered their total investment expenditures for the first year (exclusive of the cost of real property acquisition) as:

- Expected Buildout Costs: $700,000.00
- Security Equipment: $50,000.00
Legal Expenses $35,000.00
Administrative Expenses $24,000.00
Sales and Marketing $75,000.00

(Business Plan – Page 7) (See Exhibit #2)

When you factor in the costs for rent, utilities, salaries and other operating expenses, an annual budget of $1,020,000 is a realistic and calculated amount. Rather than arbitrarily selecting figures that might impress the reviewing authorities, the applicant has clearly stated an amount for annual revenue and expenses.

For this category, the Applicant should have been awarded 2 points instead of 1 point.

12. BUSINESS EXPERIENCE
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” deducted 1 point stating “the Applicant indicates they have 2+ years as a medical marijuana caregiver, plus decades of business experience (e.g. business management, pharmacy, bookkeeping). Lacks the optimal amount of applicable business experience.

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria for this variable were stated as follows:

<table>
<thead>
<tr>
<th>Business Experience</th>
<th>History of success in operating business or businesses, years of operation, relevant business experience, other commercial licenses, medical certifications, and/or licenses.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>5</td>
</tr>
</tbody>
</table>

For cumulative experience, the Applicant has 10 years experience. Joseph Aiello has five years experience in medical marijuana (City of Ferndale municipal licensing issued in 2014), Frank Mastroianni has two years medical marijuana experience with his medical marijuana facility in Warren, Margaret Carter has 2+ years experience as a medical marijuana patient, and Sara Mokoski has 1 year experience as a medical marijuana patient. These facts were clearly set out in the Resume re Marihuana Experience (See Exhibit #7).

This is in addition to the “decades of business experience” running multi-million-dollar entities. For almost 20 years, Joseph Aiello was a design engineer for Ford Motor Company, General Motors and Chrysler Corporation. For 10 years, he managed government contracts with the United States Army. He manages his own multi-million dollar engineering company (Manatee Engineering Services).

His partner, Frank Mastroianni, has more than 10 years experience in the real estate construction field and more than 15 years experience in the real estate sales market. Mr.
Mastroianni was granted a municipal license in Warren to operate a medical marihuana facility.

For this category, the Applicant should have been awarded 5 points instead of 4 points.

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13. CONTENT AND SUFFICIENCY OF INFORMATION; PROFESSIONALISM OF SUBMITTED DOCUMENTATION INCLUDING CLEAR LABELING OF REQUIRED ITEMS
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate “lacks detail in jobs, budget, TLC.”

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria examines the overall presentation of the materials submitted by the Applicant. The Applicant submitted over 175 pages of material, with color illustrations, in a bound folder. On the exterior of the folder was an artist rendering of the proposed facility. There was a Table of Contents with tab dividers to allow easy access to any portion of the application. There was a budget breakdown including a proposed Master Plan for the various medical marihuana facilities sought by the Applicant’s parent company (FMJRL, Inc.)

The Scoring Criteria evaluated: (1) Ownership structure, (2) Organizational chart, (3) Worker training program, (4) Short-term and long-term goals and objectives, and (5) Community outreach & education. The “scoring insights” had the following remarks - “Table of Contents, org chart, short and long term goals & outreach”. The “scoring insights” addressed each of the scoring criteria and noted the application met or exceeded the requested items.

For this category, the Applicant should have been awarded 5 points and not 4 points.

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14. BUFFERING BETWEEN RESIDENTIAL ZONED AREAS AND ESTABLISHMENT
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 3

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” deducted 2 points indicating the property was located 535 feet from residential zoning which falls short of the optimal distance of ¼ mile (1320 feet) to receive full points.

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria for this variable were stated as follows:

Impact on neighborhood Buffering between residential zoned areas and establishment 5
The buffering of a Medical Marijuana Provisioning Center was set forth by the municipal ordinance, stating as follows:

1300.13 – LOCATION, BUFFERING, DISPERSION, AND ZONING REQUIREMENTS FOR OF MEDICAL MARIHUANA PROVISIONING CENTERS.

(A) EXCEPT IN ACCORDANCE WITH SECTION 1300.18, FOR BUFFERING AND DISPERSION PURPOSES, NO MEDICAL MARIHUANA PROVISIONING CENTER SHALL BE LOCATED WITHIN:

(1) ONE THOUSAND (1000) FEET, OF AN OPERATIONAL SCHOOL, INCLUDING PRE-KINDERGARTEN THAT IS LOCATED WITHIN A SCHOOL; OR

(2) FIVE HUNDRED (500) FEET, OF THE FOLLOWING BUFFERED USES: PUBLIC PLAYGROUND EQUIPMENT LOCATED IN A PARK; A COMMERCIAL CHILD CARE ORGANIZATION (NON-HOME OCCUPATION) THAT IS REQUIRED TO BE LICENSED OR REGISTERED WITH THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES, OR ITS SUCCESSOR AGENCY, A CHURCH; A FACILITY AT WHICH SUBSTANCE ABUSE PREVENTION SERVICES OR SUBSTANCE ABUSE TREATMENT AND REHABILITATION SERVICES AND THOSE TERMS ARE DEFINED IN PART 61 OR PA 368 OF 1978, MCL 333.6101 ET SEQ., ARE OFFERED; OR ANOTHER MEDICAL MARIHUANA PROVISIONING CENTER.

(B) MEDICAL MARIHUANA PROVISIONING CENTERS SHALL BE LIMITED TO F AND F1-COMMERCIAL, G2-COMMERCIAL, H-LIGHT INDUSTRIAL, AND I-HEAVY INDUSTRIAL AS SUCH DISTRICTS ARE DESCRIBED AND DESIGNATED AS PROVIDED IN THE ZONING CODE PROVISIONS OF THE LANSING CODIFIED ORDINANCES.

(C) NO MEDICAL MARIHUANA PROVISIONING CENTER SHALL BE LOCATED WITHIN ANOTHER BUSINESS EXCEPT AS PERMITTED BY THE MEDICAL MARIHUANA LICENSING BOARD REGULATIONS.

The scoring criteria focus uses the phrase “residential zoned areas” (plural). A plain reading of the scoring criteria and the applicable ordinance must therefore focus on the enumerated factors in the ordinance itself – (Ordinance 1300.13(A)) setbacks from schools, libraries, playgrounds, childcare, churches and substance abuse prevention centers. Clearly setbacks for schools, libraries, playgrounds, childcare facilities, places of worship and substance abuse prevention centers relate to residential-related services (as opposed to commercial-related services). If the scoring criteria was made known that location to residential housing would be considered, the Applicant would not have bought property in that area and would not have submitted an application for licensing at that location.
Verified by submitted maps measuring the distances, the Applicant satisfied all of the stated buffering requirements: (see Location and Distance from Buffered Areas) (See Exhibit #9)

<table>
<thead>
<tr>
<th></th>
<th>Allowed Distance</th>
<th>Actual Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
<td>1,000 feet</td>
<td>4,127 feet</td>
</tr>
<tr>
<td>Library</td>
<td>500 feet</td>
<td>4,787 feet</td>
</tr>
<tr>
<td>Playground</td>
<td>500 feet</td>
<td>3,934 feet</td>
</tr>
<tr>
<td>Commercial childcare</td>
<td>500 feet</td>
<td>1,834 feet</td>
</tr>
<tr>
<td>Church</td>
<td>500 feet</td>
<td>1,861 feet</td>
</tr>
<tr>
<td>Substance abuse prevention</td>
<td>500 feet</td>
<td>1,719 feet</td>
</tr>
</tbody>
</table>

A comparison of the actual distances with the setback distances show the following multiplied distances from the required setbacks:

<table>
<thead>
<tr>
<th></th>
<th>Actual Distance</th>
<th>Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
<td>1,417 feet</td>
<td>4.12 times</td>
</tr>
<tr>
<td>Library</td>
<td>5,833 feet</td>
<td>9.57 times</td>
</tr>
<tr>
<td>Playground</td>
<td>1,696 feet</td>
<td>7.86 times</td>
</tr>
<tr>
<td>Commercial childcare</td>
<td>1,115 feet</td>
<td>3.67 times</td>
</tr>
<tr>
<td>Church</td>
<td>1,030 feet</td>
<td>3.72 times</td>
</tr>
<tr>
<td>Substance abuse prevention</td>
<td>2,762 feet</td>
<td>3.44 times</td>
</tr>
</tbody>
</table>

From the foregoing chart, the Applicant is located at least three and one-half times the distance to the nearest setback. Again, residential zoning is not an enumerated setback.

The “scoring insights” indicate the establishment is located 535 feet from residential zoning. According to the Applicant’s calculations (See Exhibit #9), the nearest residential property is located 862 feet to the North and 986 feet to the West of the Applicant’s facility using the measurement tool prescribed by the Clerk.

By comparison, another Applicant, Green Square Holdings LLC received 3 points for being 224 feet. (See Exhibit #10) This Applicant, located at four times further away, received the same score.

For this category, the Applicant should have been awarded at least 4 of 5 points.

15. INCREASED TRAFFIC ON SIDE STREETS WILL BE SCORED LOWER
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate a shared driveway, updated 9/25/18 inadequate in driveways & circulation (change in score)

DISCUSSION: The objective of this category is to deter a flow of traffic onto side
streets and potentially into residential neighborhoods. There is no traffic onto any side streets. The Applicant’s facility has only one source of ingress/egress — onto Martin Luther King Jr. Blvd. As demonstrated in the Applicant’s Site Plan (Exhibit #10) there are 21 available parking spaces that face the Applicant’s facility including 4 spaces designated for handicap parking.

As for the other facilities, there is no indication their use of a shared driveway would impact the customer’s ability to enter or exit onto South Martin Luther King Jr. Blvd. The driveway for ingress/egress is a double driveway with the commercial property to the North that would not restrict the flow of traffic on South Martin Luther King Jr. Blvd. (Exhibit #11)

For this category, the Applicant should have been awarded at least 4 of 5 points.

16. ENTRANCE AND EXIT ON MAIN STREETS, ADEQUATE PARKING NOT ON RESIDENTIAL STREETS, QUALITY OF SECURITY PLAN
TOTAL POSSIBLE POINTS AVAILABLE: 10
POINTS AWARDED: 6

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate Tier 2, 2 pts. for Security Plan, Tier 2, traffic 4 pts, strong traffic patterns and parking. Update 9/25/18 inadequate in driveways & circulation (change in score)

DISCUSSION: To address the entrance and exit on main streets, the facility faces South Martin Luther King Jr. Blvd and the only way to enter or exit the property is directly onto South Martin Luther King Jr. Blvd. Therefore, there should have been no deductions based on the ingress/egress onto any side streets as there are no adjacent side streets.

Again, FMJRL (Applicant’s parent company) presented applications on behalf of two Medical Marihuana Provisioning Centers — 2116 Cedar Inc. and 3208 MLK Inc. Both entities submitted the same Security Plan. By comparison, 2117 Cedar Inc. was awarded 7 points. That can only indicate the one-point variance has to do with the adequacy of parking since all of the other factors are the same.

To address the adequacy of parking has 21 available parking spaces that face the Applicant’s facility including 4 spaces designated for handicap parking. Under the Americans with Disabilities Act (ADA), the minimum number of accessible parking spaces depends on the total number of parking spaces in the lot. Where there are less than 26 spaces, only one space is required to be accessible. This Applicant has set forth 4 available accessible spaces in the Applicant’s Site Plan (See Exhibit #11).

As noted by the examiners, there are commercial establishments to the immediate North and South and there is no exit from the rear of the facility. The only way to enter or exit the facility is onto South Martin Luther King Jr. Blvd. As such, there can be no parking on residential side streets and no basis for a one-point variance between the two facilities.
As for the Applicant’s Security Plan, video cameras are kept off site with cloud storage. There will be biometric controlled access to secure areas. The safe is a Cannon Wide Body 64-Gun Safe that is not located on an exterior wall (diagramed in the Applicant’s Floor Plan) to prevent crash and dash entry. The alarm system is monitored by Nest. There will be on-site security. Finally, the medical marihuana is ordered and delivered using a Zivelbo kiosk system to monitor product purchases.

For this category, there is no basis for a 4-point deduction to the Applicant’s score.

24. BUSINESS LITIGATION HISTORY
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 0

EXPLANATION GIVEN FOR POINTS AWARDED: All stakeholders have a complete litigation history with no or minimal issue. It does not include personal history. Updated 11/28/18 after further review, “no record of acts of detrimental to security, safety, morals ... is determined insufficient.”

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria (See Exhibit #6) for this variable were stated as follows:

<table>
<thead>
<tr>
<th>Applicant/stakeholders</th>
<th>Lansing Police Department complaints/incidents</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>record of acts detrimental to security, safety, morals</td>
<td>Demonstration of regulatory compliance</td>
<td>2</td>
</tr>
<tr>
<td>good order, general welfare</td>
<td>Business litigation history</td>
<td>10</td>
</tr>
</tbody>
</table>

The category requests information regarding business litigation history. The Ordinance in question - 1300.6(B)(4) states the following:

(4) Whether the applicant or any of its stakeholders have a record of acts detrimental to the public health, security, safety, morals, good order, or general welfare prior to the date of the application; Whether the applicant or any of its stakeholders have previously operated an illegal business of any kind, including any violation of Lansing Medical Marihuana Moratoriums. The maximum number of scoring points in this category shall be ten (10) points;

To address this requirement, the Applicant submitted a statement containing the following:

FRANK MASTROIANNI, states the following:

1. I am a Director of 3208 MLK Inc. and have the authority to issue this statement.

2. The Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation has submitted an Application for a Medical Marihuana
Licensure to operate a provisioning center at 3208 Martin Luther King Jr. Blvd, Lansing, Michigan 48910.

3. The Applicant and the stakeholders of the Applicant have no record of acts detrimental to security, safety, morals, good order or general welfare.

4. The Applicant and the stakeholders of the Applicant have no record of any complaints or incidents with the Lansing Police Department.

5. The Applicant and the stakeholders of the Applicant have no record of any business litigation history.

6. The Applicant has committed no violations of the 2016 Ordinance #1202 Moratorium.

(See Exhibit #14).

The Applicant has directly complied with the Ordinance, responded questions asked by the Ordinance and received zero points. Clearly Paragraph 5 indicates the Applicant and the Stakeholders have no record of any business litigation history. If you provide the information requested, how can that be construed as “insufficient”?

For this category, the Applicant should have been awarded 2 points instead of 0 points.

CONCLUSION

The Applicant has addressed each category where a reduction from full point value was given. In each instance, the Applicant has clearly shown that the examiner either did not score the category correctly or overlooked the materials presented.

Based on the foregoing, a correction must be made awarding the applicant additional points.

Respectfully,

Aaron D. Geyer
Attorney for Applicant

Prepared by
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Fax. (586) 303-1259
aaron@chrisaiello.com
EXHIBITS

TABLE OF CONTENTS

1. Denial Letter from Lansing City Clerk with Application Scoring (received 03/08/19)

2. Applicant’s Business Plan (originally submitted)

3. Patient Education Handbook (originally submitted)

4. Application Scoring for 2117 Cedar Inc. (dated 1/16/2019)

5. Budget Breakdown (originally submitted)


7. Applicant’s Resume Regarding Experience with Medical Marihuana or a Related Industry

8. Location and Distance from Buffered Areas

9. Maps showing distance to nearest residential zoning. (Not being offered as new evidence but introduced to rebut a false statement)


11. Applicant’s Site Plan

12. Photo showing Applicant’s parking lot. (Not being offered as new evidence but introduced to rebut a false statement)
13. Applicant's Land Use and Effect on Traffic Patterns.

<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>3208 MLK INC</th>
<th>3208 MLK INC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>---</td>
<td>3208 S MARTIN LUTHER KING JR BLVD</td>
<td>3208 S MARTIN LUTHER KING JR BLVD</td>
</tr>
</tbody>
</table>

### Scoring Insights

1. **Marketing, Advertising and Promotion**

   - **Score:** 4
   - **Score:** 2
   - Applicant provides several marketing, advertising and promotion examples and one minor prevention example (e.g., no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn’t get into much more detail. Lacks sufficient details and minor prevention examples.

2. **Tangible Capital Investment in the City of Lansing**

   - **Score:** 15
   - **Score:** 12
   - "Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $300K, $1 million startup cost) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including >$2 million for R&D property at 1520 E. Cavanaugh). 9/4 UPDATE: Changing the land contract from $300K to $200K does not impact the original score of 15 since the applicant indicates $27.8 million investment associated with integrated operations (including >$2 million for R&D property at 1520 E. Cavanaugh and Does include a PC at 2137 S. Cedar Street). Even taking into account the other PC, applicant still well above the $1 million TCI threshold. Suggestion: No change of the score is recommended.

3. **Job Creation (Integrated System) Overall number of jobs created**

   - **Score:** 5
   - **Score:** 4
   - Applicant indicates 220 Lansing jobs will be created by their medical marijuana operations but does not provide much detail about them.

4. **Financial Structure and Financing**

   - **Score:** 3
   - **Score:** 3
   - Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and liquid assets availability of > $1.65 million.

5. **Plans to Integrate Facility with Other Establishments**

   - **Score:** 2
   - **Score:** 2
   - Applicant indicates they intend to integrate their initial provisioning center with a 1,500 plant, 27,000 sq. ft. grow facility and other future operations.

6. **Charitable Plans and Strategies**

   - **Score:** 4
   - **Score:** 3
   - Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes, indicates they have been selected by Northern MI University to educate students (includes legal agreement form). Lacks proof of actual payment or an executed agreement.

7. **Number of Jobs at the Provisioning Center Category Thresholds:**

   - **Score:** 5
   - **Score:** 4
   - Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of clear details.
<table>
<thead>
<tr>
<th></th>
<th>Amount and Type of Compensation (PC)</th>
<th>2</th>
<th>1</th>
<th>Applicant states that the provisioning center employees will earn between $15 and $50/hour, but does not provide an optimal amount of support details.</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.</td>
<td>Percent of Employees Earning At Least $15/Hour (PC)</td>
<td>3</td>
<td>3</td>
<td>Applicant indicates that all of the hourly positions will be paid no less than $15/hour.</td>
</tr>
<tr>
<td>10.</td>
<td>Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>1</td>
<td>Applicant provides a single line item number for annual budget and revenue (e.g., $1.02 million in expenses and $1.2 million in revenue) but no other details. Additional information about Capital Bank (e.g., $3 million in annual revenue, etc.) is confusing since not made clear how it relates to the provisioning center. Lacks sufficient clear details.</td>
</tr>
<tr>
<td>11.</td>
<td>Sufficient Financial Resources</td>
<td>5</td>
<td>5</td>
<td>Applicant provides litigation compliance verification forms for all stakeholders. Applicant proves they have well over $100,000 in the bank and over $1 million in liquid assets.</td>
</tr>
<tr>
<td>12.</td>
<td>Business Experience</td>
<td>5</td>
<td>4</td>
<td>Applicant indicates they have 3+ years as a medical marijuana caregiver, plus decades of business experience (e.g., business management, pharmacy, book keeping). Lacks the optimal amount of applicable business experience.</td>
</tr>
<tr>
<td>13.</td>
<td>Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
<td>5</td>
<td>4</td>
<td>Lack of detail in jobs, budget, TCI.</td>
</tr>
<tr>
<td>14.</td>
<td>Buffering between residential zoned areas and establishment</td>
<td>5</td>
<td>3</td>
<td>Inadequate barriers. Not close residential. Updated score using a better measurement tool 9/17/18 approx 335 ft from residential zoning which falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.</td>
</tr>
<tr>
<td>15.</td>
<td>Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td>4</td>
<td>Shared drive. Updated 9/25/18 inadequate in driveways &amp; circulation (change in score)</td>
</tr>
<tr>
<td>16.</td>
<td>Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</td>
<td>10</td>
<td>6</td>
<td>Tier 2: 2 pts Minimum requirement for Sec plan. Tier 2, traffic 4 pts, strong traffic patterns and parking updated 9/25/18 inadequate in driveways &amp; circulation (change in score)</td>
</tr>
<tr>
<td>17.</td>
<td>Plan to meet with neighborhood organizations,</td>
<td>1</td>
<td>1</td>
<td>Community plan to meet with neighbors</td>
</tr>
<tr>
<td>18.</td>
<td>Improvements made or proposed to building</td>
<td>3</td>
<td>3</td>
<td>Final plans not yet submitted or approved for improvements. Updated 9/21/18 Using a more accurate measurement tool, $700,000 in buildout costs which is 327% of SEV $214,100 which is above the optimal 125% SEV investment amount</td>
</tr>
<tr>
<td>19.</td>
<td>Plan to minimize/eliminate traffic</td>
<td>1</td>
<td>1</td>
<td>Traffic plan included</td>
</tr>
<tr>
<td>20.</td>
<td>Plan to minimize/eliminate noise</td>
<td>2</td>
<td>2</td>
<td>Detailed Plan to reduce traffic to reduce noise, block wall or fencing</td>
</tr>
<tr>
<td>21.</td>
<td>Plan to minimize/eliminate odor</td>
<td>3</td>
<td>3</td>
<td>Detailed Bokashi compost plan</td>
</tr>
<tr>
<td>22.</td>
<td>LPD Complaints</td>
<td>4</td>
<td>4</td>
<td>1 Assault report - 1 harassing phone call report - 1 other Report - 5 B&amp;E alarm - 1 MOOP call - 2 susp. Person call - 4 check welfare - 1 larceny call - 1 prostitution report - 4 unwanted - This may be logan square, 21 calls (9 calls drops score to 1 pt) 12/26/2018 Not currently operating at this location. Location in a strip mall.</td>
</tr>
<tr>
<td>23.</td>
<td>Demo of Regulatory Compliance</td>
<td>4</td>
<td>4</td>
<td>Updated 9/25/18 No tax issues</td>
</tr>
<tr>
<td>24.</td>
<td>Litigation History</td>
<td>2</td>
<td>0</td>
<td>All stakeholders have a complete business litigation history with no or minimal issue. It does not include personal history. 11/26/2018 Updated 11/28/18 after further review, &quot;no record of acts of detrimental to security, safety, morals,&quot; is determine insufficient.</td>
</tr>
</tbody>
</table>

Total Score: 100 79
EXHIBIT 2
BUSINESS PLAN

This is the written BUSINESS Plan for 3208 MLK Inc. ("We", "Us", "Our"). This plan addresses and meets the application requirements of the City of Lansing's Medical Marihuana Ordinance for the regulation and licensing of Medical Marihuana Establishments.

1. Executive Summary – Mission Statement

The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients. We want to provide greater access to the medicinal effects cannabis can bring to those in need. At 3208 MLK Inc., we will always put our patients first. Our staff is knowledgeable of industry and licensing regulations. We continually attend industry seminars and workshops to stay current with evolving regulations. We are here to service the community properly, now and in the future.

It's one thing to say we will have community involvement, it's another thing to back up those words and promises with FACTS. We have been selected by a major university, Northern Michigan University, to provide programs to students directly related to the medical marijuana industry. We will be providing classroom education to students in the fields of medical marihuana growing, cultivation, processing, and dispensary operations.

Our dispensary will provide our patients with safe products, professionally packaged, and presented in a compassionate, service-focused way in a comfortable setting by well-trained staff. Patient care and education is a key element of our approach, and has to be part of an array of wellness and support services (transportation, interpreters, and care advocates) we offer our patients.

Our dispensary is being designed and built to feature state of the art technology with forward-looking green practices. Security and safety are critical components of our operations. We also plan to take every effort to be "good neighbors" in the community. This means providing extensive community outreach, including hiring and public involvement. It also means minimizing any negative impacts or nuisances that may arise from our operations.

Our key objectives are:

- To provide safe and legal access to medical cannabis for all qualified patients regardless of their ability to pay;

- To reduce the barriers and improve access to medical cannabis and its potential benefits, including the potential to reduce health disparities in underserved and minority residents in Lansing; and

- To revitalize our neighborhood and contribute to Lansing’s wider economic development through job creation, increased tax base, and education and outreach.
Finally, 3208 MLK Inc. has sufficient capital in place to build, secure, and start up the proposed dispensary. We have sufficient capital to cover estimated costs of build, operation, compensation of employees with fringe benefits, equipment costs, utility costs, legal compliance, and other operating and maintenance costs as needed. As requested, we have provided proof of capitalization to cover such amounts.

2. Proposed Ownership Structure of the Establishment:

3208 MLK Inc. is one element in the FMJRL, Inc. family of companies. Frank Mastroianni has a 100% ownership in FMJRL, Inc. and shares a 50% interest in 3208 MLK Inc. with his business partner, Joseph Aiello.

Contemporaneous with this Application, FMJRL subsidiaries will be filing a Medical Marihuana Grower application, a Medical Marihuana Processor application, and another Medical Marihuana Provisioning Center application. You will find that 3208 MLK Inc. along with the other subsidiaries, are highly motivated and highly qualified medical marihuana businesses worthy of the opportunity to do business in the City of Lansing.

3. Current Organization Chart:

Frank Mastroianni – President, Director
Joseph Aiello - Vice President, Treasurer, Secretary, Director

4. Implementation Strategy

3208 MLK Inc. will use a community-driven, patient-centered care approach that will benefit all Lansing residents, including delivering care in a way that makes quality, affordable medical cannabis available to underserved minority, low-income and indigent populations. This complex commitment dictates the features of our implementation strategy:

- Patient-centered care,
- A professional clinical setting,
- Product variety,
- Scientific quality control,
- A skilled and knowledgeable staff,
- Investment in sustainable operations, community outreach, and enabling/support services.

A. Patient-Centered Care

The crucial element of our PCC approach will be meeting our patients where they are: communicating with them in the terms they are comfortable with. This requires that our
staff be well-trained, comfortable with diversity, and competent to interact appropriately with individuals from different backgrounds and levels of "medical literacy." As a "socio-culturally competent" caregiver, 3208 MLK Inc. will educate and empower its patients so that they share responsibility for their own healthcare decision-making and healthy lifestyle choices. Our PCC-focused dispensary will provide:

- A welcoming environment,
- Respect for patients' values and expressed needs,
- Patient empowerment,
- Staff socio-cultural competence,
- Help with coordination of care across providers,
- Emphasis on patient comfort and support, and
- Community outreach and collaboration.

Our staff, facility, and operations will prioritize education and patient empowerment. Maintaining a holistic focus and supportive services, it will seek to identify underlying factors that broadly influence quality of life, with emphasis falling on pain management, avoiding unhealthy behaviors, lifestyle change, improving physical conditioning, adopting better nutritional practices, reducing stress, and taking advantage of the profound mental health benefits that patients can derive from interpersonal support such as counseling, support groups, and community activities with those suffering from similar conditions.

As noted in our discussion above, research has shown PCC to result not only in far higher levels of patient satisfaction with their care, but also in better clinical outcomes and quality of life. While we are not practicing medicine, embracing PCC as the centerpiece of our model puts us ahead of the curve in this rapidly growing trend in healthcare.

B. Professional Clinical Setting

The compassionate cause of medical cannabis is ill served by reminders of the counterculture or association with the image or ethos of the "stoner." Our atmosphere will be designed to move medical cannabis away from any association with the counterculture or even with the casualness of uninformed home cultivation and focus attention on its scientific and medical legitimacy. In keeping with this, our dispensary collective will maintain the professional look and feel of a professional medical service clinic, and the fact that our products are scientifically cultivated and tested will be the key element in our strategy on which we plan to build public awareness of our "brand."

C. Strain Variety

Different strains of cannabis have different therapeutic and palliative effects, some offering relief from a given condition more than others. Furthermore, patients with serious medical conditions, such as those with wasting syndrome or undergoing chemotherapy for cancer, can have very specific tolerances, intolerances, and idiopathic
reactions to medication. To offer patients customized and scientifically precise treatment options, it is critical that we provide as wide a variety of strains of medical cannabis and as great a variety of delivery methods as possible. We will also provide a wide range of oils and edibles as soon as we begin our operations.

D. **Scientific Quality Control**

As discussed below, all our products will be tested for purity and potency by an independent testing laboratory and bear a guarantee of scientific quality control. We will work with our independent lab to provide the best possible product at a fair price.

E. **Skilled and Knowledgeable Member Staff**

Without a skilled and knowledgeable staff, our product diversity and Patient-Centered Care would be of little benefit to most patients. A crucial feature of our strategy is the extensive training that our staff will undergo to be able to advise patients on such things as the specific effects and side effects of various strains or delivery methods, their benefits for specific medical conditions, and their interactions with other medications, as well as with drugs and alcohol.

Providing patients with types of information they cannot obtain in traditional health care settings conforms with our general strategy of offering something that does not replace traditional health care, but complements it by providing something critically lacking in it. The need for complementary care is particularly evident in the case of medical cannabis because physicians typically recommend only that the patient use it, without specifying the strain or delivery form. This creates a patient information deficit and education need that our approach is designed to address. Because many dispensaries do not take this need seriously enough, our educational approach will quickly distinguish our “brand.”

F. **Investment in Community Outreach and Enabling Services**

Many states have dispensaries offering a variety of peripheral services on a patient-centered care model. 3208 MLK’s approach builds on successful dispensary models, improves the scope and type of community outreach, and delivers more targeted services that will benefit all Lansing residents.

5. **Proposed Marketing, Advertising and Business Promotion Plan:**

The success and growth of any business, especially a new business, starts with an effective marketing and advertising plan. Consistent with the promulgated Emergency Rules for the Medical Marihuana Facilities Licensing Act filed with the Secretary of State on December 4, 2017, the Applicant intends to fully comply with Emergency Rule 42.
Rule 42. Marketing and advertising restrictions.

(1) Marihuana facilities shall comply with all municipal ordinances, state law, and these rules regulating signs and advertising.

(2) A licensee shall not advertise marihuana product where the advertisement is visible to members of the public from any street, sidewalk, park, or other public place.

(3) Marihuana products must be marketed or advertised as "medical marihuana" for use only by registered qualifying patients or registered primary caregivers.

(4) Marihuana products must not be marketed or advertised to minors aged 17 years or younger. Sponsorships targeted to members aged 17 years or younger are prohibited.

It is expected that 3208 MLK Inc. will spend over $70,000 annually for the first year using the following marketing options:

A. The proposed marketing plan starts with a proper Website with detailed information. 3208 MLK Inc. will utilize Search Engine Optimization (SEO optimization). SEO will help position our website will help minimize exposure of marketing or promoting marihuana products to minors.

B. 3208 MLK Inc. will hold business events and conferences. This will improve community relations by providing educating the public.

C. 3208 MLK Inc. will utilize alternative online advertising options including Mantis, 420 Network, 420 Click and Women Grow. These sites are known in the cannabis culture, again minimizing marketing exposure to children.

D. 3208 MLK Inc. will advertise in thematic magazines including Dope, Cannabis Now, 420 Magazine, Marijuana Venture and MG Magazine. This also allows for specific marketing to an adult target audience within the cannabis culture.

6. Verification, Paperwork, and Tracking

A. Verification

Michigan allows patients and their designated caregivers to enroll in an identification program that provides them with a government-issued card identifying them as legally-qualified medical cannabis patients or caregivers. These medical marihuana identification cards allow for easy verification of the cardholder’s current eligibility status through a verification system that dispensaries and law enforcement can access. To be eligible for purchase of any medical marihuana product, we will verify the individual’s credentials with a state approved identification to verify their identity. Before anyone is allowed into our facility, they must present proper credentials.
B. Paperwork Compliance

All individual patients will be required to complete an application on their initial entry into our location. The patient will have to attest they have read the application, understood it, have answered all questions truthfully, and agree to abide by all rules and requirements of the provisioning center. The individual patient will be met by a qualified staff member who will speak with the individual patient and answer any questions the patient may have. The patient will then be given a Patient Handbook.

C. Tracking

We plan to track all patients, caregivers and sales. For every day, month, quarter, and year, we will track the total number of individuals who visit the dispensary, the number of their visits, and the number, quantity, and type of products sold and on hand for sale, as well as the number of plants or products under cultivation or production. This will allow us to ensure and document for the purposes of regulatory compliance the aggregate amount of medical marihuana in our facility does not exceed allowable limits.

All books, records, and accounts, including those related to membership, will be maintained to comply with applicable laws and regulations.

7. Tax Compliance and Accounting

3208 MLK will comply with local, state, and federal tax requirements. We are well aware of the unique federal tax implications for medical cannabis businesses, and have consulted with appropriate professionals to ensure full compliance with the Internal Revenue Service’s treatment of medical marijuana. We understand that for any drug that is considered illegal by the Federal government, including medical marijuana (albeit medically legal according to the State of Michigan), a 1982 tax code prohibits cost deductions for our business. 3208 MLK Inc. has hired a qualified Certified Public Accountant (Paul Samways) that is knowledgeable and capable of timely generating any forms or statements required.

8. Planned Tangible Capital Investment:

A. The total investment required for the first year of operation (exclusive of the cost of real property acquisition) is:

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property Acquisition Costs</td>
<td>$200,000.00</td>
</tr>
<tr>
<td>Expected Buildout Costs</td>
<td>$700,000.00</td>
</tr>
</tbody>
</table>
Security Equipment  $ 50,000.00  
Legal Expenses  $ 35,000.00  
Administrative Expenses  $ 24,000.00  
Sales and Marketing  $ 75,000.00

B. In addition to the application being submitted for this Medical Marihuana Provisioning Center, Frank Mastroianni intends to submit applications for two Medical Marihuana Grow Facilities in the City of Lansing. Each Grow Facility will add approximately 100 new jobs to the area that will have a positive economic benefit to the City.

9. **Expected Job Creation from the proposed Medical Marihuana establishment:**

The licensing of this establishment will create approximately 20 new jobs. It is expected the Applicant will be seeking qualified employees to fill the following jobs:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

Each new job created will pay between $15.00 - $50.00 per hour. In addition, Frank Mastroianni (through his entities) will be seeking licenses for a Medical Marihuana Grow operation, a Medical Marijuana Processor operation, and another Medical Marihuana Provisioning center that should add another 220 new jobs. In addition, the proposed buildout of the provisioning center will add approximately 50 construction jobs.

10. **Planned Worker Training Programs:**

3208 MLK Inc. intends to ensure all personnel are properly trained and educated to run a first-class Medical Marihuana Provisioning Center. To accomplish this goal, the staff must:

a. Understand the rules and regulations imposed by the City of Lansing and the State of Michigan relative to the Michigan Medical Marihuana Act.
This involves educating the staff and making sure they attend seminars to maintain the proper level of proficiency.

b. Understand the needs of the individual patients

c. Understand the floor plan of the dispensary and the various safety and security measures to handle any emergency situation that might develop.

d. Understand all point of sale procedures for any transfers or sales

e. Follow procedures in an employee handbook that will be given to all staff personnel. The handbook communicates business rules and performance standards, encourages employees to behave in a certain way, and helps ensure employees are treated consistently. The handbook also explains employee safety procedures, employee guidelines, security protocols, and educational training.

f. Understand the various products available with their benefits and drawbacks that would be available to patients.

g. Understand product information, dosage and daily limits.

h. Understand the educational materials available for the individual patient and caregivers.

i. Planned worker training includes background checks of employees and requirements that employees immediately report any new or pending criminal charges.

11. **Financial Structure and Financing of the Proposed Medical Marihuana Establishment:**

It is expected that the costs of improvement to the property will cost be approximately $700,000. 3208 MLK Inc., a subsidiary of FMJRL, Inc., is owned by Frank Mastroianni who has the financial resources to improve the proposed medical marihuana establishment without the need to incur new debt. No bank financing will be required.

12. **Building and Construction Plan**

The plans for conversion and upgrade of the existing facility keep several goals in mind:

- Complying with all code requirements,
- Meeting and exceeding safety and efficiency standards specific to the type of operations proposed, and
- Life safety, satisfying all regulatory compliance issues.
The new facility is designed to maximize the safety of our patients, employees, and neighbors, as well as the safety and security of our products. The design incorporates the most environmentally friendly materials and the latest technologies, enabling us to conserve energy and lessen our carbon footprint.

Areas of the lot not covered by the building will be upgraded and used for parking, circulation, and open space. Improvements to the surrounding lot will include repair of deteriorated portions of the pavement and the creation of ample parking spaces. The parking stalls will be marked with 4-inch wide white stripes.

Numerous public improvements will be undertaken landscaping, sidewalk, and lighting improvements.

See Security Plan (Item #14) for security measures being implemented

13. Competitive Advantage, Short-Term and Long-Term Goals and Objectives Consistent with this Chapter:

What sets 3208 MLK apart from other applicants is the economic growth that FMJRL, Inc. can bring to the City. In addition to this Provisioning Center License application, subsidiaries within FMJRL, Inc. will be seeking licensing for a Medical Marihuana Gower, a Medical Marihuana Processor and another Medical Marihuana Provisioning Center. The short-term goals of 3208 MLK Inc. are to commence building improvement once licensing is granted. Operations will commence after the appropriate inspections and certificates have been issued. We have been selected by a major university to educate their students about our industry.

As for our long-term goals, it is the expectation that 3208 MLK Inc. will continue to grow and develop with the community and become an industry standard for other provisioning centers to follow. As for the long-term goals of our parent company, there are developed real estate plans for additional medical marihuana facilities in the City of Lansing if the city allows for expansion. We intend to establish a non-profit enterprise that will work in conjunction with cancer foundations and medical facilities to eradicate cancer in our lifetime. We are here to be YOUR industry leader, someone you can be proud to acknowledge and sponsor.

14. Community Outreach / Education Plans and Strategies:

The mission statement of the South Lansing Community Development Association is to support citizen-driven development by a) providing programs and resources that address community-identified needs, b) empowering local residents and stakeholders to advocate for change, and c) facilitating collaborative efforts to achieve goals. We share the same core values. As part of our marketing strategy, we intend to hold business events and conferences. In conjunction with organizations such as the South Lansing Community
Development Association and the South Side Community Coalition, these goals can be met with the community benefitting from planned programs.

We can PROVE we are serious about education. 3208 MLK (along with the other companies in the FMJRL family) have been selected by Northern Michigan University, an accredited public university established by the Michigan Legislature in 1899, to provide programs to students directly related to the medical marijuana industry. Our curriculum includes classroom education to students in the fields of medical marijuana growing, cultivation, processing, and dispensary operations.

3208 MLK is committed to strong public engagement and outreach to OUR community. Our community outreach has three goals: (i) to establish a process by which the community can express itself regarding the project; (ii) to inform the community about medical cannabis issues; and (iii) to ensure that our approach genuinely reflects the community's needs. To reach our goals, we anticipate doing one or more of the following, depending on input at various stages of the project:

- Identifying a broad cross-section of community-based organizations and community leaders, including those representing indigent and traditionally underserved and underrepresented residents, to learn how residents and stakeholders can best receive useful information that enables them to participate meaningfully.

- Identifying and visiting civic, senior, and veteran organizations, health care support groups, and community meetings to introduce our nonprofit organization, our mission, and our vision for the patient care center. We believe this type of outreach establishes our legitimacy with the community and our vested interest in its welfare. We will listen receptively and respond to any concerns about the project.

- Holding or participating in a community meeting to introduce 3208 MLK Inc. and present the project to any parties with similar goals. Again, our purpose would be to listen and find ways to be responsive. Completing our outreach efforts with a follow-up letter to community stakeholders, letting them know that we heard their concerns and what procedures we will follow in responding to such concerns.

We are committed to engaging our patient and residential communities on an ongoing basis. We will partner with local community organizations to solicit volunteers for these positions.

We are proud of our military community and the services they provide. We are here to serve our active and veterans and give back to those who promised their lives for ours. We have the knowledge and compassion to address the needs of those who suffer with the unpleasant aftermaths of conflict and war.
A. Outreach Strategies

3208 MLK Inc. will create public awareness in several ways:

1. Public Education

   We can create public awareness of our dispensary through our community outreach and education programs. By offering free workshops and seminars on topics related to medical cannabis and the conditions for which it is typically recommended, as well as on legal issues surrounding medical cannabis, we make the existence of our organization known and attract members by positioning ourselves in the public mind as ambassadors of a socially responsible provider.

2. Developing Provider Alliances

   An important element of our patient-centered approach is the help we will offer patients in finding providers and services to handle other aspects of their care and in coordinating their care across their many different providers. To be able to do this, we must first build alliances with these other providers and organizations. However, alliances are two-way streets and will result in our getting referrals from them as well. A key part of this outreach initiative will be educating alliance partners on the benefits and legalities of medical cannabis, and on the processes involved in referring people for medical cannabis use. Hosting educational forums for other providers will therefore be a critical element in our business approach. Building strong alliances with other health care providers, community health clinics, hospices, community service organization, patient advocacy groups, support groups, AIDS organizations, senior homes, and referral networks will create a strong and lasting source of patient referrals. At the same time, it will give us greater resources to fulfill our own patient-centered mission, which includes helping patients find appropriate providers for services we do not offer and helping them coordinate their care across providers. Being known in the patient community as a wellness center with especially strong networking and referral resources will itself be a draw to patients with complex medical conditions.

3. Industry Leadership and Sponsorships

   We will keep our corporate “brand” visible though sponsorships of community and industry causes and through industry activism that reflects our community-focused public health agenda and its emphasis on compassion and social justice.

4. Public Relations

   Carefully managed messaging and coverage in local media can be a very effective means to create public awareness.
5. *Word of Mouth*

In the medical cannabis industry, satisfied members and their word of mouth is perhaps the most powerful generator of a growing membership. Many dispensaries report that “friend” is the most common answer reported on new patient intake forms when patients are asked to indicate how they heard about a dispensary. We do not intend to enlist patients to recruit new members or to offer any special incentives to do this. We will not need to. The high quality of supportive patient-centered care we offer as part of our basic mission will be incentive enough. We intend to operate as a “community center” for those suffering from serious medical conditions—what the literature on patient-centered care sometimes refers to as a “medical home-away-from-home” where patients can interact supportively with one another. Since non-members legally cannot be allowed in our facility, patients who appreciate this aspect of our services will naturally recommend membership to those of their friends who are also qualified medical cannabis patients.

Community and Economic Development

City government has shown great interest in revitalization and community development plans that correct systemic inequities and benefit blighted areas and disadvantaged populations. This brings us to a crucial component of our implementation strategy, which is an aggressive outreach and community benefits program. All transactions and money collected in excess of operating and recapitalization costs will be dedicated to funding this larger charitable mission, which has three components:

- Giving indigent and low-income patients full access to our products and wellness/support services,
- Removing other barriers to access through enabling services (providing transportation, interpreters, and referral to other access-enabling services), and
- A Community Benefits Plan.

1. *Commitment to Local Hiring and Spending*

We are committed to making our project a source of economic stimulus for Lansing. From initial build-out of the facility to the implementation of our community development initiatives, we intend to contract, buy, and hire locally, taking advantage of local recruitment resources to offer employment to displaced local workers who are willing to be retrained.

We estimate net direct spending for initial build-out and set-up will exceed $700,000.00 with the majority of these expenditures being spent on goods and services provided by local companies.

We believe that Phase I day-to-day operations will add approximately 20 qualified full-time employment opportunities to City’s economy. The dispensary will
contribute directly to the revitalization of its immediate neighborhood by funneling an influx of visitors from in and around the vicinity of the dispensary, bringing incidental business to shops, restaurants, and other services in the area.

2. *Community Benefits Plan*

We believe that we can and should have a critical role in the delivery of medical marijuana healthcare. We also believe that we have an important fiduciary obligation to be a “good neighbor” and provide benefits to our community as part of our healthcare mission. Therefore, we view our Community Benefits Plan as a blueprint for how we plan to accomplish our Mission.

In developing our Community Benefits Plan, we will ensure regular involvement of the community, including that of the representatives of the targeted underserved populations, in the planning and implementation of the Community Benefits Plan.

3. *Good Neighbor*

3208 MLK Inc. seeks to be an asset and a beneficial resource for the surrounding community. As a good neighbor, we will seek neighborhood and other necessary input through every phase of our operation, beginning with the build out and construction phase. We will evaluate and abate any potential public safety/nuisance violations.

We also believe that being a good neighbor requires that we work to improve the neighborhood. Some of the public improvements we plan to address are:

- Access Improvements
- Drainage Improvements
- Landscape Improvements
- Sewer Improvements
- Sidewalk Improvements
- Traffic Engineering Improvements
- Lighting Improvements
- Code Compliance

Finally, we will take all efforts to mitigate noise, odor, and pollution/waste, and will address nuisances, including limiting foot and car traffic. (See Item 27 for additional measures being implemented on land use and the effects on traffic patterns).

B. *Neighborhood Engagement and Communication-Community Support*

1. Community Engagement and Communication Plan:
a. The Applicant will provide information to each recognized neighborhood entity within a ½ mile radius from the Facility location. To ensure that access to the Community Engagement Coordinator ("CEC") is reliable and well defined, the Applicant will distribute the contact information to the designated officer/neighbor within each organization. Information for the CEC shall include cell phone number, email, Facebook, and Twitter accounts.

b. The CEC will produce a monthly newsletter announcing community events, re-messaging of important city announcements, industry news, and company sponsored functions. Distribution of the newsletter will be by electronic transmission to all interested residents and neighborhood organizations that are subscribers. Subscription will be at no cost. A request to have a recipient removed from the list will be honored in a timely manner. The newsletter will also be available on the company’s website.

c. The CEC shall be responsible for the community news content on the company’s website. The format of the website shall comply with standards to assist the visually impaired in accessing content.

d. The CEC will coordinate with the designated officials within City, County and State government to ensure that useful information is disseminated accordingly.

e. The CEC will not promote the business activity or product of the company, commercial messages shall be prohibited with respect to the work activities of the CEC, as defined.

f. Additionally, the CEC will be required to attend organized neighborhood meetings that occur within the outreach area. Meeting schedules are determined by the respective neighborhood bodies conducting the meeting. Attendance by the CEC shall be mandatory.

g. The employee, manager, or owner of the company designated as the CEC may engage in other work activities of the company, however, their responsibilities and duties as CEC shall be defined and limited only to community engagement and communications.

h. Company literature, in print and electronic format, shall include the name and contact information of the CEC. The company website will prominently display this information on its home page.

i. A page on the company website, titled "Community Engagement and Communication Plan", will outline the method that the company applies to
communicate with the interested public; provide a detailed account of meetings attended; and, information shared at neighborhood engagements.

2. Statement of Support for Lansing Neighborhoods and Community Needs:

a. The Applicant, through its business activities, shall have a charitable purpose to support various community needs, to include, but not limited to, human services, homelessness shelter services, food distribution, recreation programming and infrastructure, cultural events, and educational initiatives within the K-12 environment with the cooperation of the Lansing School District.

b. Primary focus of the Applicant is to support needs within the target area of the company location, however, the company will expand its reach based on need and collaboration with its community partners.

c. Amongst our family of companies, we will appropriate a minimum of $100,000 on an annual basis to support neighborhood and community needs. This does not include the value of volunteer work conducted by team members of the company.

d. A volunteer ethos shall be a part of the corporate culture of the company. Team member participation in the plethora of events and activities that occur will be listed in both the “Support of Lansing Neighborhoods and Community Needs” and “Community Engagement and Communication Plan” sections of the website.

e. The company shall list the value of volunteer work on its website. Valuation of volunteer work shall conform to the “Economic Impact of Volunteers Calculator” located at www.pointsdflight.org.

3. Office of Government Relations:

a. The Applicant recognizes the importance of maintaining a robust channel of communication with government officials and agencies, at all levels, having jurisdiction over the Applicant’s medical marihuana business activities.

b. The company shall identify a team member to serve in the capacity of “Government Affairs Associate” (“GAA”). The GAA will inform the Office of the Mayor, City Clerk, Ingham County – Chairperson, and the designated person(s) at Licensing and Regulatory Affairs (LARA), of non-material and material changes occurring, or contemplated, at the company. All notifications shall comply with stipulated rules governing notice requirements.

c. The GAA will represent the company at meetings held by Lansing City Council, Ingham County and the State of Michigan, specifically LARA.
d. The GAA shall communicate all interactions with the various government entities with the company’s management, ownership, and legal team.

15. **Charitable Plans and Strategies:**

Community involvement is very important to 3208 MLK Inc. We have already financially contributed to the Lansing Parks & Recreation Department, the South Lansing Community Development Association and the South Side Community Coalition and will continue to do so in the future. In addition, we will be performing volunteer work with the various community outreach programs.

Amongst our family of companies, we will appropriate a minimum of **$100,000** on an annual basis to support neighborhood and community needs. This does not include the value of volunteer work conducted by team members of the company.

We are proud of our military community and the services they provide. We are here to serve our active and veterans and give back to those who promised their lives for ours.

One of our long-term goals within the FMJRL family of companies is to establish a non-profit enterprise that will ultimately lead to a cure for cancer in our lifetimes.

16. **Minimum Operation Standards**

(a) Our Provisioning Center will be located in a building, as defined under Lansing Ordinance Section 1300.9.

(b) We will not be open between the hours of 10 p.m. and 9 a.m.;

(c) Consumption of marihuana on the premises will be strictly prohibited;

(d) We will continuously monitor our entire premises with a surveillance systems that include security cameras and video recordings will be maintained in a secure, off-site location for at least 14 days;

(e) We will install a permanent barrier between public or common areas of our medical marihuana provisioning center and our restricted or non-public areas. We will not store, display or transfer medical marihuana in an area accessible to the general public;

(f) Our medical marihuana storage areas within our medical marihuana provisioning center will be separated from any customer/patient areas by a permanent barrier. We will not display Medical marihuana in a sales area only if permitted by the MMFLA;

(g) Any usable medical marihuana remaining on premises of our medical marihuana provisioning center while our medical marihuana provisioning center is not in operation will be secured in a safe permanently affixed to the premises;

16
(h) We will not operate our Medical Marihuana provisioning center in a manner creating noise, dust, vibration, glare, fumes, or odors detectable to normal senses beyond the boundaries of the property. Further we will not create any nuisance that hinders the public health, safety and welfare of the residents of the City of Lansing.

(i) Our license shall be prominently displayed on the premises of a medical marihuana provisioning center;

(j) We will dispose of medical marihuana in a manner that prevents its acquisition by any person who may not lawfully possess it and otherwise in conformance with state law;

(k) All medical marihuana will be delivered to a patient will be properly packaged and labeled. Our label will include:

   (1) A unique alphanumeric identifier for the person to whom it is being delivered;

   (2) A unique alphanumeric identifier for the cultivation source of the marihuana;

   (3) That the package contains marihuana;

   (4) The date of delivery, weight, type of marihuana and dollar amount or other consideration being exchanged in the transaction;

   (5) A certification that all marihuana in any form contained in the package was cultivated, manufactured, and packaged in the state of Michigan;

   (6) The warning that; "This product is manufactured without any regulatory oversight for health, safety or efficacy. There may be health risks associated with the ingestion or use of this product. Using this product may cause drowsiness. Do not drive or operate heavy machinery while using this product. Keep this product out of reach of children. This product may not be used in any way that does not comply with state law or by person who does not possess a valid medical marihuana patient registry card."

   (7) The name, address, email address, and telephone number of an authorized representative of the dispensary whom a patient can contact with any questions regarding the product.

(l) We will require all registered patients to present both their Michigan medical marihuana patient/caregiver id card and state identification prior to entering restricted/limited areas or non-public areas of the medical marihuana provisioning center, and if no restricted/limited area is required, then promptly upon entering the medical marihuana provisioning center.

(m) Our premises shall be open for inspection during the stated hours of operation and as such other times as anyone is present on the premises.

(n) We will not display any signs that are inconsistent with local laws or regulations or state
law.

(o) We will not advertise material that is misleading, deceptive, or false, or that is designed to appeal to minors.

(p) We will not place or maintain an advertisement of medical marihuana within the distance limitations set forth in Lansing Ordinance Section 1300.13(a)

(q) Certified laboratory testing results that display at a minimum the tetrahydrocannabinol (THC), cannabidiol (CBD), total cannabinoid testing results, and a pass/fail rating based on the certified laboratory’s state-required testing will be available to all medical marihuana provisioning center patients/customers upon request and prominently displayed.
Budget Breakdown- Proposed Master Plan for Medical Marijuana Park
Development & Provisioning Centers

<table>
<thead>
<tr>
<th>3208 South Martin Luther King Blvd. Provisioning Building (20 Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
</tr>
<tr>
<td>Construction Improvements</td>
</tr>
<tr>
<td><strong>Total Cost for 3208 Investment</strong></td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>1520 E. Cavanaugh Development</th>
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<tbody>
<tr>
<td>Processing &amp; Grow Building (phase 1) (50 New Jobs) <em>currently under construction</em></td>
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<tr>
<td>Purchase of 1520 Cavanaugh</td>
</tr>
<tr>
<td>Construction Improvements Grow &amp; Processing</td>
</tr>
<tr>
<td><strong>Total Cost of Current Investment</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>1,500 plant count</td>
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<td>Processing License</td>
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<table>
<thead>
<tr>
<th>Grow &amp; Processing Building 60,000 sq. ft. (90 New Jobs)</th>
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<tbody>
<tr>
<td>Exterior Construction Cost @ $70 per sq. ft.</td>
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<td>Interior Improvements Grow &amp; Processing</td>
</tr>
<tr>
<td><strong>Total Cost of Improvements</strong></td>
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<tr>
<td></td>
</tr>
<tr>
<td>Add 2 (1,500) plant count</td>
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<table>
<thead>
<tr>
<th>Processing Building 14,400 sq. ft. (20 New Jobs)</th>
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<tr>
<td>Exterior Construction Cost @ $150 per sq. ft.</td>
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<td>Interior Improvements - Equipment</td>
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<td><strong>Total Cost of Processing Building</strong></td>
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<tr>
<th>Testing Facility Building 11,800 sq. ft. (15 New Jobs)</th>
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<table>
<thead>
<tr>
<th>Research &amp; Development Building 18,000 sq. ft. (10 New Jobs)</th>
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<tbody>
<tr>
<td>Construction Cost @ $200 per sq. ft.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Secure Transportation Service Building 20,500 sq. ft. (15 New Jobs)</th>
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<tbody>
<tr>
<td>Construction Cost @ $150 per sq. ft.</td>
</tr>
<tr>
<td><strong>Total Current &amp; Planned Future Construction</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2117 South Cedar Street Provisioning Building (20 Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
</tr>
<tr>
<td>Construction Improvements</td>
</tr>
<tr>
<td><strong>Total Cost for 2117 Investment</strong></td>
</tr>
<tr>
<td><strong>Total Capital Investment</strong></td>
</tr>
</tbody>
</table>

(240 New Jobs to Lansing)
NORTHERN MICHIGAN UNIVERSITY
AFFILIATION AGREEMENT
INDIVIDUAL STUDENT-ARRANGED UNPAID WORK EXPERIENCE

This agreement is entered into this 23rd day of October, 2017 by and between the below agency or business, referred to as AGENCY and Northern Michigan University, Department of

referred to as NMU and shall continue thereafter until (date) unless terminated by either party upon 90 days written notice to the other party.

AGENCY (or Business)
Name: Central Site Management, Inc.
Address: 32411 Round Rd
Wixom, MI 48092

NMU offers curricula, which permit enrolled students to receive work experience as part of their professional preparation. NMU wishes to enter into an arrangement with the AGENCY where the student may receive this experience and the AGENCY has an interest in, and resources for, providing this experience.

Any and all notices given under this agreement shall be directed to:

AGENCY contact:
Christopher Hillel, Attorney
32411 Round Rd
Wixom, MI 48092
(586) 303-2241
chris@chris-hillel.com

NMU contact:

GENERAL TERMS AND CONDITIONS
1. Students should be considered students and not employees of either party and thus not covered by AGENCY or NMU for purposes of compensation, fringe benefits, workers' compensation, unemployment compensation, minimum wage laws, income tax withholding, social security or any other purpose, because of their participation in an internship/work experience.

2. For each student placed with Agency there will be a LEARNING AGREEMENT that describes the expected learning outcomes for that student, including the tasks that the student is expected to be given, what the student is expected to learn, dates and times of the position, criteria for assessment,
training provided, intended supervision, reports and the documentation needed for grading and any other related information.

3. Each student is placed with AGENCY to receive experience as a part of his or her academic curriculum; those duties performed by the student are not performed as an employee, but in fulfillment of the LEARNING AGREEMENT and are performed under supervision. At no time shall a student replace or substitute for any employee of AGENCY. This provision shall not be deemed to prohibit the employment of a student by either party under a separate employment agreement. NMU shall notify each student of the contents of this paragraph.

4. Each party agrees to comply with and be separately responsible for compliance with all applicable laws, including anti-discrimination and employment laws.

5. In the performance of their respective duties and obligations under this agreement, each party is an independent contractor, and neither is the agent, employee or servant of the other, and each is responsible only for its own conduct.

6. Each party agrees that statutory and common law theories and principles of indemnification, contribution and equitable restitution shall govern and apply to claims, costs, actions, causes of action losses or expenses including attorney fees, resulting from or caused by its actions, the actions of its employees and of students, pursuant to this Agreement.

7. Both parties agree to maintain Commercial General Liability Insurance and Professional Liability Insurance, which covers employees and students whenever the liability might exist. A Certificate of Insurance will be furnished to the other party, on request, indicating effective coverage and liability limits.

8. This agreement is intended solely for the mutual benefit of the parties, and there shall be no monetary consideration paid to either party by the other.

**RESPONSIBILITIES OF NMU:**

1. Provide students in good academic standing and with appropriate preparation in the degree of study for the intended field experience.

2. Assign a faculty member to serve as a contact that will coordinate student learning activities between NMU and AGENCY, make periodic contacts, as feasible and necessary, with AGENCY and students.

3. Plan and administer, in consultation with the representatives of the AGENCY, a LEARNING AGREEMENT for each student.

4. Maintain all education records and reports relating to the educational program of each student and to comply with all applicable statutes, rules and regulations respecting the maintenance of and release of information from such records. The AGENCY shall have no responsibility regarding such records and shall refer all requests regarding such information to the UNIVERSITY.

5. Instruct each student with regard to general regulations and procedures which the parties have agreed are necessary, including, by way of example: Confidentiality of Agency records and information; Authority of Agency staff over patient, client or customer services; Uniform standards; Health Requirements; Importance of carrying their own health insurance.

**RESPONSIBILITIES OF AGENCY:**

1. Plan and administer all aspects of services provided at its facilities.
2. Provide qualified supervision of the student(s) during the work experience. AGENCY supervisory employees may relieve a student from a particular assignment or require that a student leave an area or department pending a final determination of the student's future status by the parties. AGENCY must notify NMU of its decision to remove a student from any experience prior to the agreed upon time and provide a written report to the NMU noting the reasons entailed in the removal.

3. Provide pertinent policies and procedures to students prior to student beginning the work experience.

4. Cooperate with the NMU in the planning and conduct of the student's work experience to ensure that it will fulfill the accepted LEARNING AGREEMENT.

5. Provide relevant education/training opportunities to student in fulfillment of the LEARNING AGREEMENT.

6. Provide requested verification of student's academic reports for time on task.

7. Complete an end of work experience evaluation of the student’s performance.

8. Provide a safe working/learning environment including the necessary office space and other required facilities, equipment and supplies, and travel.

AGREED TO:

AGENCY

By: [Signature]

Northern Michigan University

By: [Signature]

Name & Title

[Signature]

Name & Title

Date: Oct 26 2017

Date:

Procedure

1. Use this form only to create an agreement with an Agency for unpaid work experiences that will be individually student-arranged. The Director does not formally negotiate the placement, but may act on behalf of the process. The Agency might regularly use student interns or it may happen very infrequently. One agreement covers all instances of actual work experiences and continues until explicitly terminated by either party.

2. Verify whether an Affiliation Agreement is on file with Academic Affairs for this Agency. There may be an Agreement with a higher level division within an organization, e.g. DNR rather than Parks and Recreation. Agreements are not needed when the work experience is within NMU.

3. If not:
   a. Complete Affiliation Agreement for unpaid work experiences
   b. Obtain required signatures.
   c. Distribute copies to all signees, departmental Director and Academic Affairs.

-55-
BART NOW PLLC
CHRISTOPHER AIELLO
IOLTA ACCOUNT
32411 MOUND RD
WARREN, MI 48092

FOR 2117 Cedar LLC, Donation

PAY TO THE ORDER OF South Side Community Coalition
$ 200.

Flagstar
Bank

CHRISTOPHER AIELLO

PAY TO THE ORDER OF Lansing Parks and Recreation Department
$ 200.

Flagstar
Bank

CHRISTOPHER AIELLO

PAY TO THE ORDER OF South Lansing Community Development Association
$ 200.

Flagstar
Bank

CHRISTOPHER AIELLO
South Side Community Coalition
2101 W Holmes
Lansing, Michigan 48910

RE: Charitable Donation by 3208 MLK Inc.

Dear South Side Community Coalition:

We are new to your neighborhood. The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 3208 South Martin Luther King Jr. Blvd., Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

Frank Mastroianni, Director
3208 MLK, Inc.

adg/FM
Encl.
Lansing Parks and Recreation Department  
200 North Foster Avenue  
Lansing, Michigan 48912

RE: Charitable Donation by 2117 Cedar Inc.

Dear Lansing Parks and Recreation Department

We are new to your neighborhood. The mission statement of 2117 Cedar Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 2117 South Cedar Street, Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

[Signature]

Frank Mastroianni, Director
2117 Cedar, Inc.

adg/FM
Encl.
South Lansing Community Development Association
800 West Barnes Avenue
Lansing, Michigan 48910

RE: Charitable Donation by 3208 MLK Inc.

Dear South Lansing Community Development Association:

We are new to your neighborhood. The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 3208 South Martin Luther King Jr. Blvd., Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

Frank Mastroianni, Director
3208 MLK, Inc.

adg/FM
Encl.
PATIENT WELCOME

Welcome to 3208 MLK, Incorporated. Our goal is to provide you with a holistic approach to your wellness. In this Patient Handbook, we have included information about your visit, our guidelines, the medical marijuana law, and how to use medical marijuana. Please feel free to ask any staff member for clarification on handbook.

A. Patient Guidelines to Stay Safe and Health
   
   • Be a courteous and respectful neighbor
   • You must be at least 18 years old with a valid registry identification card to enter
   • Your identification must be ready at the door when you check in
   • Do not use or consume marijuana in transportation or public place
   • No cell phone calls or cameras are allowed in the building
   • You may not sell or distribute your marijuana medication
   • Place your medicine out of sight in a safe place before leaving the facility
   • Respect staff, other patients/caregivers, and neighbors
   • Report suspicious behavior to us

   FAILURE TO COMPLY WITH THESE GUIDELINES WILL RESULT IN TERMINATION OF SERVICE

B. Patients’ Rights
   
   • You have the right to be treated with respect and professionalism.
   • You have the right to accurate and easily understood information about the laws and local regulations.
   • You have the right to have your medicine provided elsewhere if needed.
   • You have the right to accurately labeled and weighed quality medication and accurate information about the medication being provided.
   • You have the right to obtain your medication in a safe and friendly environment.
   • You have the right to safe and effective medicine handled in appropriate and sanitary conditions.
   • You have the right to considerate, respectful, and non-discriminatory care.
   • You have the right to know if your referring physician has a personal or professional relationship with us.
MEDICAL MARIJUANA LAW OVERVIEW

In November 2008, the Michigan Medical Marijuana Initiative was approved by 62.7% of voters, making Michigan the thirteenth state to legalize medical marijuana. On the ballot as Proposal 1, the Michigan Medical Marijuana Initiative decriminalized the cultivation and use of medical marijuana by seriously ill individuals who have obtained a doctor’s approval. It allows patients to grow up to 12 marijuana plants and possess up to 2.5 ounces of usable marijuana. Qualified caregivers can grow up to 12 marijuana plants for each patient, with a maximum of five patients per caregiver.

The Michigan Medical Marihuana Act is administered by the Michigan Medical Marihuana Program, which issues Michigan Medical Marihuana Program Registry Identification Cards. It is mandatory for medical marijuana patients and primary caregivers to maintain a valid state registry ID card to receive any protections afforded by the Michigan Medical Marihuana Act. A patient or caregiver who possesses a valid state registry ID card is presumed to be in possession of marijuana for medical purposes if the amount does not exceed the limits allowed by state law.

A. What the Law Does

Protects Patients and Caregivers

The Act says that anyone who follows the requirements can’t be penalized for the medical use of marijuana. The Act prohibits certain discriminatory practices, including:

- A school or landlord can’t refuse to enroll or lease to a qualifying patient unless failing to do so would cause the school or landlord to lose benefits under federal law;
- An employer can’t discriminate against a qualifying patient in hiring, terminating, or imposing employment conditions unless failing to do so would cause the employer to lose benefits under federal law; and
- An employer can’t penalize a qualifying patient for a positive drug test for marijuana, unless the patient used, possessed, or was impaired by marijuana on the employment premises or during hours of employment.

Protects Physicians

The Act states that, if a physician complies with the procedures specified in the Act, she or he shall not be subject to arrest, prosecution or penalty in any manner or denied any right or privilege, including but not limited to civil penalty or disciplinary action by the Arizona board of medical examiners or by any other business, occupational or professional licensing board or bureau, based solely on providing written certifications or for otherwise stating that, in the physician’s professional opinion, a patient is likely to receive therapeutic or palliative benefit from the medical use of marijuana to treat or alleviate the patient’s debilitating medical condition or symptoms associated with the debilitating medical condition, but nothing in this chapter prevents a professional
licensing board from sanctioning a physician for failing to properly evaluate a patient's medical condition or otherwise violating the standard of care for evaluating medical conditions.

Limits Qualifying Medical Conditions

In order to use marijuana as medicine, a qualifying patient must be diagnosed with one or more of the following "debilitating" medical conditions:

- Cancer
- Glaucoma
- Human Immunodeficiency Virus (HIV)
- Acquired Immune Deficiency Syndrome (AIDS)
- Hepatitis C
- Amyotrophic Lateral Sclerosis (ALS)
- Crohn's disease
- Agitation of Alzheimer's disease
- A chronic or debilitating disease or medical condition or the treatment for a chronic or debilitating disease or medical condition that causes:
  - i. Cachexia or wasting syndrome;
  - ii. Severe and chronic pain;
  - iii. Severe nausea;
  - iv. Seizures, including those characteristic of epilepsy; and
  - v. Severe or persistent muscle spasms, including those characteristic of multiple sclerosis

B. What Medical Marijuana Law Does NOT Do

- Authorize smoking marijuana on public transportation or in a public place.
- Authorize a person to smoke medical marijuana in a parked car while outside a private business that is open to the public.
- Authorize a person to smoke medical marijuana on the front porch of your home.
- Authorize smoking medical marijuana in a public campground – even when no one is around.
- Authorize operating, navigating, or being in actual physical control of a motor vehicle, aircraft, or motorboat while under the influence of marijuana. A registered qualifying patient will not be considered to be under the influence of marijuana solely because of the presence of marijuana in the person’s system that appears in a concentration insufficient to cause impairment.
GUIDE TO USING MARIJUANA

The federal government classifies cannabis as a schedule 1 drug; a classification that implies that cannabis has no legitimate medical use. This classification should be changed because cannabis is recommended by a multitude of physicians for the treatment of many medical conditions. Furthermore, THC (the primary active compound in cannabis) is FDA approved and is called dronabinol. Dronabinol is marketed using the trade name Marinol.

There are many methods of using cannabis for the treatment of medical conditions. The following information is intended to inform medical cannabis patients about the various options available to them.

Please note: We are aware the Department may not allow all of these methods of ingestion, the following is for educational purposes only.

A. Smoking
Smoking marijuana produces the most immediate effects and permits the most refined control of your dosage. Smoking any material is not good for the lungs, but the amount of marijuana you need to smoke is so small that you need not be overly concerned. It is better to smoke the flowers rather than the leaves as this also reduces the amount you will need to smoke.

1. Popularity of Smoking
   - Rapid onset: Smoking delivers active compounds quickly into the bloodstream and to receptor sites via the lungs.
   - Simplicity: Compared to other dosage methods, smoking cannabis is simple, requiring very little preparation time. Before smoking cannabis, the patient must simply separate the buds into individual flowers and remove any stems. Doing so ensures an even burn and less need for flame application (less unwanted fumes=better-tasting, more healthful smoke). To make this easy, use a hand-held herb grinder or a pair of scissors and a shot glass.
   - Easy dosage determination: smoked cannabis is effective almost immediately, allowing the user to titrate the dose one puff at a time. This allows the user to get just the right dose by gradually increasing the dose until effective.

2. Methods of smoking
   a. Joint:
      (a.k.a. “marijuana cigarette” or “reefer”) Convenience of joints is key, as joints burn for multiple puffs worth of cannabis after only being lit once and are easily transportable. Joints also taste pleasant to most patients, and they don’t require breakable, expensive, or conspicuous equipment. A huge plus is efficient delivery of cannabinoids. This is perhaps due to a joint’s lack of a filter or long piping before the mouth, to which sticky cannabinoids adhere easily, reducing the amount of medicine
that actually reaches the patient’s body. It is a skill to roll a good joint, however, novices uninterested in learning how to do so should buy a joint-rolling machine or pre-rolled joints. Before rolling a joint, the patient should break the bud(s) into small, uniform pieces about the size of the individual bud flowers or slightly smaller. Stems should be removed from the flowers to avoid foul, acrid smoke and possible holes poked in the rolling paper. To roll a joint, practice, practice, practice or ask an expert at our facility for help. Some joint smokers prefer unbleached rolling papers, hemp rolling papers, or clear, cellulose-based papers, which may taste better and contain fewer impurities than traditional, bleached-white rolling papers. **Patients should note that, while still remarkably safe, joints are one of the less-healthy methods of dosage because they burn paper and glue along with cannabis, exposing users to impurities not presented by some other alternative dosage methods. Another downside is waste: Some smoke is inevitably lost between inhalations, and there is usually leftover cannabis in the “roach”, or the small, undesirable leftover part of a burned joint. However, joints’ efficient delivery of cannabinoids—relative to other smoking methods—may compensate for such waste.

b. Dry “Hand” Pipes

Hand Pipes: These come in a (possibly overwhelming) variety of shapes, sizes, and materials, but the basic mechanics are universal. To smoke a cannabis pipe: pack prepared buds into the bowl; and hold a flame directly over the medicine while simultaneously inhaling through the mouthpiece.

c. Water Pipes

Mechanically, these are nearly identical to hand pipes, but use a chamber of water to filter and cool the smoke before it is inhaled. There are two main types: bongs and bubblers, classified by either a large or a small filling chamber, respectively, in which the smoke collects. The main proven advantage over dry pipes or joints is comfort; smoke is cooled and free of hot ashes and particles. *BEWARE: large “hits” of smoke will cause light-headedness and an inclination to blacking out, and water pipes make accidentally taking a bigger-than-expected hit a possibility. Water pipes are supposed by many smokers to be a safer alternative to dry pipes or joints because the water filters tar out of the smoke. Unfortunately, as one test points out, water filtration removes THC and other desirable active compounds more so than tar. This means “in order to obtain the same effective dose of THC, a smoker would end up taking in at least 30% more tars from a water pipe than from an unfiltered joint”. However, water filtration may remove water-soluble toxic gases such as carbon monoxide, which is linked to heart disease, and aldehydes, which promote cancer [3], so more research is required to determine whether water pipes are beneficial or counterproductive.

**A problem with all pipe smoking is that you must suck on one side of the pipe, pulling air and, along with the flame—lighter fluid fumes—over the cannabis, through the pipe, and into your lungs to light the cannabis on fire. Grind your bud to minimize the need for a starting flame. To avoid lighter fluid fumes, some patients
light their pipe with an organic, beeswax-covered hemp wick, or a magnifying glass under bright sunlight.

First time smoking? Use discretion. Cannabis is highly potent. Don’t be alarmed though; this is good news for the patient because it allows him or her to burn less plant material to get an effective dose than with lower-potency cannabis [3,2]. This also means that, if the patient is new to smoking, it may only take one substantial inhalation to get an effective dose. Start with a small hit. Inhale deeply, exhale immediately (it is a myth that holding in the smoke will be more effective), and WAIT for several minutes to feel the effects of the hit before taking the next so as to minimize the dose.

In summary, if a patient wants the quickest relief possible (easy preparation, plus onset in seconds, and understands and accepts the possible risks inherent to smoking his or her medicine, a pipe is the utensil of choice.

Our growing process and drying process are designed to prevent problems associated with fungi that would affect the safety of our medicine. Buds will be inspected upon trimming and after drying for the presence of mold, and samples are sent to a laboratory for testing.

B. Vaporizing

Cannabis vaporizers are designed to let users inhale active cannabinoids while avoiding harmful smoke toxins. They do so by heating cannabis to a temperature that is just below the point of combustion where smoke is produced. At this point, THC and other medically active cannabinoids are emitted with little or none of the carcinogenic tars and noxious gases found in smoke. Many medical marijuana patients who find smoked marijuana highly irritating report effective relief inhaling through vaporizers. Also, vaporizers are very efficient so they can save money in the long term.

C. Eating

Marijuana can be eaten. When consumed this way, it is usually baked in brownies or cookies, and sometimes made into a candy. It takes longer to feel the effects when eaten, and may take longer for you to learn to control your dosage. However, when you do feel the effects, they may be stronger than those felt by smoking. You may also feel certain heaviness in your body. This will not hurt you. Schedule your time so that you can relax when you take it.

D. Tea

Like other herbs, marijuana may be made into a tea. Boil the water first and pour it over the marijuana. Let it steep for longer than you would for common black tea; approximately an hour and a half. Add 1 teaspoon of butter. The effects are similar to eating it.
E. Tincture

To prepare a tincture, use 5 parts fresh marijuana to 1 part vodka. If you are using dried marijuana, as is usually the case, use 10 parts marijuana to 1 part vodka. An easy way to do this if you don’t have measuring equipment, is to fill whatever container you are using (glass is preferable as you don’t want to leech any residues from metal containers) to thirds full with marijuana, then fill the container with vodka and let stand for a week or more. Afterward, strain the solution. If you use a larger portion of marijuana, the resulting tincture will be more potent.

F. Compress

Follow the recipe as for tea. Make as much as you need to thoroughly soak the cloth you intend to use. Apply to pain and leave on ½ hour.

G. Marinol

Marinol is a synthetic petrochemical analog of THC, one of the active elements found in marijuana. Some patients find that it helps relieve nausea yet takes a long time to work. Do not smoke this product. It has the potential for overdose. Use only under the supervision of a doctor.

**DOSAGE, POTENCY AND TOLERANCE**

A. Dosage

Smoking cannabis effects can be felt almost instantly. Tinctures are slightly slower to take effect than inhalation methods; they start to take effect in five minutes or less. Eating cannabis infused foods or capsules is the slowest method of medicating with cannabis but it provides longer lasting effects than other methods. The effects of ingested cannabis may take from 30 minutes to longer than an hour to be noticeable, and may maintain peak intensity for one to two hours before gradually diminishing over several hours. The effects imparted by eating cannabis are also pharmacologically different from those produced by other intake methods, because THC is converted to 11-hydroxy-THC in the liver when cannabis is eaten.

When using any cannabis preparation start with a small quantity, wait the proper amount of time for the effects to take place, and then take more if necessary. Dosage determination is most easily accomplished using inhalation and tincture methods. It is more difficult to determine ingestion dosage than inhalation or tincture dosage, because the onset of effects is much less rapid with ingestion. The amount of food and type of food in the digestive tract also play roles in determining effective ingestion dosage, further complicating the task. Whatever the method of intake, a lethal overdose of cannabis cannot be achieved. Overdosing on cannabis may produce unpleasant feelings such as drowsiness or anxiety, but users experiencing such feelings should stay calm and wait for the effects of cannabis to diminish. Users who fear the possibility of unpleasant feelings from an overdose may wish to avoid cannabis edibles, as eating cannabis is the most likely intake method to cause an overdose.
B. Potency

All of the varieties that we will offer are high, medium and low potent*. This is our policy for several reasons. One reason is high potency will save caretakers money by allowing them to use less medicine. Another reason is highly potent varieties are healthier for those who choose to smoke their medicine, because less plant material must be smoked to get the same dose of active compounds. We will also only offer highly potent varieties, as this will aid in simplifying the caretaker's task of choosing the right varieties for their individual needs. One last reason for this policy is that it will help caretakers determine the appropriate dosage of each variety.

*Each variety we offer is of different potency and has unique medicinal effects.

C. Tolerance

Proper dosage is difficult to gauge; many variables at play Cooking THC makes it slightly more psychoactive can be administered using tinctures, ingestion, smoking, vaporizing, and by other the effect of each method and the rate of onset when using each method varies, and vaporization provide the fastest onset of effects of any method of administering

Heavy cannabis use will, over time, result in lowered sensitivity to the drug. However, most patients lose side effects over time, not medicinal efficacy. To avoid gaining tolerance to cannabis, patients should try different varieties of cannabis and different intake methods.

**SIDE EFFECTS OF USING MARIJUANA**

Marijuana is one of the safest medicines: it is impossible to consume enough to produce a toxic effect in the body. However, if you are unfamiliar with it, there are some effects, which you should be aware of so that you can use it more effectively.

A. Uneasiness

Marijuana usually has a soothing and comforting effect on the mind. Sometimes, however, people do experience feelings of anxiety. If this happens to you, there are several things you can do. Try to stay in environments where you feel naturally comfortable. If you feel anxious, sit or lay down, breathe deeply, and relax. If you have loved ones with you, hold each other for a while. If you have a pet, hold or stroke it. Eating will often quickly reduce the feeling of anxiety. Then, the next time you use it, try reducing your dosage. Because of our social training, you may have feelings of guilt. Know that you have a right to your medicine.

B. Hunger & Thirst

Many patients use marijuana to stimulate appetite. If you are not using marijuana for this purpose, drink water or juice. If you wish to eat, eat good nourishing food rather than sweets.
C. Redness in the Eyes

This will not hurt you. If you must go out in public and are concerned about others' reaction to the redness, wear sunglasses or use eye drops.

D. Drowsiness

If marijuana makes you sleepy, take a nap if you can and wish to. As with all medicines that can produce drowsiness, don't drive or operate heavy machinery.

E. Sleeplessness

If you find that you can't sleep for a while after using marijuana, try reducing your dosage and avoid using it for about two hours or so before you want to sleep.

F. Short-term Memory Loss

Sometimes people find it difficult to carry on a complicated conversation, keep track of details, or perform complex tasks. If this happens to you, schedule your time so that you don't have to do these things when using your medicine.

G. Giddiness

Many people find that things, which normally don't seem funny become quite amusing when they use marijuana. Most people enjoy this effect. If you must deal with situations where humor would be inappropriate in your judgment, schedule your time so that you don't have to deal with them when you are taking your medicine.¹

SATIVA VS. INDICA

The efficacy of cannabis is directly related to strain selection, therefore we recommend care be taken in selecting appropriate strains to meet your needs. We are beginning to identify particular varieties that are effective for sleep, pain, appetite, and energy; as well as for specific conditions.

Cannabis potency varies with strains. In terms of medicinal dosage, the idea is to smoke as little as possible in order to reduce respiratory irritations from excessive inhalation of burnt plant matter. Patients are highly encouraged to use vaporizers, or ingest cannabis medicine to reduce any potential risks from smoking. Patients need less high potency cannabis to reach desired effects. Any patients who find they need increasingly larger doses to reach desired effects should reduce, or stop intake for a time, or change the variety of cannabis normally used. This helps patients return to a minimized effective dosage level.

Generally, the sativa plant is the taller and lankier variety, reaching heights of over 5-6

¹ Excerpt from Americans for Safe Access
meters. It is characterized by narrow serrated leaves and loose spear-like flower clusters that can be extremely resinous. Primarily, the effects of sativas are on the mind and emotions. In this regard, they tend to be more stimulating, uplifting, energizing, and creativity enhancing. These benefits can be particularly helpful for the psychological component of many illnesses. Sativas are generally better for daytime use.

Indica plants are normally shorter and stockier plants, reaching 1-2 meters in height with wide, deeply serrated leaves and compact and dense flower clusters. The effects of indicas are predominantly physical, although the relief of certain physical symptoms can have emotional results as well. These effects can be characterized as relaxing, sedating, and pain reducing. Indicas are generally best for later in the day and before bed.

Strain crosses, or hybrids, are the result of cross-pollination of various strains. The characteristics, and hence the effects, of one strain will usually be dominant. For example, indica-dominant crosses are good for pain relief, with the sativa component helping with energy, and activity levels. Sativa-dominant crosses are good for stimulating appetite, with the indica component helping to reduce body pain and increase relaxation.²

² Highlands Springs Wellness Center
<table>
<thead>
<tr>
<th>Sativa</th>
<th>Indica</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduces depression</td>
<td>Reduces pain</td>
</tr>
<tr>
<td>Relieves headaches and migraines</td>
<td>Relaxes muscle spasms</td>
</tr>
<tr>
<td>Energizes and stimulates</td>
<td>Stimulates appetite</td>
</tr>
<tr>
<td>Reduces awareness of pain</td>
<td>Reduces inflammation</td>
</tr>
<tr>
<td>Increases focus and creativity</td>
<td>Aids sleep</td>
</tr>
<tr>
<td>Reduces nausea</td>
<td>Relieves headaches and migraines</td>
</tr>
<tr>
<td>Stimulates appetite</td>
<td>Reduces intra-ocular pressure</td>
</tr>
<tr>
<td>Supports immune system</td>
<td>Anti-convulsant</td>
</tr>
</tbody>
</table>

**UNDERSTANDING EDIBLES**

Edibles are foods cooked with butter or oil that has been infused with marijuana (e.g. bars or cookies). Edible marijuana usually takes longer to take effect (20 minutes to an hour or more) and the effects generally last longer than smoking or vaporizing marijuana. All of our edibles are carefully enhanced with a consistent strength. Below we have provided safety tips for the consumption of our edible marijuana products.

- You should pay attention to the packing and labeling to make sure you are consuming the recommended strength, particularly since edibles are made in various strengths.
- If you are new to medical marijuana, you may want to start with a half dose, gradually increasing to recommended strength. You should "start low and go slow."
- When using edibles, it is important to no cross-medicate or use alcohol or other drugs. The effect may be strengthened, causing an overreaction, including unusual drowsiness or slow reflexes.
- If you ever over-medicate, medical marijuana is non-toxic and not lethal.
- All products should be stored in a safe place, away from children and pets.
- When eating or drinking medical marijuana, it can take up to 1 to 1.5 hours to feel the effects, depending upon your body's chemistry. You should wait at least an hour before taking more.
Emerging Clinical Applications
for Cannabis and Cannabinoids:
A Review of the Recent Scientific Literature
Fourth Edition

- Gliomas
- Alzheimer's
- Fibromyalgia
- Dystonia
- Hepatitis C
- Diabetes
- Pruritis
- Osteoporosis
- MRSA

- Multiple Sclerosis
- ALS
- Chronic Pain
- Tourette's Syndrome
- HIV
- Hypertension
- Sleep Apnea
- GI Disorders
- Incontinence
- Rheumatoid Arthritis

Image Courtesy of SDSScience.com
THE SAFETY PROFILE OF MEDICAL CANNABIS

Cannabinoids have a remarkable safety record, particularly when compared to other therapeutically active substances. Most significantly, the consumption of marijuana — regardless of quantity or potency — cannot induce a fatal overdose. According to a 1995 review prepared for the World Health Organization, “There are no recorded cases of overdose fatalities attributed to cannabis, and the estimated lethal dose for humans extrapolated from animal studies is so high that it cannot be achieved by … users.”

In 2008, investigators at McGill University Health Centre and McGill University in Montreal and the University of British Columbia in Vancouver reviewed 23 clinical investigations of medical cannabinoid drugs (typically oral THC or liquid cannabis extracts) and eight observational studies conducted between 1966 and 2007. Investigators “did not find a higher incidence rate of serious adverse events associated with medical cannabinoid use” compared to non-using controls over these four decades.

That said, cannabis should not necessarily be viewed as a ‘harmless’ substance. Its active constituents may produce a variety of physiological and euphoric effects. As a result, there may be some populations that are susceptible to increased risks from the use of cannabis, such as adolescents, pregnant or nursing mothers, and patients who have a family history of mental illness.

Patients with hepatitis C, decreased lung function (such as chronic obstructive pulmonary disease), or who have a history of heart disease or stroke may also be at a greater risk of experiencing adverse side effects from marijuana. As with any medication, patients should consult thoroughly with their physician before deciding whether the medical use of cannabis is safe and appropriate.

As states continue to approve legislation enabling the physician-supervised use of medical marijuana, more patients with varying disease types are exploring the use of therapeutic cannabis. Many of these patients and their physicians are now discussing this issue for the first time and are seeking guidance on whether the therapeutic use of cannabis may or may not be advisable. This report seeks to provide this guidance by summarizing the most recently published scientific research (2000-2010) on the therapeutic use of cannabis and cannabinoids for 19 clinical indications:

- Alzheimer’s disease
- Amyotrophic lateral sclerosis
- Chronic pain
- Diabetes mellitus
- Dystonia
- Fibromyalgia
- Gastrointestinal disorders
- Gliomas/other cancers
- Hepatitis C
- Human Immunodeficiency Virus
- Hypertension
- Incontinence
- Methicillin-resistant Staphylococcus aureus (MRSA)
- Multiple sclerosis
- Osteoporosis
- Pruritus
- Rheumatoid arthritis
- Sleep apnea
- Tourette's syndrome

In some of these cases, modern science is now affirming longtime anecdotal reports of medical cannabis users (e.g., the use of cannabis to alleviate GI disorders). In other cases, this research is highlighting entirely new potential clinical utilities for cannabinoids (e.g., the use of cannabinoids to modify the progression of diabetes.)

AILMENT SPECIFIC STRAINS

Below is information about the purported effectiveness of various strains of marijuana for certain health effects.⁴

<table>
<thead>
<tr>
<th>Strain</th>
<th>Effect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Afghanica</td>
<td>Nausea, pain</td>
</tr>
<tr>
<td>Afghanie x Haze</td>
<td>PMS</td>
</tr>
<tr>
<td>AK-47</td>
<td>Pain, nausea, depression, insomnia, headache</td>
</tr>
<tr>
<td>Alien Train Wreck</td>
<td>Asthma</td>
</tr>
<tr>
<td>Apollo 13</td>
<td>Back pain</td>
</tr>
<tr>
<td>Auntie Em</td>
<td>Crohn's Disease, MS</td>
</tr>
<tr>
<td>Aurora B</td>
<td>Nausea, joint pain, arthritis</td>
</tr>
<tr>
<td>Berry-Bolt</td>
<td>Insomnia, Joint pain</td>
</tr>
<tr>
<td>Big Bang</td>
<td>Used to sedate and relieve stress &amp; anxiety amongst sufferers of severe anxiety, etc.</td>
</tr>
<tr>
<td>Big Kahuna</td>
<td>Herniated disc pain, arthritis</td>
</tr>
<tr>
<td>Black on Blue Widow</td>
<td>HIV, back pain</td>
</tr>
<tr>
<td>Black Vietnamese</td>
<td>Nausea, muscle spasms, pain</td>
</tr>
<tr>
<td>Blue Fruit</td>
<td>Crohn's Disease, muscle spasms</td>
</tr>
<tr>
<td>Blue Moonshine</td>
<td>Anxiety, depression, insomnia</td>
</tr>
<tr>
<td>Blue Satellite x Jack Herer</td>
<td>Depression, nausea</td>
</tr>
<tr>
<td>Blue Satellite</td>
<td>Pain, nausea, insomnia, anxiety, muscle tension</td>
</tr>
<tr>
<td>Blueberry</td>
<td>Nausea, insomnia, pain</td>
</tr>
<tr>
<td>Bog Sour Bubble</td>
<td>Pain, anxiety</td>
</tr>
<tr>
<td>Bonzo Bud</td>
<td>Body pain, migraine</td>
</tr>
<tr>
<td>Budacolumbia</td>
<td>Nausea</td>
</tr>
<tr>
<td>Burmaberry</td>
<td>Migraine, depression</td>
</tr>
<tr>
<td>Burmese kush</td>
<td>Anxiety, depression</td>
</tr>
<tr>
<td>C99 x Great White Shark</td>
<td>Anxiety</td>
</tr>
<tr>
<td>Cali-O</td>
<td>Nausea</td>
</tr>
<tr>
<td>Catalyst</td>
<td>PMS</td>
</tr>
<tr>
<td>Cinderella 99</td>
<td>Nausea</td>
</tr>
<tr>
<td>CIT</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Citral</td>
<td>Insomnia</td>
</tr>
<tr>
<td>Cripple Creek</td>
<td>Ankylosing Spondilitis, Hepatitis C, Degenerative Disc Disease, IBS, Interstitial Cystitis, Chronic Rotator Cuff Disease</td>
</tr>
<tr>
<td>Deep Chunk</td>
<td>Joint pain, insomnia</td>
</tr>
<tr>
<td>Dynamite</td>
<td>Asthma, Crohn's Disease, Hepatitis C</td>
</tr>
<tr>
<td>NYC Sour Diesel</td>
<td>Edema, epilepsy, fibromyalgia, radiculopathy</td>
</tr>
<tr>
<td>El Nino</td>
<td>Nausea, insomnia</td>
</tr>
<tr>
<td>Fieldale Haze</td>
<td>Anxiety, back pain</td>
</tr>
<tr>
<td>Fig Widow</td>
<td>Back pain, psychosis</td>
</tr>
<tr>
<td>Firecracker</td>
<td>Anxiety, depression, nausea</td>
</tr>
</tbody>
</table>

⁴ Michigan Medical Marijuana Association
<table>
<thead>
<tr>
<th>Strain/Clone</th>
<th>Condition(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>G13 x HP</td>
<td>Nausea, joint pain, insomnia</td>
</tr>
<tr>
<td>G-13</td>
<td>Depression, pain, ADD, ADHD</td>
</tr>
<tr>
<td>Grapefruit</td>
<td>Arthritis, Hepatitis C, pain, nausea</td>
</tr>
<tr>
<td>Green Queen</td>
<td>Epilepsy, neck/spine pain</td>
</tr>
<tr>
<td>Green Spirit x Timewarp x Herijuana</td>
<td>RLS, insomnia, migraine, joint pain</td>
</tr>
<tr>
<td>Green Spirit</td>
<td>Nausea, headache, body pain</td>
</tr>
<tr>
<td>Herijuana x Trainwreck</td>
<td>Diabetic neuropathy, joint pain, insomnia, MS</td>
</tr>
<tr>
<td>Herijuana</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Ice Princess x Bubblegum</td>
<td>Migraine</td>
</tr>
<tr>
<td>Jack Herer</td>
<td>Anxiety, fibromyalgia</td>
</tr>
<tr>
<td>Juicy Fruit</td>
<td>Insomnia, joint pain, anxiety</td>
</tr>
<tr>
<td>Kali Mist</td>
<td>Nausea, depression</td>
</tr>
<tr>
<td>Kal-X</td>
<td>Body pain</td>
</tr>
<tr>
<td>Killer Queen</td>
<td>Depression, back pain</td>
</tr>
<tr>
<td>Krinkle x Kush x Freezeland</td>
<td>MS muscle spasms</td>
</tr>
<tr>
<td>Leda Uno</td>
<td>Insomnia</td>
</tr>
<tr>
<td>Legends Ultimate Indica x Herijuana</td>
<td>Muscle spasms, pain</td>
</tr>
<tr>
<td>Legends Ultimate Indica</td>
<td>Insomnia, IBS</td>
</tr>
<tr>
<td>Lemon Chemo</td>
<td>Insomnia, back pain, migraine</td>
</tr>
<tr>
<td>Lemon Haze</td>
<td>RLS, chronic fatigue</td>
</tr>
<tr>
<td>Lifesaver</td>
<td>Nausea, headache, pain, insomnia</td>
</tr>
<tr>
<td>Lollipop</td>
<td>Cachexia, degenerative bone/disc disease, edema, general pain, general seizures, glaucoma, migraine, MS, nausea, Post-Traumatic Stress Disorder</td>
</tr>
<tr>
<td>Lowryder</td>
<td>Nausea, pain, headache</td>
</tr>
<tr>
<td>LSD</td>
<td>Nausea, anxiety, depression, headache</td>
</tr>
<tr>
<td>M-39</td>
<td>Depression</td>
</tr>
<tr>
<td>Magic Crystal</td>
<td>Migraine, PMS, depression, SADS, mania, nausea</td>
</tr>
<tr>
<td>Mango x Northern Lights # 5</td>
<td>Pain, nausea, insomnia, anxiety</td>
</tr>
<tr>
<td>Mango</td>
<td>Back pain, nausea</td>
</tr>
<tr>
<td>Masterkush</td>
<td>Nausea</td>
</tr>
<tr>
<td>Medicine Woman</td>
<td>Diabetic neuropathy, general pain, general seizures, glaucoma, Hepatitis C, muscle spasms, nausea, radiculopathy</td>
</tr>
<tr>
<td>Misty</td>
<td>Hepatitis C, back pain, insomnia, nausea</td>
</tr>
<tr>
<td>Motarebel Oguana Kush</td>
<td>Nerve Pain, muscle spasms, back pain, headache, insomnia</td>
</tr>
<tr>
<td>Mountainberry</td>
<td>Insomnia, migraine, pain</td>
</tr>
<tr>
<td>Northern Lights # 1</td>
<td>Arthritis</td>
</tr>
<tr>
<td>Northern Lights # 2</td>
<td>Nausea, insomnia</td>
</tr>
<tr>
<td>Northern Lights x Jamaican</td>
<td>Arthritis</td>
</tr>
<tr>
<td>Northern Lights x Cinderella 99</td>
<td>Depression</td>
</tr>
<tr>
<td>Northern Lights x Shiva</td>
<td>Body pain, back pain, toothache</td>
</tr>
<tr>
<td>Northern Lights</td>
<td>Anxiety, radiculopathy, insomnia</td>
</tr>
<tr>
<td>Northernberry</td>
<td>Pain</td>
</tr>
<tr>
<td>Oregon 90</td>
<td>Insomnia, joint pain, RLS, pain, nausea</td>
</tr>
<tr>
<td>Original Mystic</td>
<td>Epilepsy</td>
</tr>
<tr>
<td>Strain</td>
<td>Condition</td>
</tr>
<tr>
<td>------------------------</td>
<td>----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>OG Kush Purple</td>
<td>Cachexia, degenerative bone/disc disease, Post-Traumatic Stress Disorder</td>
</tr>
<tr>
<td>Phaht Betty</td>
<td>Neck/spine pain</td>
</tr>
<tr>
<td>Queen Bee</td>
<td>Migraine</td>
</tr>
<tr>
<td>Sensi Star</td>
<td>Migraine, anxiety, insomnia, nausea</td>
</tr>
<tr>
<td>Shiskaberry x Dutch Treat</td>
<td>Anxiety, nausea</td>
</tr>
<tr>
<td>Shiskaberry x Hash Plant</td>
<td>Nausea</td>
</tr>
<tr>
<td>Skunk # 1</td>
<td>PMS</td>
</tr>
<tr>
<td>Sour cream</td>
<td>Insomnia, joint pain, nausea</td>
</tr>
<tr>
<td>Stardust 13</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Strawberry Cough</td>
<td>Back pain, depression</td>
</tr>
<tr>
<td>Super Impact x AK-47</td>
<td>Pain, insomnia</td>
</tr>
<tr>
<td>Super Impact</td>
<td>Nausea, insomnia. muscle pain, depression, anxiety, SADS, mania</td>
</tr>
<tr>
<td>Super Silver Haze</td>
<td>Nausea, depression</td>
</tr>
<tr>
<td>Super Thai</td>
<td>Depression</td>
</tr>
<tr>
<td>Sweet Blu</td>
<td>Degenerative bone/disc disease, diabetic neuropathy, edema, fibromyalgia, muscle spasms, nausea, neck/spine pain</td>
</tr>
<tr>
<td>Sweet Tooth # 3</td>
<td>Depression</td>
</tr>
<tr>
<td>Trainwreck x Herijuana</td>
<td>Nausea</td>
</tr>
<tr>
<td>Trainwreck</td>
<td>Anxiety, arthritis, diabetic neuropathy, depression</td>
</tr>
<tr>
<td>TX</td>
<td>Arthritis, nausea</td>
</tr>
<tr>
<td>Ultra Green</td>
<td>Arthritis, asthma, general pain, general seizures, glaucoma, MS</td>
</tr>
<tr>
<td>Wakeford</td>
<td>Insomnia</td>
</tr>
<tr>
<td>White Rhino - aka</td>
<td>Anxiety, nausea, insomnia</td>
</tr>
<tr>
<td>Medicine Man</td>
<td>Body pain, back pain, joint pain, insomnia</td>
</tr>
<tr>
<td>White Russian</td>
<td>Pain, nausea</td>
</tr>
<tr>
<td>White Widow x Big Bud</td>
<td>Depression</td>
</tr>
<tr>
<td>White Widow</td>
<td>Cachexia, Hepatitis C, Post-Traumatic Stress Disorder</td>
</tr>
</tbody>
</table>
SUBSTANCE ABUSE PREVENTION

We recognize the need to provide a safe environment that helps patients avoid substance abuse and misuse. Personal responsibility is critical to participating in our programs.

In 2009, approximately 28.5 million Americans age 12 and older had abused marijuana at least once in the year prior to being surveyed. Source: National Survey on Drug Use and Health (Substance Abuse and Mental Health Administration Web Site). By the time they graduate from high school, about 42 percent of teens will have tried marijuana, according to the NIDA.

According to the federal government, long-term marijuana use can lead to psychological addiction. It estimates that 9 percent of people who use marijuana will become dependent on it. The number goes up to about 1 in 6 in those who start using young (in their teens) and to 25-50 percent among daily users.

We offer workshops, clinics, and materials about the potential medical marijuana abuse will be integrated in all patient visits, materials, and outreach. Our staff also is trained to recognize possible signs of drug abuse.

REFERENCES AND RESOURCES

A. Marijuana Medical Research

  http://brain.oxfordjournals.org/cgi/content/full/129/5/1081
- A Collection of Articles That Address Research on Marijuana – National Institute on Drug Abuse (NIDA)
  http://www.drugabuse.gov/NIDA_Notes/NN0058.html
  http://www.nap.edu/catalog.php?record_id=6376
- Marijuana Research and Dissemination Update - March 2004 – NIDA

B. Marijuana Fact Sheets

- Cannabis myths: how harmful is cannabis? – UK DrugScope
  http://www.drugscope.org.uk/resources/mediaguide/cannabismyths.htm
- Marijuana: Facts for Teens – National Institute on Drug Abuse (NIDA)
  http://www.drugabuse.gov/Marijuana/Marijuans.html
- Marijuana: Facts Parents Need to Know – NIDA
C. Opposing Viewpoints

- (CON) Marijuana Myths & Facts: The Truth Behind 10 Popular Misperceptions – ONDCP
- (PRO) Myths and Facts About Marijuana – Drug Policy Alliance Network
  http://www.drugpolicy.org/marijuana/factsmyths/
- Medical Marijuana – ProCon.org
  http://medicalmarijuana.procon.org/

D. Information on the Web

- Michigan Department of Health: Medical Marijuana Program
- Americans for Safe Access
  www.safeaccessnow.org
- Science-based information about the effects of marijuana on your brain and body.
  http://www.marijuana-info.org/
- Medline Plus : Marijuana – National Library of Medicine (NLM) & National Institutes of
  Health (NIH). Authoritative information, including: news, NIH resources, overviews,
  diagnosis and symptoms, treatment, related issues, clinical trials, research,
  dictionaries/glossaries, directories, organizations and statistics.
- Marijuana : NIDA for Teens Web : The Science Behind Drug Abuse. Factual information for
  teens on the use and consequences of marijuana.
  http://teens.drugabuse.gov/facts/facts_mj1.asp
  for parents with information relating to teen use, talking to your teen, academic success,
  mental health, and more.
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>2117 CEDAR INC</th>
<th>2117 CEDAR INC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>---</td>
<td>2117 S CEDAR ST</td>
<td>2117 S CEDAR ST</td>
</tr>
</tbody>
</table>

### Scoring Insights

1. Marketing, Advertising and Promotion

   - Applicant provides several marketing, advertising and promotion examples and one minor prevention example (e.g., no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn’t get into much more detail. Lacks sufficient details and minor prevention examples. 2 good examples and 1 minor example of minimization in the marketing plan 11/30/18 R8.

   - **Score:** 4 / 3

2. Tangible Capital Investment in the City of Lansing

   - Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $20K, $1 million startup cost) and subsequent grow facility (20K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including >$2 million for R&D property at 1520 E. Cavanough).

   - **Score:** 15 / 15

3. Job Creation (Integrated System)

   - Overall number of jobs created

   - **Score:** 5 / 4

   - Applicant indicates 249 Lansing jobs will be created by their medical marijuana operations but does not provide much detail about them. Update 11/3/2018 since construction jobs are temporary, 120 jobs are counted with limited details about full-time or part-time, benefits and job descriptions. Poor details due to lack of number of full-time vs part-time, pay of salary positions, etc. 1 point deducted.

4. Financial Structure and Financing

   - Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and CPA attested liquid assets availability of > $1.65 million.

   - **Score:** 3 / 3

5. Plans to Integrate Facility with Other Establishments

   - Applicant indicates they intend to integrate their initial provisioning center with a 1,300 sq. ft. grow facility and other future operations.

   - **Score:** 2 / 2

6. Charitable Plans and Strategies

   - Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes, indicates they have been selected by Northern MI University to educate students (legal document provided), and included proof of checks totaling $600 already written to local organizations.

   - **Score:** 4 / 4

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.

   - **Score:** 5 / 4

   - Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Fall short of an optimal level of details.

8. Amount and Type of Compensation (PC)

   - Applicant states that the provisioning center employees will earn between $15 and $50/hour but does not provide an optimal amount of support details.

   - **Score:** 2 / 1
<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>9. Percent of Employees Earning At Least $15/Hour (FEC)</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Applicant indicates that all of the hourly positions will be paid no less than $15 to $50/hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Applicant provides a single line item number for annual budget and revenue (e.g., $1.02 million in expenses and $1.2 million in revenue) but no other details. Lacks sufficient details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Applicant provides litigation compliance verification forms for all stakeholders. Applicant proves they have over $100,000 in the bank and over $1 million in liquid assets.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Business Experience</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>&quot;Applicant indicates they have 2+ years as a medical cannabis caregiver, plus decades of business experience (e.g., business management, pharmacy, bookkeeping). Lacks the optimal amount of applicable business experience. Updated 11/3/2018 The stakeholders have 5+ years of cannabis business experience; below 10+ years optimal experience to receive full points. Staff provides additional caregiver experience, no change in points.&quot;</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>5</td>
<td>4</td>
</tr>
<tr>
<td>&quot;Not or exceeded requested items Update 11/2/18 Letter to cure for sanitation and fire plans from building safety - 1 pt deducted.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Very close to residential. Updated score using a better measurement tool 9/19/18 residential zoning found on the north, east and south side of property which falls short of the optimal distance of 1/4 mile (130 feet) to receive full points.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>&quot;Major traffic control renovations needed. Updated upon further review, score changed 8/23/18 based on recommendations to create a roundabout which would push traffic to the next neighborhood. Applicant recommends closing side entrance to avoid traffic into neighborhood. Positive review of traffic plan. Updated 8/23/18 Highest score in all categories, except driveway safety which is adequate score per traffic expert.&quot;</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>7</td>
</tr>
<tr>
<td>&quot;Minimum requirement for Security plan Tier 2. 2pts, traffic 5 pts. Strong traffic patterns, parking, and circulation. 11/30/2018 Update Security plan review by LPO notes a guard, off-site video storage, waiting room, and safe, but no equipment specs or barrier information. Consider Tier 1 and equal 2 points, no change in score, just further details.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Have a plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Improvements made or proposed to building</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>&quot;Exterior Cosmetic improvements, Plans do not reflect improvements just existing structure. Updated 10/24/18 using a more accurate measurement tool 5,700,000 for construction improvement which is 29% of the SEV of $176,300 which is above the optimal 15% SEV investment amount.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Plan to minimize/eliminate traffic</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Inadequate traffic plan. Land Use considered traffic plan after further review 8/23/18.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Plan to minimize/eliminate noise</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>&quot;Inadequate noise plan Update 12/5/2018 — plan to install of a brick wall or fence is listed in Land use and effect on surrounding neighborhood sections (tab 2F) However, it is inferred that it is a noise plan and would reduce noise 1 point added.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21. Plan to minimize/eliminate odor</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Inadequate odor plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22. LPD Complaints</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>1 assault report, 1 damage to property report, 1 fight call, 1 trouble with subject call, 2 stolen Auto calls, 3 medical/health calls, 1 other report. 8 calls (9+ ca le = 1 pt) 12/26/2018 No change to score. Applicant currently operating another business at this location.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>23. Demo of Regulatory Compliance</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>&quot;No tax history, 1 pt deduction for building safety.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Rating</td>
<td>Score</td>
</tr>
<tr>
<td>----------</td>
<td>--------</td>
<td>-------</td>
</tr>
<tr>
<td>24. Litigation History</td>
<td>2</td>
<td>0</td>
</tr>
</tbody>
</table>

"All stakeholders have a complete litigation history with no or minimal issue. Updated 11/28/19 after further review. "No record of acts detrimental to security, safety, morals." is deemed insufficient."
EXHIBIT 5
# Budget Breakdown - Proposed Master Plan for Medical Marijuana Park Development & Provisioning Centers

<table>
<thead>
<tr>
<th>3208 South Martin Luther King Blvd. Provisioning Building (20 Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
</tr>
<tr>
<td>Construction Improvements</td>
</tr>
<tr>
<td>Total Cost for 3208 Investment</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1520 E. Cavanaugh Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>Processing &amp; Grow Building (phase 1) (50 New Jobs) currently under construction</td>
</tr>
<tr>
<td>Purchase of 1520 Cavanaugh</td>
</tr>
<tr>
<td>Construction Improvements Grow &amp; Processing</td>
</tr>
<tr>
<td>Total Cost of Current Investment</td>
</tr>
<tr>
<td>• 1,500 plant count</td>
</tr>
<tr>
<td>• Processing License</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Grow &amp; Processing Building 60,000 sq. ft. (90 New Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exterior Construction Cost @ $70 per sq. ft.</td>
</tr>
<tr>
<td>Interior Improvements Grow &amp; Processing</td>
</tr>
<tr>
<td>Total Cost of Improvements</td>
</tr>
<tr>
<td>• Add 2 (1,500) plant count</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Processing Building 14,400 sq. ft. (20 New Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exterior Construction Cost @ $150 per sq. ft.</td>
</tr>
<tr>
<td>Interior Improvements- Equipment</td>
</tr>
<tr>
<td>Total Cost of Processing Building</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Testing Facility Building 11,800 sq. ft. (15 New Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Cost @ $200 per sq. ft.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Research &amp; Development Building 18,000 sq. ft. (10 New Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Cost @ $200 per sq. ft.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Secure Transportation Service Building 20,500 sq. ft. (15 New Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Cost @ $150 per sq. ft.</td>
</tr>
<tr>
<td>Total Current &amp; Planned Future Construction</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2117 South Cedar Street Provisioning Building (20 Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
</tr>
<tr>
<td>Construction Improvements</td>
</tr>
<tr>
<td>Total Cost for 2117 Investment</td>
</tr>
</tbody>
</table>

| Total Capital Investment                                      | $29,795,000|
| (240 New Jobs to Lansing)                                     |          |
EXHIBIT 6
# Medical Marijuana Provisioning Centers Scoring Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Business Plan &amp; Job Creation</strong></td>
<td></td>
</tr>
<tr>
<td>Ownership structure</td>
<td></td>
</tr>
<tr>
<td>Organizational chart</td>
<td>Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
</tr>
<tr>
<td>Worker Training Program</td>
<td></td>
</tr>
<tr>
<td>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>Minimization of exposure to minors</td>
</tr>
<tr>
<td>Tangible capital investment in the City of Lansing</td>
<td>Economic benefit to the City of the business plan, real property ownership, grower and/or processor facilities in the City</td>
</tr>
<tr>
<td>Job creation</td>
<td>Overall number of jobs created within the City of Lansing (highest), Lansing region, and Michigan (lowest)</td>
</tr>
<tr>
<td>Financial Structure and Financing</td>
<td>Net worth/capitalization sufficient for business plan as evidenced by notarized CPA attestation, financial institution statements, or the equivalent.</td>
</tr>
<tr>
<td>Plans to integrate grower facility with other establishments</td>
<td>2</td>
</tr>
<tr>
<td>Charitable plans and strategies</td>
<td>Commitment to fiscal and/or volunteer work</td>
</tr>
<tr>
<td>Job creation</td>
<td>Number of jobs at the provisioning center</td>
</tr>
<tr>
<td></td>
<td>Amount and type of compensation</td>
</tr>
<tr>
<td></td>
<td>Percent of employees earning over $15 per hour</td>
</tr>
<tr>
<td></td>
<td>Projected annual budget and revenue</td>
</tr>
<tr>
<td><strong>Total - Business Plan/Job Creation</strong></td>
<td>Incomplete plan will get zero points</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>Financial Stability &amp; Experience</strong></td>
<td></td>
</tr>
<tr>
<td>Sufficient Financial Resources</td>
<td></td>
</tr>
<tr>
<td>Financial forms including debt, bankruptcy, insolvency, tax compliance, tax returns and CPA attested, active bank/financial statements.</td>
<td>5</td>
</tr>
<tr>
<td>Business Experience</td>
<td></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>5</td>
</tr>
<tr>
<td>Total - Financial Stability &amp; Experience</td>
<td></td>
</tr>
<tr>
<td></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>
<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></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>Applicant/Stakeholder History</strong></td>
<td></td>
</tr>
<tr>
<td>Applicant/stakeholders record of acts detrimental to security, safety, morals, good order, general welfare</td>
<td>Lansing Police D complaints/incidents</td>
</tr>
<tr>
<td></td>
<td>Demonstration of regulatory compliance</td>
</tr>
<tr>
<td></td>
<td>Business litigation history</td>
</tr>
<tr>
<td><strong>Total - Applicant/Stakeholder History</strong></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.
RESUME REGARDING EXPERIENCE WITH
MEDICAL MARIHUANA OR A RELATED INDUSTRY

In support of an Application for a Medical Marihuana Licensure to operate a provisioning center at 2117 South Cedar Street, Lansing, Michigan 48910, the Applicant, 2117 Cedar Inc., a subsidiary of FMJRL, Inc and a Michigan Corporation submits the following statement identifying the qualifications and business experience of their staff:

Our staff (along with additional staff to be added) is knowledgeable and experienced as evidenced by the following:

SHAREHOLDERS AND STAKEHOLDERS

a. Frank Mastroianni

Frank Mastroianni has a degree in Business Management from Adrian College. For ten years, he was the manager of sales and marketing for Italy and American Construction. He has been a licensed realtor for the past fifteen years and is a multi-million dollar producer. For the past nine years, he has been a licensed residential builder.

Frank Mastroianni (either individually or as a sole corporate owner) owns five commercial properties and twelve residential properties in Southeast Michigan with a net worth in excess of four million dollars. He is also a co-owner of several additional commercial properties in Southeast Michigan. He is married (Rachel) with five sons.

Frank Mastroianni (Con Yank Inc.) has been approved by the City of Warren to operate a Medical Marihuana Grow Facility under the City of Warren local ordinance.

b. Joseph Aiello

Joseph Aiello has an extensive background experience in business management. For almost twenty years, Joseph Aiello was a design
engineer working with companies such as Ford Motor Company, General Motors, and Chrysler Corporation. For almost ten years, he managed government contracts as a civilian engineer with the United States Army (Sterling Heights, Michigan). For the past two years, he has been running an engineering firm in Florida, Manatee Engineering Services, LLC. This firm alone has a net worth in excess of twenty million dollars. He is married (Angela) with three children.

Joseph Aiello has the individual knowledge and ability to run a successful Medical Marihuana Provisioning Center. He routinely attends seminars and workshops to keep up to date with rules and regulations within the industry at both the state and municipal levels. He is actively involved in securing licensing for several other medical marihuana facilities in the State of Michigan.

Joseph Aiello has been instrumental and has an ownership in facilities that have been licensed by municipalities including:

**City of Warren, Michigan**
24224, Mound Road, Warren, Michigan
Growing medical marihuana
March 2017 – Present
Occupancy approved by Building Department, City of Warren, Michigan (1 City Square #305, Warren, Michigan 48093 Tel. (586) 574-4504)

**City of Ferndale, Michigan**
903 E. Lewiston, Ferndale, Michigan
Medical Marihuana Provisioning Center
Municipal license granted in 2014 by Ferndale City Counsel (City Hall Annex, 5694 Second Avenue, Ferndale, Michigan 48220. Email: SusanDuncan@cityofferndale.org)

**City of Detroit, Michigan**
14917 Gratiot, Detroit, Michigan
Medical Marihuana Provisioning Center
November 2017 – Present
Municipal license granted by: Board of Zoning Appeals, City of Detroit (Coleman A. Young Municipal Centre, 2 Woodward Avenue, Suite 212, Detroit, Michigan 48226 Tel. (313) 224-3595)
OPERATORS AND EMPLOYEES

c. Margaret (Margo) Carter

Margaret Carter studied medical billing at Baker College for two years. For six years until 2009, she managed the pharmacy and health/beauty departments at Arbor Drugs in Warren. She was the Manager at Brightside Dental in Warren where she was in charge of employees, patient relations, booking, billing, payroll, medical billing and inventory management. For five and one-half years, she managed an automotive collision shop (Steve’s Custom Color) again being in charge of insurance claims, ordering, scheduling, payroll and accounting. She has additional experience in accounting and bookkeeping when she worked for S&D Rental Properties, LLC for five years.

Margaret Carter has been a licensed medical marhuana patient and caregiver for more than two years. Her own experience with pain management makes her an exceptional asset with patient-caregiver interactions. She has extraordinary knowledge of the various medicines that can be used to treat patients. She constantly attends seminars and events to stay current with new products and new treatment plans. She can offer suggestions and dosage instructions to help the patient. In addition to her accounting and management skills, she is responsible, well-organized and has great social skills.

d. Sara Mokoski

Sara Mokoski (a Lansing resident) has a bachelor’s degree in Kinesiology from Michigan State University. For three and one-half years, she was employed at the MSU Bakery where she collaborated with the HR Department, did marketing of products online, and fulfilled product orders. She was a Behavioral Therapist for a year and one-half treating autistic children when employed by Responses located in Portage, Michigan. She was also a Personal Trainer for six months when she worked for Compel Fitness in Lansing.

As a licensed medical marhuana patient, Ms. Mokoski has first hand experience with medical marhuana products and their effects on the human body. Her graduate degree also provides invaluable experience as Kinesiology involves the scientific study of human body movement, addressing the physiological, biomechanical, and psychological mechanisms of movement.
LOCATION AND DISTANCE TO BUFFERED USES

3208 MLK Inc. is located a distance greater than all required for buffered uses.

a. The closest school is as follows: (1,000 feet per 1300.13(A)(1))

   Lansing Charter Academy – 4,127 feet

b. The closest library is as follows: (500 feet per 1300.13(A)(2))

   John W. Chi Memorial Medical Library – 4,787 feet

c. The closest public playground is as follows: (500 feet per 1300.13(A)(2))

   Washington Park – 3,934 feet

d. The closest commercial childcare organization (non-home occupation) is as follows: (500 feet per 1300.13(A)(2))

   Loretta’s Daycare – 1,834 feet

e. The closest church is as follows: (500 feet per 1300.13(A)(2))

   Lansing Church of the Brethren – 1,861 feet

f. The closest substance abuse prevention services or substance abuse treatment and rehabilitation services is as follows: (500 feet per 1300.13(A)(2))

   Mid-Michigan Recovery Services Inc. – 1,719 feet
**Google Map Developers**

not associated with google maps

**Distance From To:** Calculate distance between two addresses, cities, states, zipcodes, or locations

Enter a city, a zipcode, or an address in both the **Distance From** and the **Distance To** address inputs. Click Calculate Distance, and the tool will place a marker at each of the two addresses on the map along with a line between them. The distance between them will appear just above the map in both miles and kilometers. The tool is useful for estimating the mileage of a flight, drive, or walk. Can easily determine the distance between 2 cities as well.

**Distance From:** 3208 S Martin Luther King Jr. Blvd, Lansing, MI 48917  
**Distance To:** Lansing Charter Academy, Lansing, MI 48917  
**Calculate Distance**

- **Straight line distance:** 0.37 miles, 0.60 kilometers (km), 1965 feet, 599 meters
- **Driving distance:** 0.76 miles, 1.26 kilometers (km), 4127 feet, 1256 meters

---

**Google**

You can share or return to this by using the link below

https://www.mapdevelopers.com/distance_from_to.php?
&from=3208%20S%20Martin%20Luther%20King%20Jr%20Blvd%20Lansing%20MI

---

**Other tools to help with distance questions**

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the **mileage calculator** to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the **distance calculator**. We are always trying to find better ways to provide you with the information you need. If you have suggestions please let us know.
Distance From To: Calculate distance between two addresses, cities, states, zipcodes, or locations

Enter a city, a zipcode, or an address in both the Distance From and the Distance To address inputs. Click Calculate Distance, and the tool will place a marker at each of the two addresses on the map along with a line between them. The distance between them will appear just above the map in both miles and kilometers. The tool is useful for estimating the mileage of a flight, drive, or walk. Can easily determine the distance between 2 cities as well.

Distance From: 3208 S Martin Luther King Jr Blvd, Lant; Distance To: John W Chi Memorial Medical Library, Li

Calculate Distance

Straight line distance: 0.73 miles, 1.18 kilometers (km), 3856 feet, 1175 meters
Driving distance: 0.91 miles, 1.46 kilometers (km), 4787 feet, 1459 meters

Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cites. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
Google Map Developers
not associated with google maps

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Distance From: 3208 S Martin Luther King Jr. Blvd, Lansing, Michigan
Distance To: Washington Park, Lansing, Michigan

Calculate Distance

Straight line distance: 0.51 miles, 0.82 kilometers (km), 2680 feet, 817 meters
Driving distance: 0.75 miles, 1.20 kilometers (km), 3934 feet, 1199 meters

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3 Steps to Fast Maps & Directions:
1) Click "Get Maps"
2) Free Access - No Sign Up
3) Get Free Directions and Maps

All your stores in one:

Google Express

Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
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Distance From: 3200 S Martin Luther King Jr. Blvd, Land Distance To: 3200 S Washington, Lansing, Michigan

Straight line distance: 0.28 miles, 0.42 kilometers (km), 1393 feet, 425 meters
Driving distance: 0.35 miles, 0.56 kilometers (km), 1834 feet, 559 meters

Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
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Distance From: 3208 S Martin Luther King Jr. Blvd, Lansing
Distance To: Lansing Church of the Brethren, Lansing
Calculate Distance

Straight line distance: 0.35 miles, 0.57 kilometers (km), 1861 feet, 567 meters
Driving distance: 0.44 miles, 0.72 kilometers (km), 2349 feet, 716 meters

Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
Google Map Developers
not associated with google maps

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Enter a city, a zipcode, or an address in both the Distance From and the Distance To address inputs. Click Calculate Distance, and the tool will place a marker at each of the two addresses on the map along with a line between them. The distance between them will appear just above the map in both miles and kilometers. The tool is useful for estimating the mileage of a flight, drive, or walk. It can easily determine the distance between 2 cities as well.

Distance From: 3298 S Merlin Luther King Jr. Blvd, Lansing, Michigan
Distance To: 913 W Holmes, Lansing, Michigan
Calculate Distance

Straight line distance: 0.33 miles, 0.52 kilometers (km), 1719 feet, 524 meters
Driving distance: 0.33 miles, 0.51 kilometers (km), 2011 feet, 613 meters

Get Maps
3 Steps to Fast Maps & Directions:
1. Click "Get Maps"
2. Free Access - No Sign Up
3. Get Free Directions and Maps

You can share or return to this by using the link below:
https://www.mapdevelopers.com/distance_from_to.php?&from=3298%20S%20Merlin%20Luther%20King%20Jr.%20Blvd%20Lansing%20MI&

Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
EXHIBIT 9
The required separation distances from Medical Marijuana Provisioning Centers to the various buffered uses listed in Section 1300.13(1) & (2) is measured at a right angle from the nearest edge of the proposed provisioning center building to the centerline of the road, along the centerline of the road and connecting at a right angle to the nearest point of the buffered use building or public playground equipment located in a park.
EXHIBIT 10
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>GREEN SQUARE HOLDINGS LLC</th>
<th>GREEN SQUARE HOLDINGS LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>5031 S. CEDAR ST.</td>
<td>5031 S. CEDAR ST.</td>
</tr>
</tbody>
</table>

14. Buffering between residential zoned areas and establishment: 5

3

Landlord issue: Updated score using a better measurement tool. 9/18/18. 224 ft from residential zoning which falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.
EXHIBIT
Site Plan

Proposed Provisioning Center
Existing Building
3208 South Martin Luther King Blvd.
Lansing, Mi. 48910
LAND USE AND EFFECT ON SURROUNDING NEIGHBORHOOD

In support of an Application for a Medical Marihuana Licensure to operate a provisioning center at 3208 South Martin Luther King Jr. Blvd, Lansing, Michigan 48910, the Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation submits the following statement how their land use will have an effect on the surrounding neighborhood:

1. The proposed use of the establishment as a Medical Marihuana Provisioning Center is consistent with land use for the surrounding neighborhood and not have a detrimental effect on traffic patterns and resident safety.

2. Pedestrian access on South Martin Luther King Jr. Blvd will be clearly marked.

3. There will be no exit onto a residential street.

4. Speed will be clearly posted for travel in the parking lot.

5. There will be complete ADA access with appropriate ramps and handrails.

6. There will be proper lighting and increased visibility for pedestrians and invitees.

7. The parking lots will be smooth and maintained.

8. The proposed hours of operation will be between 9:00 am and 10:00 p.m.

9. The proposed site is zoned for commercial use and will be used in that manner.

10. The proposed site is located on a main thoroughfare – South Martin Luther King Jr. Blvd.

11. Ingress and egress from the proposed facility will be directed solely onto South Martin Luther King Jr. Blvd. and not towards any side street that would lead towards residential property.
12. There is ample parking at the proposed facility and there will be signage posted not to park on any residential side street.

13. To reduce traffic in/out of the facility, scheduled appointment times with patients will be arranged. The facility will be able to accept call-in orders to predict traffic patterns to minimize traffic and noise.

14. By reducing the traffic flow in and out of the proposed location, this will also minimize the amount of noise to the surrounding neighborhood.

15. Any use of medical marihuana on the premises is strictly prohibited. This will eliminate any odors to the surrounding neighborhood.

16. There will be additional buffering between the proposed location and any residential neighborhood by the installation of a block wall or fencing.
DETRIMENTAL ACTS TO SECURITY, SAFETY, MORALS, GOOD ORDER, AND GENERAL WELFARE

FRANK MASTROIANNI, states the following:

1. I am a Director of 3208 MLK Inc. and have the authority to issue this statement.

2. The Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation has submitted an Application for a Medical Marihuana Licensure to operate a provisioning center at 3208 Martin Luther King Jr. Blvd, Lansing, Michigan 48910.

3. The Applicant and the stakeholders of the Applicant have no record of acts detrimental to security, safety, morals, good order or general welfare.

4. The Applicant and the stakeholders of the Applicant have no record of any complaints or incidents with the Lansing Police Department.

5. The Applicant and the stakeholders of the Applicant have no record of any business litigation history.

6. The Applicant has committed no violations of the 2016 Ordinance #1202 Moratorium.

Frank Mastroianni, Director
3208 MLK Inc.
April 2, 2019

3208 MLK Inc.
32411 Mound Road
Warren, Michigan 48092

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 3208 Martin Luther King Jr Blvd. Your score after appeal is 80, which eliminates the possibility of ranking in the top 20, therefore I have determined your appeal is denied. One point was added for submitting a Litigation History on one of the two stakeholders in your application.

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.

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

Lansing City Clerk's Office
Ninth Floor, City Hall, 124 W. Michigan Ave., Lansing, MI 48933-1695
517-483-4131 - 127.77-0068 FAX
www.lansingmi.gov/ clerk  city.clerk@lansingmi.gov
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>3208 MLK INC</th>
<th>3208 S MARTIN LUTHER KING JR BLVD</th>
<th>3208 S MARTIN LUTHER KING JR BLVD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>---</td>
<td>3208 S MARTIN LUTHER KING JR BLVD</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>1. Marketing, Advertising and Promotion</td>
<td>4</td>
<td>2</td>
<td>Applicant provides several marketing, advertising and promotion examples and one minor prevention example (e.g., no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn't get into much more detail. Lacks sufficient details and minor prevention examples.</td>
<td></td>
</tr>
<tr>
<td>2. Tangible Capital Investment in the City of Lansing</td>
<td>15</td>
<td>12</td>
<td>*Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $300K, $1 million startup costs) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including $2 million for R&amp;D property at 1520 E. Cavanaugh). 9/4 UPDATE Changing the land contract from $300K to $200K does not impact the original score of 15 since the applicant indicates $27.8 million investment associated with integrated operations (including $2 million for R&amp;D property at 1520 E. Cavanaugh and does include a PC at 2117 S. Cedar Street.). Even taking into account the other PC, applicant still well above the $1 million TCI threshold. Suggestion: No change of the score is recommended. 3/5/2019 - Applicant does not provide any detail or supporting material other than land contracts. There is no budget for the proposed property improvements, just a dollar amount. Their budget is 2 lines - one for projected income, one for projected costs. No explanation of either.</td>
<td></td>
</tr>
<tr>
<td>3. Job Creation (Integrated System) Overall number of jobs created</td>
<td>5</td>
<td>4</td>
<td>Applicant indicates 220 Lansing jobs will be created by their medical marijuana operations but does not provide much detail about them.</td>
<td></td>
</tr>
<tr>
<td>4. Financial Structure and Financing</td>
<td>3</td>
<td>3</td>
<td>Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and liquid assets availability of &gt; $1.65 million.</td>
<td></td>
</tr>
<tr>
<td>5. Plans to Integrate Facility with Other Establishments</td>
<td>2</td>
<td>2</td>
<td>Applicant indicates they intend to integrate their initial provisioning center with a 1,500 plant, 27,000 sq. ft. grow facility and other future operations.</td>
<td></td>
</tr>
<tr>
<td>6. Charitable Plans and Strategies</td>
<td>4</td>
<td>3</td>
<td>Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes, indicates they have been selected by Northern M University to educate students (includes legal agreement form). Lacks proof of actual payment or an executed agreement.</td>
<td></td>
</tr>
<tr>
<td>7. Number of Jobs at the Provisioning Center Category Thresholds: 1 = &lt; 6 jobs, insufficient details; 2 = &lt; 6 jobs, sufficient details; 3 = 6 jobs, sufficient details; 4 = &gt; 6 jobs insufficient details; 5 = &gt; 6 jobs, sufficient/good details.</td>
<td>5</td>
<td>4</td>
<td>Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of clear details.</td>
<td></td>
</tr>
<tr>
<td>8. 'Amount and Type of Compensation (PC)</td>
<td>2</td>
<td>1</td>
<td>Applicant states that the provisioning center employees will earn between $15 and $50/hour, but does not provide an optimal amount of support details.</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------------------</td>
<td>---</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>Applicant indicates that all of the hourly positions will be paid no less than $15/hour.</td>
<td></td>
</tr>
<tr>
<td>10. Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>1</td>
<td>Applicant provides a single line item number for annual budget and revenue (e.g., $1.02 million in expenses and $1.2 million in revenue) but no other details. Additional information about Capital Dank (e.g., $3 million in annual revenue, etc.) is confusing since not made clear how it relates to the provisioning center. Lacks sufficient clear details.</td>
<td></td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
<td>5</td>
<td>5</td>
<td>Applicant provides litigation compliance verification forms for all stakeholders. Applicant proves they have well over $100,000 in the bank and over $1 million in liquid assets.</td>
<td></td>
</tr>
<tr>
<td>12. Business Experience</td>
<td>5</td>
<td>4</td>
<td>Applicant indicates they have 2+ years as a medical marijuana caregiver, plus decades of business experience (e.g., business management, pharmacy, bookkeeping). Lacks the optimal amount of applicable business experience.</td>
<td></td>
</tr>
<tr>
<td>13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
<td>5</td>
<td>4</td>
<td>Lack of detail in jobs, budget, TCI.</td>
<td></td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
<td>5</td>
<td>3</td>
<td>Inadequate barriers. Not close residential. Updated score using a better measurement tool 9/17/18 approx 535 ft from residential zoning which falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.</td>
<td></td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td>4</td>
<td>Shared drive updated 9/25/18 inadequate in driveways &amp; circulation (change in score)</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>6</td>
<td>Tier 2 2 pts Minimum requirement for Sec plan Tier 2, traffic 4 pts, strong traffic patterns and parking updated 9/25/18 inadequate in driveways &amp; circulation (change in score)</td>
<td></td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations,</td>
<td>1</td>
<td>1</td>
<td>Community plan to meet with neighbors</td>
<td></td>
</tr>
<tr>
<td>18. Improvements made or proposed to building</td>
<td>3</td>
<td>3</td>
<td>Final plans not yet submitted or approved for improvements. Updated 9/21/18 using a more accurate measurement tool, $700,000 in buildout costs which is 327% of SEV $214,100 which is above the optimal 125% SEV investment amount</td>
<td></td>
</tr>
<tr>
<td>19. Plan to minimize/eliminate traffic</td>
<td>2</td>
<td>2</td>
<td>Traffic plan included</td>
<td></td>
</tr>
<tr>
<td>20. Plan to minimize/eliminate noise</td>
<td>2</td>
<td>2</td>
<td>Detailed Plan to reduce traffic to reduce noise, block wall or fencing</td>
<td></td>
</tr>
<tr>
<td>21. Plan to minimize/eliminate odor</td>
<td>3</td>
<td>3</td>
<td>Detailed Bokashi compost plan</td>
<td></td>
</tr>
<tr>
<td>22. LPD Complaints</td>
<td>4</td>
<td>4</td>
<td>1 Assault report - 1 harassing phone call report - 1 other Report - 5 B&amp;E alarm - 1 MDOP call - 2 susp. Person call - 4 check welfare - 1 larceny call - 1 prostitution report - 4 unwanted - This may be logan square, 21 calls (9+calls drops score to 1 pt) 12/26/2018 Not currently operating at this location. Location in a strip mall.</td>
<td></td>
</tr>
<tr>
<td>23. Demo of Regulatory Compliance</td>
<td>4</td>
<td>4</td>
<td>Updated 9/25/18 No tax issues</td>
<td></td>
</tr>
<tr>
<td>24. Litigation History</td>
<td>2</td>
<td>1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------------</td>
<td>---</td>
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<td></td>
<td></td>
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<td></td>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
| "All stakeholders have a complete business litigation history with no or minimal issue. It does not include personal history 11/26/2018. Updated 11/28/18 after further review, "no record of acts of detrimental to security, safety, morals..." is determined insufficient. 4/2/2019 - Clark added one point to this category because a litigation history was submitted for one of the two stakeholders. JSZ."
| Total Score            | 100 | 80 |
CITY OF LANSING
HEARING OFFICER
DECISION RECOMMENDATION

In Re:

3208 MLK, Inc.
Proposed Location: 3208 S. Martin Luther King, Jr. Blvd.

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 3208 MLK, Inc. and its license application for a Medical Marihuana Provisioning Center that the license application remain denied.

FACTS

3208 MLK, INC. ("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 8, 2019, Appellant was informed that its license application was denied because of its score and rank, having received a score of 79 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 argues that in November 2018, Appellant was notified that its application had scored in the top 20 of the applications that were then received. Appellant now appeals the scoring of their application.

City Clerk Position

The City Clerk affirms its position on the denial. Further, states that there is no evidence related to this file that indicates the application was ever ranked in the top 20. The City Clerk further iterates that 85 (eighty-five) applications were received, not 87 (eighty-seven), and the only applicants who were determined to be top 20 were granted conditional approval, Appellant not among them.
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.

* * *

[The] [r]eview of an appeal shall not be de novo. The commission shall only overrule, 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.

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. 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

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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 1300.3(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.
significance, . . . decisive but unreasoned." 6 Capricious is "apt to change suddenly; freakish; whimsical; humorous." 7

The burden is on the party attacking to affirmatively prove the arbitrary and unreasonable decision. 8 This is not to say that a local body may "abrogate constitutional restraints." 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 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. 10 Further, an appellate body will generally not consider issues not raised in or ruled on by a lower review. 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. 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:

6 Id.
7 Id.
9 Id. at 162.
10 See e.g., MCR 7.105(B)(4); (5)(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[,]")
“not limit an individual’s or entity’s rights under the [Michigan Medical Marihuana Act (MMMA)], MMA or the [Michigan Tracking Act (MTA)]” and 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.

Appellant discusses scoring under Marketing, Advertising & Promotion, and directs the reviewers to Exhibit 2. Exhibit 2 consists of several different documents including a Business Plan, Budget Breakdown, Northern Michigan University Affiliation Agreement, a series of checks, and notes related to a charitable donation. The only documentation in this Exhibit pertinent to the scoring in this category would be those contained in the business plan. Appellant essentially argues that it is innovative in its marketing and is being penalized for it. This Hearing Officer fails to see the merit of this argument. First, there is no criteria for which innovation merits more points. Second, the scoring insights indicate that Appellant has several examples but that the Appellant did not provide detail. There is no dispute as to the examples. Third, the remaining issue is the details of said examples. Appellant has not further elaborated on the examples provided in its appeal. Appellant references patient education plans, and community outreach and it should be noted other categories cover these points. Appellant has not met its burden to demonstrate why the original score is invalid under Marketing, Advertising & Promotion.

In its Tangible Capital argument Appellant first addresses that the budget breakdown information was not properly considered. As stated supra, financial information pertaining to other applications is not considered for this location. Information on Exhibit 5 related to

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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(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 Noted that the provided budget breakdown includes addresses that are not the subject of this appeal. The application can only be considered as to the specific location. Information related to other locations cannot be considered.
17 This statement is the same related to Projected Annual Budget and Revenue. Information unrelated to this facility is not dispositive. Further, clear details do not allow the reviewer to determine what pertains to this facility.
locations that are not this location do not persuade this Hearing Officer that a change in calculation is justified or merited. Appellants scoring insights make no mention that Appellant has not met the threshold, rather that appellant is lacking in detail such as proposed improvements to this location. Further, no details were provided as to how block figures breakdown. The City has defined Tangible Capital is needing to be an asset with a physical form, not all items Appellant listed meet this qualification. Appellant in essence argues that it demonstrated it had enough money, but this was not the rationale provided by the City for deducting points in this category.

Under Job Creation, Appellant’s insights state “Applicant indicates 220 Lansing jobs will be created ... but does not provide much detail about them.” Again, Appellant directs to its business plan and subsequent information which includes detail for other locations. Any jobs pertaining to other locations would not be considered under this application. The Hearing Officer’s inquiry in assessing the argument is “how many jobs will this facility create.” Appellant, in its attempt to answer this contradicts itself. It says 220 jobs will be created, but on page 7 of its Business Plan under paragraph nine indicates that “this establishment will create approximately 20 new jobs.” No detail is provided about these jobs. If anything, Appellant’s score in this category reflects a higher score than it perhaps should. However, the City Clerk indicated it is willing to stipulate that the expected number of jobs is 220. 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, this Hearing Officer does not intend to disincentivize the job number stipulation.

Amount and Type of Compensation follows the same arguments. Appellant has provided an hourly rate but does not provide detail that allows the reviewer to see “who, how, when, how much, and what.” Without that information, additional points in this category are not merited.

Addressing Appellant’s Business Experience argument, there is no merit to details related to a stakeholder’s work for Ford or General Motors. Likewise, the experience in construction and real estate is without merit. However, under this category, 10 (ten) years of marihuana retail in the aggregate was required for full point allocation. Information provided in the appeal indicates that 7 (seven) years exist between the stakeholders. Experience as a patient is not counted as experience on the business side of marihuana retail.

As to Content and Sufficiency, Appellant argues that the length of its application should speak for itself. This argument is without merit, and comparatively, Appellant’s application is short. Again, the insights provide that there is an insufficiency of detail. This is the case with the argument on appeal. There is no basis to add points to the score in this category.

Addressing concerns under Buffering, Traffic and Entrance and Exit, Appellant’s distance from residential was not a ¼ mile. Other Applicants also received scores related to the facility’s distance from residential. Appellant references such an applicant, but the other applicant like

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19 Id.
Hilary M. Barnard  
Attorney at Law

Appellant is under the ¼ mile. Appellant asks for a differentiation between the two because Appellant is further, this argument carries no weight. It is not enough for an appellant to “simply announce a position or assert an error[,]”\(^{20}\) Thus leaving the overseer of appeal to “discover and rationalize the basis for his claims, or unravel and elaborate for him his arguments, and then search for authority to either sustain or reject his position.”\(^{21}\) Increased Traffic already has the 4 out of 5 score Appellant argues for, thus this is not being addressed further. There is no dispute that this is a high traffic area, but Appellant makes the argument for its entrance and exit by comparing itself to another Applicant. Then it states that parking must be the reason for the deduction. This is not indicated on the scoring insight. Appellant has not addressed the issue for the score deduction. “Failure to brief a question on appeal is tantamount to abandoning it.”\(^{22}\) Appellant has abandoned its argument here.

In Litigation History, Appellant argues it provided information as requested by ordinance. It appears from the scoring sheet that it was determined that a complete history was provided. There appears no information as to why Appellant’s points in this category were deducted, but the sheet cites that the ability to determine acts detrimental to security, safety and morals is insufficient. This Hearing Officer agrees with Appellant’s argument and recommends that Appellant receive full points in litigation history.

**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: March 30, 2019

Hilary M. Barnard, Hearing Officer


\(^{21}\) Id.

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.

Exhibits

- Exhibit 9 – 2 pages removed. Aerial views were not part of the original application, nor were the documents created using the link to the zoning map and measuring tool available on the City of Lansing Medical Marihuana website
- Exhibit 12
- The denial letter listed in the Exhibit Table of Contents was not included with the applicant’s appeal in Exhibit 1.
- Exhibits of other applicants’ documents were allowed because they are publically available on the Medical Marihuana Commission website page.

Clarification: there is no evidence this application was ranked in the top 20. Eighty-five applications were received, not 87. The only applicants who have been determined to be in the top 20 are the ones who have been granted conditional approval (19 to date).
Category 1 – Marketing, Advertising & Promotion
Pages 4-5 of Exhibit 2 were in the original application and this is the information which was considered for evaluation of this category. This section did not direct a reviewer to the other sections of the application enumerated in the appeal for additional information to be used for scoring.

Category 2 – Tangible Capital Investment in the City of Lansing
Referencing Exhibit 5
- Not only has the appellant NOT applied for testing or secure transport facility licenses, it is illegal for them to do so under the MMFLA, see MCL 333.27501(6).
- Their proposed Provisioning Center located at 2117 S Cedar St has been denied and refunded.
- While they list figures for the amount of building purchases and construction improvements, there is no detail provided to back up these estimated costs.
- Expenses listed in their appeal on the bottom of page 4 are not all considered to be “tangible”. In that example ONLY the buildout costs and security equipment qualify as tangible.

Category 3 – Integrated Job Creation
While the city will stipulate the expected number of jobs is 220 (reduced their number by 20 jobs for the provisioning center which was denied), their level of detail was determined to be poor. In cases where the applicant met the job number, but provided less than the desired amount of detail they were scored a point lower. This was done consistently with all applicants.

Category 7 – Number of Jobs at the Provisioning Center
In cases where the applicant met the job number, but provided less than the desired amount of detail, they were scored lower. See scoring insights.
Category 8 – Amount and Type of Compensation
See scoring insights. Again, lack of detail.

Category 10 – Projected Annual Budget & Revenue
See scoring Insights.

Category 12 – Business Experience
Combined stakeholder retail marihuana experience of 10 years or more was required to achieve full business experience points.

Category 13 – Content and Sufficiency of Information: Professionalism of Submitted Documentation Including Clear Labeling of Required Items
The 175 page submitted application was much smaller than the average 400+ page submission of other applicants.
April 22, 2019

City of Lansing
Attn: Chris Swope, Master Municipal Clerk
124 West Michigan Avenue
Lansing, Michigan 48933

RE: 3208 MLK Inc. – Application for Medical Marihuana Provisioning Center
Appeal to Medical Marihuana Commission

Dear Clerk:

Enclosed please find a copy of the Applicant’s appeal to the Medical Marihuana Commission.

In an email from Deb Biehler, she indicated our appeal would be tentatively scheduled for appeal hearing on Friday, May 19, 2019. Please be advised that I am unavailable on that day as I will be on vacation from May 11, 2019 returning on May 19, 2019. This trip is prepaid and was booked back in February. Therefore, a different hearing date will be needed.

Thank you,

Sincerely yours,

[Signature]

Aaron D. Geyer
Attorney at Law

ADG/
Encl.
In re: 3208 MLK INC.

Applicant

ADMINISTRATIVE APPEAL TO THE MEDICAL MARIHUANA
COMMISSION PURSUANT TO LANSING ORDINANCE 1300.15(C)

ACTION APPEALED FROM

3208 MLK Inc., a Michigan corporation ("Applicant") applied for licensing to operate a
Medical Marihuana Provisioning Center at 3208 South Martin Luther King Jr. Blvd,
Lansing, Michigan 48910 in December 2017. In November 2018, the Lansing City Clerk
indicated the applicant had scored in the top 20 of the 87 applications that were received.

On March 8, 2019, the Lansing City Clerk notified the Applicant that their score of 79 out
of 100 eliminated the possibility of scoring in the top twenty of the 87 applications that
were received. The Applicant appeals the scoring of their application. (See Exhibit #1)

On April 2, 2019, the Lansing City Clerk notified the Applicant that its’ score was
increased to 80 out of 100 but this score was still insufficient to rank in the top 20 and be
awarded a provisioning center license.

Pursuant to Ordinance Section 1300.15(C), the Applicant has the right to have their
application scoring reviewed by the Medical Marihuana Commission if a written statement
to the Commission is filed with the City Clerk’s Office within thirty (30) days of the date
of the denial letter.

The Applicant seeks review of the scoring of their Medical Marihuana Provisioning Center
application under the rules set forth in the Lansing City Ordinance.

APPLICABLE ORDINANCE FOR REVIEW

1300.15 – LICENSE REVOCATION; BASES FOR REVOCATION; APPEAL OF
38 LICENSE DENIAL.

(C) APPEAL OF DENIAL OF AN APPLICATION OR REVOCATION OF A
LICENSE: The city clerk shall notify an applicant of the reason(s) for denial of an
application for a license or license renewal or for revocation of a license or any adverse
decision under this chapter and provide the applicant with the opportunity to be heard. Any
applicant aggrieved by the denial or revocation of a license or adverse decision under this
chapter 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. The review on appeal of a denial or revocation or adverse action shall be by the commission pursuant to section 1300.3. Any decision by the commission on an appeal shall be final for purposes of judicial review. The clerk may engage professional experts to assist with the proceedings under this section 1300.15.

REVIEW PROCEDURES

The review of an appeal shall not be de novo (from the beginning). Instead, they may overturn or modify a decision or finding of the Clerk if it finds the decision to be arbitrary or capricious and not supported by material, substantial, and competent facts on the whole records considered by the Clerk in arriving at such decision. Lansing Ordinance 1300.3(E)).

INTRODUCTION

The term, “arbitrary” has recently been defined by Michigan Eastern District Federal Court Judge Laurie Michelson, using Black’s Law Dictionary as “not supported by fair, solid, and substantial cause, and without reason given. Cerjanec v FCA US LLC, (ED MI 2018) 2018 US Dist LEXIS 131434 (Decided August 6, 2018).

The examiners have awarded the Applicant a total score of 80 out of 100 points. The Applicant will address each category where a reduction from full point value was given. In each instance, the Applicant will clearly show that the examiner(s) either did not score the category correctly or overlooked the presented materials.

DISCUSSION

The Applicant’s Scoring on the City of Lansing Provisioning Center Ranking dated April 2, 2019 (Exhibit #1) enumerates each scoring category and the presentation of this Statement will follow the same order in the Scoring.
1. MARKETING, ADVERTISING AND PROMOTION – MINIMIZATION OF EXPOSURE TO MINORS
TOTAL POSSIBLE POINTS AVAILABLE: 4
POINTS AWARDED: 2

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes indicate “Applicant provides several marketing, advertising and promotional examples and one minor prevention example (e.g. no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn’t get into much more detail. Lacks sufficient details and minor prevention examples.

DISCUSSION: To effectively market, advertise and promote a medical marijuana provisioning center, one must look beyond the traditional modes of print and digital advertisements. The Applicant’s Marketing Plan, contained in their Business Plan, actually listed multiple avenues to accomplish this goal. Marketing, advertising and promotion of a medical marijuana provisioning center involves much more than simply placing ads. Applicant would keep its corporate “brand” visible through sponsorship of community and industry causes (Business Plan - Page 12) (See Exhibit #2). Applicant will be actively involved in community relations that helps build brand awareness among local citizens who may also be customers (Business Plan - Page 5) (See Exhibit #2). Applicant expects to partner with the local community and local coalitions to inform the community about medical cannabis issues, which partnership informs these community members of Applicant’s storefront, further helping the Applicant’s marketing efforts (Business Plan - Page 10) (See Exhibit #2). Applicant will be providing classroom education to university students in conjunction with Northern Michigan University, which education sessions spread brand awareness to these students (Business Plan – Page 1) (See Exhibit #2). Applicant will be holding or participating its community meetings as part of our community outreach program which further spread brand and store visibility to local citizens (Business Plan - Page 10) (See Exhibit #2). Applicant will be holding education programs and workshops to benefit the community, which programs and workshops are sponsored by the Applicant and are a natural marketing avenue (Business Plan - Page 11) (See Exhibit #2). Applicant will be providing literature to all of our patients with our Patient Education Handbook (See Exhibit #3). Applicant would offer community outreach and community benefit programs to the financially disadvantaged, which reinforces the social justice to the public and furthers the Applicant’s marketing efforts and brand awareness (Business Plan - Page 12) (See Exhibit #2). In this paragraph alone, Applicant has cited seven good examples of marketing and advertising that the examiner did not take into consideration when awarding the given score. There is no explanation why the Applicant deficiency addressed this point. Simply because the Applicant has chosen non-traditional methods does not mean the Applicant cannot be successful.

In addition, the Applicant’s Business Plan – directed specifically to marketing, stated the following:

It is expected that 3208 MLK Inc. will spend over $70,000 annually for the first year using the following marketing options:
A. The proposed marketing plan starts with a proper Website with detailed information. 3208 MLK Inc. will utilize Search Engine Optimization (SEO optimization). **SEO will position of our website and will help eliminate exposure of any marketing or promoting marihuana products to minors.**

B. 3208 MLK Inc. will hold business events and conferences. This will improve community relations by providing educating the public.

C. 3208 MLK Inc. will utilize alternative online advertising options including Mantis, 420 Network, 420 Click and Women Grow. These sites are known in the cannabis culture, again eliminating marketing exposure to children.

D. 3208 MLK Inc. will advertise in thematic magazines including Dope, Cannabis Now, 420 Magazine, Marijuana Venture and MG Magazine. This also allows for specific marketing to an adult target audience within the cannabis culture.

E. 3208 MLK Inc. will not market, advertise or sell **ANY** product that appeals to minor children such as “gummy bears”.

Applicant’s marketing plan not only includes advertisement placement, it includes marketing from the inside out. Applicant would be hiring new employees as part of a marketing plan in addition to providing its work force (Business Plan - Page 7) **(See Exhibit #2)**. Hiring local employees is beneficial for many reasons. Hiring from the local talent pool signals to customers and clients that one is a true citizen of the community and that breeds customer loyalty, a crucial part of any marketing efforts. All of these examples were excluded from scoring.

As for minor prevention methods, first and foremost is that in order to gain admittance to Applicant’s facility, the customer must show a valid patient/caregiver ID card and a valid state identification (Business Plan - Page 18) **(See Exhibit #2)**. Not only does Applicant not market to youths, Applicant will not sell to them as well. Applicant will be advertising in thematic magazine developed to target adults to minimize the possibility of advertising to minors (Business Plan – Page 5) **(See Exhibit #2)**. Applicant will not market to or advertise any product that appeals to children – such as “gummy bears” (Business Plan – Page 5) **(Exhibit #2)**. Again, in this paragraph, Applicant has cited 3 examples of minor prevention, all of which were excluded from scoring considerations.

The Applicant is one part of the FMJRL family of companies. Within the FMJRL family of companies, applications on behalf of two provisioning centers were submitted. For each provisioning center, the same materials were presented. By comparison, 2117 Cedar Inc. scored 3 points for this category while the Applicant only received 2 points. Using identical Business Plans, 2117 Cedar Inc. received 3 points while this Applicant received only 2
points. The same comments were made for both entities however 2117 Cedar Inc. received an extra point. (See Exhibit #4) This discrepancy highlights the arbitrariness and capriciousness, as well as a lack of consistency, of the process and the evaluators.

In conclusion, the Applicant’s Business Plan details SEVERAL marketing and minor prevention techniques. The fact that the Business Plan cites at least 7 examples of business advertising but only 2 are acknowledged demonstrates the award is not based on the materials submitted and a review of the record as a who.e. For this category, the Applicant should have been awarded 4 points instead of 2 points.

02. TANGIBLE CAPITAL INVESTMENT IN THE CITY OF LANSING
TOTAL POSSIBLE POINTS AVAILABLE: 15
POINTS AWARDED: 12

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes indicate an original full-point score of 15 points citing a $27.8 million investment associated with integrated operations.

DISCUSSION: On March 5, 2019, the Applicant’s score was reduced by 3 points stating, “[the] Applicant does not provide any detail or supporting documents other than land contracts.” This is clearly an incorrect statement. The second page of a 175-page presentation outlined the budget breakdown and proposed master plan. Within the Applicant’s Budget are details for a grow facility, two processing facilities, a testing facility, a research and development facility, a secure transportation facility, and two provisioning centers. In total, the capital investment to the City of Lansing is estimated at $29,795,000. (See Exhibit #5).

For their budget, the Applicant clearly stated their expected investment expenditures for the first year (exclusive of the cost of real property acquisition) as:

<table>
<thead>
<tr>
<th>Type of Expense</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expected Buildout Costs</td>
<td>$700,000.00</td>
</tr>
<tr>
<td>Security Equipment</td>
<td>$50,000.00</td>
</tr>
<tr>
<td>Legal Expenses</td>
<td>$35,000.00</td>
</tr>
<tr>
<td>Administrative Expenses</td>
<td>$24,000.00</td>
</tr>
<tr>
<td>Sales and Marketing</td>
<td>$75,000.00</td>
</tr>
</tbody>
</table>

(Business Plan – Page 7) (See Exhibit #2)

Clearly, the Applicant’s materials have been overlooked (not simply expressed as one line for projected income and one line for projected costs). For this category, the Applicant should have been awarded their original 15 points instead of 12 points.
03. JOB CREATION (OVERALL NUMBER OF JOBS CREATED)
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes
disclose that the "Applicant indicates 240 Lansing jobs will be created by their medical
marihuana operations but does not provide much detail about them.

DISCUSSION: The Applicant not only details the number of Lansing jobs to be created,
the Applicant goes into particular detail about where and how such jobs would be created.
In contrast to the Scoring Insight, the Applicant actually breaks down how the 240 jobs
would be created, category by category. As "detailed" in the Business Plan, the Applicant
expects to create 240 Lansing jobs. For the provisioning center personnel, 20 new jobs will
be filled as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

This will account for 20 of the 240 jobs (Business Plan - Page 7) (See Exhibit #2). This
also sets forth which jobs will be paid on an hourly basis and which jobs will be paid on a
salary basis. As for the hourly rate, the Business Plan clearly delineates the fact that hourly
employees will be paid between $15.00 - $50.00 per hour based on the job involved and
the level of skill, education and experience of the employee. (Business Plan – Page 7)(See
Exhibit #2).

The proposed build out of the provisioning center would add approximately 50 new
construction employees (Business Plan - Page 7) (See Exhibit #2).

In addition, the Applicant’s Parent Company will be seeking licensing for a Medical
Marihuana Grow facility, two Medical Marihuana Processing facilities, a Testing facility,
a Transportation facility and a Research and Development facility, that will add another
220 new jobs to the Lansing economy (Business Plan - Page 7) (See Exhibit #2). Since the
business plan involves hiring from the local talent pool, of the 270 total jobs created,
Applicant estimated that 240 would come from the Lansing market, whether they are
temporary, part-time or full-time.
For this category, the Applicant should have been awarded 5 points instead of 4 points.

7. NUMBER OF JOBS AT THE PROVISIONING CENTER
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes stated, “Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of detail.”

DISCUSSION: The Applicant has painstakingly addressed the number of jobs to be filled at its provisioning center. The Applicant has defined who the employees are, what role they will have, and how they will be compensated. As detailed in the Business Plan, Applicant expects to create several new Lansing jobs. For our provisioning center personnel, 20 new jobs will be filled as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandise Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

See Business Plan - Page 7 (See Exhibit #2). The proposed build out of the Provisioning Center would add approximately 50 new construction employees (Business Plan - Page 7) (See Exhibit #2).

The Medical Marijuana Provisioning Center Scoring Criteria that was originally made available to applicants in November 2017 (See Exhibit #7) indicated that a maximum of 5 points would be available based on the number of jobs created at the provisioning center. The Applicant indicated that 20 new jobs would be made available. Clearly the award of points would be on a sliding scale based on the number of jobs offered. Therefore, the minimum score for this category must be 4 points.

To earn the extra point, the Applicant has provided their business function and indicated how they are to be compensated. The Applicant’s Business Plan sets forth the identity of these new employees who would be employed directly at the facility, and also indicated
whether the employee would be paid on an hourly or salaried basis.

If the Applicant had simply stated they would hire 20 employees that would merit an award of 4 points. Since the Applicant not only set forth the number of employees they would hire, they identified the job each employee occupy and indicated whether that employee would be paid on an hourly or salaried basis. That provides sufficient detail to merit a full score of 5 points.

8. AMOUNT AND TYPE OF COMPENSATION
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 1

EXPLANATION GIVEN FOR POINTS AWARDED: The Scoring Insight notes disclosed the following: “Applicant states that the provisioning center employees will earn between $15 and $50/Hour but does not provide an optimal amount of support detail.”

DISCUSSION: As detailed in the Applicant’s Business Plan, Applicant expects to have approximately 20 provisioning center employees. For our provisioning center personnel, the breakdown of those newly-created positions are as follows:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

As can be readily seen, the first seven positions are salaried positions and would not be covered by the $15.00 - $50.00/hour rate (Business Plan - Page 7) (See Exhibit #2). These positions would be compensated based on education, experience and suitability for the position.

Along with Municipal Ordinance, in November 2017 the City Clerk published a Medical Marihuana Provisioning Center Scoring Criteria (See Exhibit #6) outline.

| Job creation | Number of jobs at the provisioning center | 5 |
|              | Amount of compensation                  | 2 |
|              | Percent of employees earning over $15 per hour | 3 |
|              | Projected annual budget and revenue      | 2 |
For the sub-category entitled “Amount and Type of Compensation”, there is no subjectivity to this scoring. The “amount of compensation” required a response indicating an amount. As for the type of compensation, the acceptable responses would have been either hourly or salaried.

The Applicant clearly stated for their hourly employees, compensation will be paid at an hourly rate of between $15.00 and $50.00 per hour depending on the position and the relative experience of the employee. It is to be expected that employees working at the same position will earn different hourly amounts based on their skills and abilities. Hence the Applicant has stated a range of hourly rates depending on the particular employee’s ability and skill.

The “scoring insights” describing the deduction from full scoring as lacking “an optimal amount of support details”. This is inconsistent with the category itself. There is no subjectivity to the scoring of this sub-category. Again, the category did not ask for a description – simply an amount.

In conclusion, the Applicant’s Business Plan detailed exactly what was asked. For this category, the Applicant should have been awarded 2 points instead of 1 point.

10. PROJECTED ANNUAL BUDGET AND REVENUE
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 1

EXPLANATION GIVEN FOR POINTS AWARDED: The notes to the scoring reflect, “the Applicant provides a single line item number for annual budget and revenue (e.g. $1.02 million in expenses and 1.2 million in revenue) but no other information”. The “scoring insights” deducted 1 point as it “lacks sufficient details”.

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria (See Exhibit #6) for this variable were stated as follows:

<table>
<thead>
<tr>
<th>Job creation</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of jobs at the provisioning center</td>
<td>5</td>
</tr>
<tr>
<td>Amount 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>
</tbody>
</table>

The “projected annual budget and revenue” required a response indicating an amount. In good faith, the Applicant projected their annual revenue at $1,200,000. This was consistent with their size and proposed location.

For their budget, the Applicant first considered their total investment: expenditures for the first year (exclusive of the cost of real property acquisition) as:
Expected Buildout Costs $700,000.00
Security Equipment $ 50,000.00
Legal Expenses $ 35,000.00
Administrative Expenses $ 24,000.00
Sales and Marketing $ 75,000.00

(Business Plan – Page 7) (See Exhibit #2)

When one factors in the costs for rent, utilities, salaries and other operating expenses, an annual budget of $1,020,000 is a realistic and calculated amount. Rather than arbitrarily selecting figures that might impress the reviewing authorities, the Applicant has clearly stated an amount for annual revenue and expenses.

For this category, the Applicant should have been awarded 2 points instead of 1 point.

12. BUSINESS EXPERIENCE
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” deducted 1 point stating “the Applicant indicates they have 2+ years as a medical marihuana caregiver, plus decades of business experience (e.g. business management, pharmacy, book keeping). Lacks the optimal amount of applicable business experience.

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria for this variable were stated as follows:

Business Experience

<table>
<thead>
<tr>
<th>Description</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<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>5</td>
</tr>
</tbody>
</table>

For cumulative experience, the Applicant has 10 years experience. Joseph Aiello has five years experience in medical marihuana (City of Ferndale municipal licensing issued in 2014), Frank Mastroianni has two years medical marihuana experience with his medical marihuana facility in Warren, Margaret Carter has 2+ years experience as a medical marihuana patient, and Sara Mokoski has 1 year experience as a medical marihuana patient. These facts were clearly set out in the Resume re Marihuana Experience (See Exhibit #7).

This is in addition to the “decades of business experience” running multi-million-dollar entities. For almost 20 years, Joseph Aiello was a design engineer for Ford Motor Company, General Motors and Chrysler Corporation. For 10 years, he managed government contracts with the United States Army. He manages his own multi-million dollar engineering company (Manatee Engineering Services).
His partner, Frank Mastroianni, has more than 10 years experience in the real estate construction field and more than 15 years experience in the real estate sales market. Mr. Mastroianni was granted a municipal license in Warren to operate a medical marihuana facility.

For this category, the Applicant should have been awarded 5 points instead of 4 point.

13. CONTENT AND SUFFICIENCY OF INFORMATION; PROFESSIONALISM OF SUBMITTED DOCUMENTATION INCLUDING CLEAR LABELING OF REQUIRED ITEMS
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate “lacks detail in jobs, budget, TCI.”

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria examines the overall presentation of the materials submitted by the Applicant. The Applicant submitted over 175 pages of material, with color illustrations, in a bound folder. On the exterior of the folder was an artist rendering of the proposed facility. There was a Table of Contents with tab dividers to allow easy access to any portion of the application. There was a budget breakdown including a proposed Master Plan for the various medical marihuana facilities sought by the Applicant’s parent company (FMJRL, Inc.)

The Scoring Criteria evaluated: (1) Ownership structure, (2) Organizational chart, (3) Worker training program, (4) Short-term and long-term goals and objectives, and (5) Community outreach & education. The “scoring insights” had the following remarks - “Table of Contents, org chart, short and long term goals & outreach”. The “scoring insights” addressed each of the scoring criteria and noted the application met or exceeded the requested items.

For this category, the Applicant should have been awarded 5 points and not 4 points.

14. BUFFERING BETWEEN RESIDENTIAL ZONED AREAS AND ESTABLISHMENT
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 3

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” deducted 2 points indicating the property was located 535 feet from residential zoning which falls short of the optimal distance of ¼ mile (1320 feet) to receive full points.
DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria for this variable were stated as follows:

Impact on neighborhood Buffering between residential zoned areas and establishment

The buffering of a Medical Marijuana Provisioning Center was set forth by the municipal ordinance, stating as follows:

1300.13 – LOCATION, BUFFERING, DISPERSION, AND ZONING REQUIREMENTS FOR MEDICAL MARIHUANA PROVISIONING CENTERS.

(A) EXCEPT IN ACCORDANCE WITH SECTION 1300.18, FOR BUFFERING AND DISPERSION PURPOSES, NO MEDICAL MARIHUANA PROVISIONING CENTER SHALL BE LOCATED WITHIN:

(1) ONE THOUSAND (1000) FEET, OF AN OPERATIONAL SCHOOL, INCLUDING PRE-KINDERGARTEN THAT IS LOCATED WITHIN A SCHOOL; OR

(2) FIVE HUNDRED (500) FEET, OF THE FOLLOWING BUFFERED USES: PUBLIC PLAYGROUND EQUIPMENT LOCATED IN A PARK; A COMMERCIAL CHILD CARE ORGANIZATION (NON-HOME OCCUPATION) THAT IS REQUIRED TO BE LICENSED OR REGISTERED WITH THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES, OR ITS SUCCESSOR AGENCY, A CHURCH; A FACILITY AT WHICH SUBSTANCE ABUSE PREVENTION SERVICES OR SUBSTANCE ABUSE TREATMENT AND REHABILITATION SERVICES AND THOSE TERMS ARE DEFINED IN PART 61 OR PA 368 OF 1978, MCL 333.6101 ET SEQ., ARE OFFERED; OR ANOTHER MEDICAL MARIHUANA PROVISIONING CENTER.

(B) MEDICAL MARIHUANA PROVISIONING CENTERS SHALL BE LIMITED TO F AND F1-COMMERCIAL, G2-WHOLESALE, H-LIGHT INDUSTRIAL, AND I-HEAVY INDUSTRIAL AS SUCH DISTRICTS ARE DESCRIBED AND DESIGNATED AS PROVIDED IN THE ZONING CODE PROVISIONS OF THE LANSING CODIFIED ORDINANCES.

(C) NO MEDICAL MARIHUANA PROVISIONING CENTER SHALL BE LOCATED WITHIN ANOTHER BUSINESS EXCEPT AS PERMITTED BY THE MEDICAL MARIHUANA LICENSING BOARD REGULATIONS.

The scoring criteria focus uses the phrase “residential zoned areas” (plural). A plain reading of the scoring criteria and the applicable ordinance must therefore focus on the enumerated factors in the ordinance itself – (Ordinance 1300.13(A)) setbacks from schools, libraries, playgrounds, childcare, churches and substance abuse.
prevention centers. Clearly setbacks for schools, libraries, playgrounds, childcare facilities, places of worship and substance abuse prevention centers relate to residential-related services (as opposed to commercial-related services). If the scoring criteria was made known that location to residential housing would be considered, the Applicant would not have bought property in that area and would not have submitted an application for licensing at that location.

Verified by submitted maps measuring the distances, the Applicant satisfied all of the stated buffering requirements: (see Location and Distance from Buffered Areas)(See Exhibit #9)

<table>
<thead>
<tr>
<th>Allowed</th>
<th>Actual</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distance</td>
<td>Distance</td>
</tr>
<tr>
<td>School</td>
<td>1,000</td>
</tr>
<tr>
<td>Library</td>
<td>500</td>
</tr>
<tr>
<td>Playground</td>
<td>500</td>
</tr>
<tr>
<td>Commercial childcare</td>
<td>500</td>
</tr>
<tr>
<td>Church</td>
<td>500</td>
</tr>
<tr>
<td>Substance abuse prevention</td>
<td>500</td>
</tr>
</tbody>
</table>

A comparison of the actual distances with the setback distances show the following multiplied distances from the required setbacks:

<table>
<thead>
<tr>
<th>Actual</th>
<th>Distance</th>
<th>Distance</th>
</tr>
</thead>
<tbody>
<tr>
<td>School</td>
<td>1,417</td>
<td>4.12 times</td>
</tr>
<tr>
<td>Library</td>
<td>5,833</td>
<td>9.57 times</td>
</tr>
<tr>
<td>Playground</td>
<td>1,696</td>
<td>7.86 times</td>
</tr>
<tr>
<td>Commercial childcare</td>
<td>1,115</td>
<td>3.67 times</td>
</tr>
<tr>
<td>Church</td>
<td>1,030</td>
<td>3.72 times</td>
</tr>
<tr>
<td>Substance abuse prevention</td>
<td>2,762</td>
<td>3.44 times</td>
</tr>
</tbody>
</table>

From the foregoing chart, the Applicant is located at least three and one-half times the distance to the nearest setback. Again, residential zoning is not an enumerated setback.

The “scoring insights” indicate the establishment is located 535 feet from residential zoning. According to the Applicant’s calculations (See Exhibit #9), the nearest residential property is located 862 feet to the North and 986 feet to the West of the Applicant’s facility using the measurement tool prescribed by the Clerk.

By comparison, another Applicant, Green Square Holdings LLC received 3 points for being 224 feet. (See Exhibit #10) This Applicant, located at four times further away, received the same score. This discrepancy between these scores further highlights the arbitrariness and capriciousness, as well as a lack of consistency, of the process and the evaluators.

For this category, the Applicant should have been awarded at least 4 of 5 points.
15. INCREASED TRAFFIC ON SIDE STREETS WILL BE SCORED LOWER
TOTAL POSSIBLE POINTS AVAILABLE: 5
POINTS AWARDED: 4

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate
a shared driveway, updated 9/25/18 inadequate in driveways & circulation (change in
score)

DISCUSSION: The objective of this category is to deter a flow of traffic onto side streets
and potentially into residential neighborhoods. There is no traffic onto any side streets. The
Applicant’s facility has only one source of ingress/egress – onto Martin Luther King Jr.
Blvd. As demonstrated in the Applicant’s Site Plan (Exhibit #19) there are 21 available
parking spaces that face the Applicant’s facility including 4 spaces designated for handicap
parking.

As for the other facilities, there is no indication their use of a shared driveway would impact
the customer’s ability to enter or exit onto South Martin Luther King Jr. Blvd. The
driveway for ingress/egress is a double driveway with the commercial property to the North
that would not restrict the flow of traffic on South Martin Luther King Jr. Blvd. (Exhibit
#11)

For this category, the Applicant should have been awarded at least 4 of 5 points.

16. ENTRANCE AND EXIT ON MAIN STREETS, ADEQUATE PARKING NOT ON
RESIDENTIAL STREETS, QUALITY OF SECURITY PLAN
TOTAL POSSIBLE POINTS AVAILABLE: 10
POINTS AWARDED: 6

EXPLANATION GIVEN FOR POINTS AWARDED: The “scoring insights” indicate
Tier 2, 2 pts. for Security Plan, Tier 2, traffic 4 pts, strong traffic patterns and parking.
Update 9/25/18 inadequate in driveways & circulation (change in score)

DISCUSSION: To address the entrance and exit on main streets, the facility faces South
Martin Luther King Jr. Blvd and the only way to enter or exit the property is directly onto
South Martin Luther King Jr. Blvd. Therefore, there should have been no deductions based
on the ingress/egress onto any side streets as there are no adjacent side streets.

Again, FMJRL (Applicant’s parent company) presented applications on behalf of two
Medical Marihuana Provisioning Centers – 2117 Cedar Inc. and 3208 MLK Inc. Both
entities submitted the same Security Plan. By comparison, 2117 Cedar Inc. was awarded 7
points. That can only indicate the one-point variance has to do with the adequacy of parking
since all of the other factors are the same.
To address the adequacy of parking, the facility has 21 available parking spaces that face the Applicant’s facility including 4 spaces designated for handicap parking. Under the Americans with Disabilities Act (ADA), the minimum number of accessible parking spaces depends on the total number of parking spaces in the lot. Where there are less than 26 spaces, only one space is required to be accessible. This Applicant has set forth 4 available accessible spaces in the Applicant’s Site Plan (See Exhibit #11). The adequacy of the Applicant’s parking demonstrates there is no basis to distinguish between the application of 2117 Cedar Inc, (that received 7 points) and the Applicant (that only received 6 points). The fact that two identical applications were scored differently highlights the arbitrariness and capriciousness, as well as a lack of consistency, of the process and the evaluators.

As noted by the examiners, there are commercial establishments to the immediate North and South and there is no exit from the rear of the facility. The only way to enter or exit the facility is onto South Martin Luther King Jr. Blvd. As such, there can be no parking on residential side streets and no basis for a one-point variance between the two facilities.

As for the Applicant’s Security Plan, video cameras are kept off site with cloud storage. There will be biometric controlled access to secure areas. The safe is a Cannon Wide Body 64-Gun Safe that is not located on an exterior wall (diagramed in the Applicant’s Floor Plan) to prevent crash and dash entry. The alarm system is monitored by Nest. There will be on-site security. Finally, the medical marihuana is ordered and delivered using a Zivelo kiosk system to monitor product purchases.

For this category, there is absolutely no basis for a 4-point deduction to the Applicant’s score.

24. BUSINESS LITIGATION HISTORY
TOTAL POSSIBLE POINTS AVAILABLE: 2
POINTS AWARDED: 1

EXPLANATION GIVEN FOR POINTS AWARDED: All stakeholders have a complete litigation history with no or minimal issue. It does not include personal history. Updated 11/28/18 after further review, “no record of acts of detrimental to security, safety, morals … is determined insufficient.”

DISCUSSION: The Medical Marijuana Provisioning Center Scoring Criteria (See Exhibit #6) for this variable were stated as follows:

<table>
<thead>
<tr>
<th>Applicant/stakeholders attendance</th>
<th>Lansing Police Department complaints/incidents</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>record of acts detrimental to security, safety, morals</td>
<td>Demonstration of regulatory compliance</td>
<td>2</td>
</tr>
<tr>
<td>good order, general welfare</td>
<td>Business litigation history</td>
<td>2</td>
</tr>
</tbody>
</table>

The category requests information regarding business litigation history. The Ordinance in question - 1300.6(B)(4) states the following:
(4) Whether the applicant or any of its stakeholders have a record of acts detrimental to the public health, security, safety, morals, good order, or general welfare prior to the date of the application; Whether the applicant or any of its stakeholders have previously operated an illegal business of any kind, including any violation of Lansing Medical Marihuana Moratoriums. The maximum number of scoring points in this category shall be ten (10) points;

To address this requirement, the Applicant submitted a statement containing the following:

**DETRIMENTAL ACTS TO SECURITY, SAFETY, MORALS, GOOD ORDER, AND GENERAL WELFARE**

**FRANK MASTROIANNI**, states the following:

1. I am a Director of 3208 MLK Inc. and have the authority to issue this statement.

2. The Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation has submitted an Application for a Medical Marihuana Licensure to operate a provisioning center at 3208 Martin Luther King Jr. Blvd, Lansing, Michigan 48910.

3. The Applicant and the stakeholders of the Applicant have no record of acts detrimental to security, safety, morals, good order or general welfare.

4. The Applicant and the stakeholders of the Applicant have no record of any complaints or incidents with the Lansing Police Department.

5. The Applicant and the stakeholders of the Applicant have no record of any business litigation history.

6. The Applicant has committed no violations of the 2016 Ordinance #1202 Moratorium.

\[s/ \text{Frank Mastroianni}\]
Frank Mastroianni, Director
3208 MLK Inc.

*(See Exhibit #14).*

The Applicant has directly complied with the Ordinance, responded questions asked by the Ordinance and received zero points. Clearly Paragraph 5 indicates the Applicant and the Stakeholders have no record of any business litigation history. If you provide the information requested, how can that be construed as “insufficient”?
In the notes, it is reflected “Clerk added one point to this category because a litigation history was submitted for one of the two stakeholders” JSZ.” The statement submitted by Mr. Mastroianni addressed BOTH stakeholders. The language in Paragraph 5 clearly uses the phrase “the Applicant and the Stakeholders”.

For this category, the Applicant should have been awarded 2 points instead of 1 point.

CONCLUSION

The Applicant has addressed each category where a reduction from full-point value was given. In each instance, the Applicant has clearly shown that the examiner either did not score the category correctly or overlooked the materials presented.

Based on the foregoing, a correction must be made awarding the applicant additional points.

Respectfully,

[Signature]

Aaron D. Geyer
Attorney for Applicant

Prepared by
AIELLO & ASSOCIATES, PLLC
Aaron D. Geyer (P-39889)
Attorney at Law
32411 Mound Road
Warren, Michigan 48092
Tel. (586) 303-2211
Fax. (586) 303-1259
aaron@chrisaiello.com
# EXHIBITS

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1. Denial Letter from Lansing City Clerk with Application Scoring (received 04/02/19)

2. Applicant’s Business Plan (originally submitted)

3. Patient Education Handbook (originally submitted)

4. Application Scoring for 2117 Cedar Inc. (dated 1/16/2019)

5. Budget Breakdown (originally submitted)


7. Applicant’s Resume Regarding Experience with Medical Marihuana or a Related Industry

8. Location and Distance from Buffered Areas

9. Maps showing distance to nearest residential zoning. (Not being offered as new evidence but introduced to rebut a false statement)


11. Applicant’s Site Plan

12. Photo showing Applicant’s parking lot. (Not being offered as new evidence but introduced to rebut a false statement)
13. **Applicant’s Land Use and Effect on Traffic Patterns.**

----- Forwarded Message -----  
From: Biehler, Deb <Deb.Biehler@lansingmi.gov>  
To: Frank Mastroianni <frankmastroianni@ymail.com>; Christopher Aiello <Chris@chrisaiello.com>  
Cc: Swope, Chris <Chris.Swope@lansingmi.gov>; Jackson, Brian <Brian.Jackson@lansingmi.gov>; Smith-Zande, Jennifer <Jennifer.Smith-Zande@lansingmi.gov>  
Sent: Tuesday, April 2, 2019, 10:33:46 AM EDT  
Subject: 3208 MLK Inc. Provisioning Center Update

April 2, 2019

3208 MLK Inc.
32411 Mound Road
Warren, Michigan 48092

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 3208 Martin Luther King Jr Blvd. Your score after appeal is 80, which eliminates the possibility of ranking in the top 20, therefore I have determined your appeal is denied. One point was added for submitting a Litigation History on one of the two stakeholders in your application.

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.

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, CMMC
City Clerk

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

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
Lansing City Clerk
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>3208 MLK INC</th>
<th>3208 S MARTIN LUTHER KING JR BLVD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>---</td>
<td>3208 S MARTIN LUTHER KING JR BLVD</td>
<td>3208 S MARTIN LUTHER KING JR BLVD</td>
</tr>
</tbody>
</table>

### Scoring Insights

<table>
<thead>
<tr>
<th>1. Marketing, Advertising and Promotion</th>
<th>4</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $300K, $1 million startup costs) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh). UPDATE: Changing the land contract from $300K to $200K does not impact the original score of 15 since the applicant indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh and does include a PC at 2117 S. Cedar Street.). Even taking into account the other PC, applicant still well above the $1 million TCI threshold. Suggestion: No change of the score is recommended. 3/5/2019 - Applicant does not provide any detail or supporting material other than land contracts. There is no budget for the proposed property improvements, just a dollar amount. Their budget is 2 lines - one for projected income, one for projected costs. No explanation of either.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2. Tangible Capital Investment in the City of Lansing</th>
<th>15</th>
<th>12</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center (land contract for $300K, $1 million startup costs) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh). UPDATE: Changing the land contract from $300K to $200K does not impact the original score of 15 since the applicant indicates $27.8 million investment associated with integrated operations (including &gt;$2 million for R&amp;D property at 1520 E. Cavanaugh and does include a PC at 2117 S. Cedar Street.). Even taking into account the other PC, applicant still well above the $1 million TCI threshold. Suggestion: No change of the score is recommended. 3/5/2019 - Applicant does not provide any detail or supporting material other than land contracts. There is no budget for the proposed property improvements, just a dollar amount. Their budget is 2 lines - one for projected income, one for projected costs. No explanation of either.&quot;</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. Job Creation (Integrated System) Overall number of jobs created</th>
<th>5</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates 220 Lansing jobs will be created by their medical marihuana operations but does not provide much detail about them.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>4. Financial Structure and Financing</th>
<th>3</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and liquid assets availability of &gt; $1.65 million.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. Plans to Integrate Facility with Other Establishments</th>
<th>2</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates they intend to integrate their initial provisioning center with a 1,500 plant, 27,000 sq. ft. grow facility. Other future operations.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>6. Charitable Plans and Strategies</th>
<th>4</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes, indicates they have been selected by Northern Mi University to educate students (includes legal agreement form). Lacks proof of actual payment or an executed agreement.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7. 'Number of Jobs at the Provisioning Center Category Thresholds: 1 = &lt; 6 jobs, insufficient details; 2 = &lt; 6 jobs, sufficient details; 3 = 6 jobs, sufficient details; 4 = &gt; 6 jobs insufficient details; 5 = &gt; 6 jobs, sufficient/good details.</th>
<th>5</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Falls short of an optimal level of clear details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Amount and Type of Compensation (PC)</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<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>
</tr>
<tr>
<td>10. Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>12. Business Experience</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>13. Content and Sufficiency of Information; Professionalism of submitted documentation including clear labeling of required items</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td>4</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>6</td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations,</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>18. Improvements made or proposed to building</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>19. Plan to minimize/eliminate traffic</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>20. Plan to minimize/eliminate noise</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>21. Plan to minimize/eliminate odor</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>22. LPD Complaints</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>23. Demo of Regulatory Compliance</td>
<td>4</td>
<td>4</td>
</tr>
</tbody>
</table>

-165-
<table>
<thead>
<tr>
<th>24. Litigation History</th>
<th>2</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Score</strong></td>
<td>100</td>
<td>80</td>
</tr>
</tbody>
</table>

"All stakeholders have a complete business litigation history with no or minimal issue. It does not include personal history 11/26/2018. Updated 11/28/18 after further review, ""a record of acts of detrimental to security, safety, morals..."" is determined insufficient. 4/2/2019 - Clerk added one point to this category because a litigation history was submitted for one of the two stakeholders. JSZ""
EXHIBIT 2
BUSINESS PLAN

This is the written BUSINESS Plan for 3208 MLK Inc. ("We", "Us", "Our"). This plan addresses and meets the application requirements of the City of Lansing’s Medical Marihuana Ordinance for the regulation and licensing of Medical Marihuana Establishments.

1. Executive Summary – Mission Statement

The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients. We want to provide greater access to the medicinal effects cannabis can bring to those in need. At 3208 MLK Inc., we will always put our patients first. Our staff is knowledgeable of industry and licensing regulations. We continually attend industry seminars and workshops to stay current with evolving regulations. We are here to service the community properly, now and in the future.

It’s one thing to say we will have community involvement, it’s another thing to back up those words and promises with FACTS. We have been selected by a major university, Northern Michigan University, to provide programs to students directly related to the medical marijuana industry. We will be providing classroom education to students in the fields of medical marihuana growing, cultivation, processing, and dispensary operations.

Our dispensary will provide our patients with safe products, professionally packaged, and presented in a compassionate, service-focused way in a comfortable setting by well-trained staff. Patient care and education is a key element of our approach, and has to be part of an array of wellness and support services (transportation, interpreters, and care advocates) we offer our patients.

Our dispensary is being designed and built to feature state of the art technology with forward-looking green practices. Security and safety are critical components of our operations. We also plan to take every effort to be “good neighbors” in the community. This means providing extensive community outreach, including hiring and public involvement. It also means minimizing any negative impacts or nuisances that may arise from our operations.

Our key objectives are:

- To provide safe and legal access to medical cannabis for all qualified patients regardless of their ability to pay;

- To reduce the barriers and improve access to medical cannabis and its potential benefits, including the potential to reduce health disparities in underserved and minority residents in Lansing; and

- To revitalize our neighborhood and contribute to Lansing’s wider economic development through job creation, increased tax base, and education and outreach.
Finally, 3208 MLK Inc. has sufficient capital in place to build, secure, and start up the proposed dispensary. We have sufficient capital to cover estimated costs of build, operation, compensation of employees with fringe benefits, equipment costs, utility costs, legal compliance, and other operating and maintenance costs as needed. As requested, we have provided proof of capitalization to cover such amounts.

2. Proposed Ownership Structure of the Establishment:

3208 MLK Inc. is one element in the FMJRL, Inc. family of companies. Frank Mastroianni has a 100% ownership in FMJRL, Inc. and shares a 50% interest in 3208 MLK Inc. with his business partner, Joseph Aiello.

Contemporaneous with this Application, FMJRL subsidiaries will be filing a Medical Marihuana Grower application, a Medical Marihuana Processor application, and another Medical Marihuana Provisioning Center application. You will find that 3208 MLK Inc. along with the other subsidiaries, are highly motivated and highly qualified medical marihuana businesses worthy of the opportunity to do business in the City of Lansing.

3. Current Organization Chart:

Frank Mastroianni – President, Director
Joseph Aiello - Vice President, Treasurer, Secretary, Director

4. Implementation Strategy

3208 MLK Inc. will use a community-driven, patient-centered care approach that will benefit all Lansing residents, including delivering care in a way that makes quality, affordable medical cannabis available to underserved minority, low-income and indigent populations. This complex commitment dictates the features of our implementation strategy:

- Patient-centered care,
- A professional clinical setting,
- Product variety,
- Scientific quality control,
- A skilled and knowledgeable staff,
- Investment in sustainable operations, community outreach, and enabling/support services.

A. Patient-Centered Care

The crucial element of our PCC approach will be meeting our patients where they are: communicating with them in the terms they are comfortable with. This requires that our
staff be well-trained, comfortable with diversity, and competent to interact appropriately with individuals from different backgrounds and levels of "medical literacy." As a "socio-culturally competent" caregiver, 3208 MLK Inc. will educate and empower its patients so that they share responsibility for their own healthcare decision-making and healthy lifestyle choices. Our PCC-focused dispensary will provide:

- A welcoming environment,
- Respect for patients' values and expressed needs,
- Patient empowerment,
- Staff socio-cultural competence,
- Help with coordination of care across providers,
- Emphasis on patient comfort and support, and
- Community outreach and collaboration.

Our staff, facility, and operations will prioritize education and patient empowerment. Maintaining a holistic focus and supportive services, it will seek to identify underlying factors that broadly influence quality of life, with emphasis falling on pain management, avoiding unhealthy behaviors, lifestyle change, improving physical conditioning, adopting better nutritional practices, reducing stress, and taking advantage of the profound mental health benefits that patients can derive from interpersonal support such as counseling, support groups, and community activities with those suffering from similar conditions.

As noted in our discussion above, research has shown PCC to result not only in far higher levels of patient satisfaction with their care, but also in better clinical outcomes and quality of life. While we are not practicing medicine, embracing PCC as the centerpiece of our model puts us ahead of the curve in this rapidly growing trend in healthcare.

B. Professional Clinical Setting

The compassionate cause of medical cannabis is ill served by reminders of the counterculture or association with the image or ethos of the "stoner." Our atmosphere will be designed to move medical cannabis away from any association with the counterculture or even with the casualness of uninformed home cultivation and focus attention on its scientific and medical legitimacy. In keeping with this, our dispensary collective will maintain the professional look and feel of a professional medical service clinic, and the fact that our products are scientifically cultivated and tested will be the key element in our strategy on which we plan to build public awareness of our "brand."

C. Strain Variety

Different strains of cannabis have different therapeutic and palliative effects, some offering relief from a given condition more than others. Furthermore, patients with serious medical conditions, such as those with wasting syndrome or undergoing chemotherapy for cancer, can have very specific tolerances, intolerances, and idiopathic
reactions to medication. To offer patients customized and scientifically precise treatment options, it is critical that we provide as wide a variety of strains of medical cannabis and as great a variety of delivery methods as possible. We will also provide a wide range of oils and edibles as soon as we begin our operations.

D. Scientific Quality Control

As discussed below, all our products will be tested for purity and potency by an independent testing laboratory and bear a guarantee of scientific quality control. We will work with our independent lab to provide the best possible product at a fair price.

E. Skilled and Knowledgeable Member Staff

Without a skilled and knowledgeable staff, our product diversity and Patient-Centered Care would be of little benefit to most patients. A crucial feature of our strategy is the extensive training that our staff will undergo to be able to advise patients on such things as the specific effects and side effects of various strains or delivery methods, their benefits for specific medical conditions, and their interactions with other medications, as well as with drugs and alcohol.

Providing patients with types of information they cannot obtain in traditional health care settings conforms with our general strategy of offering something that does not replace traditional health care, but complements it by providing something critically lacking in it. The need for complementary care is particularly evident in the case of medical cannabis because physicians typically recommend only that the patient use it, without specifying the strain or delivery form. This creates a patient information deficit and education need that our approach is designed to address. Because many dispensaries do not take this need seriously enough, our educational approach will quickly distinguish our “brand.”

F. Investment in Community Outreach and Enabling Services

Many states have dispensaries offering a variety of peripheral services on a patient-centered care model. 3208 MLK’s approach builds on successful dispensary models, improves the scope and type of community outreach, and delivers more targeted services that will benefit all Lansing residents.

5. Proposed Marketing, Advertising and Business Promotion Plan:

The success and growth of any business, especially a new business, starts with an effective marketing and advertising plan. Consistent with the promulgated Emergency Rules for the Medical Marihuana Facilities Licensing Act filed with the Secretary of State on December 4, 2017, the Applicant intends to fully comply with Emergency Rule 42.
Rule 42. Marketing and advertising restrictions.

(1) Marihuana facilities shall comply with all municipal ordinances, state law, and these rules regulating signs and advertising.

(2) A licensee shall not advertise marihuana product where the advertisement is visible to members of the public from any street, sidewalk, park, or other public place.

(3) Marihuana products must be marketed or advertised as "medical marihuana" for use only by registered qualifying patients or registered primary caregivers.

(4) Marihuana products must not be marketed or advertised to minors aged 17 years or younger. Sponsorships targeted to members aged 17 years or younger are prohibited.

It is expected that 3208 MLK Inc. will spend over $70,000 annually for the first year using the following marketing options:

A. The proposed marketing plan starts with a proper Website with detailed information. 3208 MLK Inc. will utilize Search Engine Optimization (SEO optimization). SEO will help position of our website will help minimize exposure of marketing or promoting marihuana products to minors.

B. 3208 MLK Inc. will hold business events and conferences. This will improve community relations by providing educating the public.

C. 3208 MLK Inc. will utilize alternative online advertising options including Mantis, 420 Network, 420 Click and Women Grow. These sites are known in the cannabis culture, again minimizing marketing exposure to children.

D. 3208 MLK Inc. will advertise in thematic magazines including Dope, Cannabis Now, 420 Magazine, Marijuana Venture and MG Magazine. This also allows for specific marketing to an adult target audience within the cannabis culture.

6. Verification, Paperwork, and Tracking

A. Verification

Michigan allows patients and their designated caregivers to enroll in an identification program that provides them with a government-issued card identifying them as legally-qualified medical cannabis patients or caregivers. These medical marihuana identification cards allow for easy verification of the cardholder's current eligibility status through a verification system that dispensaries and law enforcement can access. To be eligible for purchase of any medical marihuana product, we will verify the individual's credentials with a state approved identification to verify their identity. Before anyone is allowed into our facility, they must present proper credentials.
B. Paperwork Compliance

All individual patients will be required to complete an application on their initial entry into our location. The patient will have to attest they have read the application, understood it, have answered all questions truthfully, and agree to abide by all rules and requirements of the provisioning center. The individual patient will be met by a qualified staff member who will speak with the individual patient and answer any questions the patient may have. The patient will then be given a Patient Handbook.

C. Tracking

We plan to track all patients, caregivers and sales. For every day, month, quarter, and year, we will track the total number of individuals who visit the dispensary, the number of their visits, and the number, quantity, and type of products sold and on hand for sale, as well as the number of plants or products under cultivation or production. This will allow us to ensure and document for the purposes of regulatory compliance the aggregate amount of medical marihuana in our facility does not exceed allowable limits.

All books, records, and accounts, including those related to membership, will be maintained to comply with applicable laws and regulations.

7. Tax Compliance and Accounting

3208 MLK will comply with local, state, and federal tax requirements. We are well aware of the unique federal tax implications for medical cannabis businesses, and have consulted with appropriate professionals to ensure full compliance with the Internal Revenue Service's treatment of medical marijuana. We understand that for any drug that is considered illegal by the Federal government, including medical marijuana (albeit medically legal according to the State of Michigan), a 1982 tax code prohibits cost deductions for our business. 3208 MLK Inc. has hired a qualified Certified Public Accountant (Paul Samways) that is knowledgeable and capable of timely generating any forms or statements required.

8. Planned Tangible Capital Investment:

A. The total investment required for the first year of operation (exclusive of the cost of real property acquisition) is:

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property Acquisition Costs</td>
<td>$200,000.00</td>
</tr>
<tr>
<td>Expected Buildout Costs</td>
<td>$700,000.00</td>
</tr>
</tbody>
</table>
Security Equipment $50,000.00
Legal Expenses $35,000.00
Administrative Expenses $24,000.00
Sales and Marketing $75,000.00

B. In addition to the application being submitted for this Medical Marihuana Provisioning Center, Frank Mastroianni intends to submit applications for two Medical Marihuana Grow Facilities in the City of Lansing. Each Grow Facility will add approximately 100 new jobs to the area that will have a positive economic benefit to the City.

9. **Expected Job Creation from the proposed Medical Marihuana establishment:**

The licensing of this establishment will create approximately 20 new jobs. It is expected the Applicant will be seeking qualified employees to fill the following jobs:

- Pharmacist (Salary)
- Dispensary Manager (Salary)
- Merchandize Manager (Salary)
- Medical Director (Salary)
- Security Officer (Salary and Hourly)
- Pharmacist technicians (Salary)
- Information Technologist (Salary)
- Budtenders/Sales agents (Hourly)
- Cashier (Hourly)
- Counter Agents (Hourly)
- Cleaners (Hourly)
- Security employees (Hourly)

Each new job created will pay between $15.00 - $50.00 per hour. In addition, Frank Mastroianni (through his entities) will be seeking licenses for a Medical Marihuana Grow operation, a Medical Marijuana Processor operation, and another Medical Marihuana Provisioning center that should add another 220 new jobs. In addition, the proposed buildout of the provisioning center will add approximately 50 construction jobs.

10. **Planned Worker Training Programs:**

3208 MLK Inc. intends to ensure all personnel are properly trained and educated to run a first-class Medical Marihuana Provisioning Center. To accomplish this goal, the staff must:

   a. Understand the rules and regulations imposed by the City of Lansing and the State of Michigan relative to the Michigan Medical Marihuana Act.
This involves educating the staff and making sure they attend seminars to maintain the proper level of proficiency.

b. Understand the needs of the individual patients

c. Understand the floor plan of the dispensary and the various safety and security measures to handle any emergency situation that might develop.

d. Understand all point of sale procedures for any transfers or sales

e. Follow procedures in an employee handbook that will be given to all staff personnel. The handbook communicates business rules and performance standards, encourages employees to behave in a certain way, and helps ensure employees are treated consistently. The handbook also explains employee safety procedures, employee guidelines, security protocols, and educational training.

f. Understand the various products available with their benefits and drawbacks that would be available to patients.

g. Understand product information, dosage and daily limits.

h. Understand the educational materials available for the individual patient and caregivers.

i. Planned worker training includes background checks of employees and requirements that employees immediately report any new or pending criminal charges.

11. **Financial Structure and Financing of the Proposed Medical Marihuana Establishment:**

It is expected that the costs of improvement to the property will cost be approximately $700,000. 3208 MLK Inc., a subsidiary of FMJRL, Inc., is owned by Frank Mastroianni who has the financial resources to improve the proposed medical marihuana establishment without the need to incur new debt. No bank financing will be required.

12. **Building and Construction Plan**

The plans for conversion and upgrade of the existing facility keep several goals in mind:

- Complying with all code requirements,
- Meeting and exceeding safety and efficiency standards specific to the type of operations proposed, and
- Life safety, satisfying all regulatory compliance issues.
The new facility is designed to maximize the safety of our patients, employees, and neighbors, as well as the safety and security of our products. The design incorporates the most environmentally friendly materials and the latest technologies, enabling us to conserve energy and lessen our carbon footprint.

Areas of the lot not covered by the building will be upgraded and used for parking, circulation, and open space. Improvements to the surrounding lot will include repair of deteriorated portions of the pavement and the creation of ample parking spaces. The parking stalls will be marked with 4-inch wide white stripes.

Numerous public improvements will be undertaken landscaping, sidewalk, and lighting improvements.

See Security Plan (Item #14) for security measures being implemented

13. Competitive Advantage, Short-Term and Long-Term Goals and Objectives Consistent with this Chapter:

What sets 3208 MLK apart from other applicants is the economic growth that FMJRL, Inc. can bring to the City. In addition to this Provisioning Center License application, subsidiaries within FMJRL, Inc. will be seeking licensing for a Medical Marihuana Grower, a Medical Marihuana Processor and another Medical Marihuana Provisioning Center. The short-term goals of 3208 MLK Inc. are to commence building improvement once licensing is granted. Operations will commence after the appropriate inspections and certificates have been issued. We have been selected by a major university to educate their students about our industry.

As for our long-term goals, it is the expectation that 3208 MLK Inc. will continue to grow and develop with the community and become an industry standard for other provisioning centers to follow. As for the long-term goals of our parent company, there are developed real estate plans for additional medical marihuana facilities in the City of Lansing if the city allows for expansion. We intend to establish a non-profit enterprise that will work in conjunction with cancer foundations and medical facilities to eradicate cancer in our lifetime. We are here to be YOUR industry leader, someone you can be proud to acknowledge and sponsor.

14. Community Outreach / Education Plans and Strategies:

The mission statement of the South Lansing Community Development Association is to support citizen-driven development by a) providing programs and resources that address community-identified needs, b) empowering local residents and stakeholders to advocate for change, and c) facilitating collaborate efforts to achieve goals. We share the same core values. As part of our marketing strategy, we intend to hold business events and conferences. In conjunction with organizations such as the South Lansing Community
Development Association and the South Side Community Coalition, these goals can be met with the community benefitting from planned programs.

We can PROVE we are serious about education. 3208 MLK (along with the other companies in the FMJRL family) have been selected by Northern Michigan University, an accredited public university established by the Michigan Legislature in 1899, to provide programs to students directly related to the medical marijuana industry. Our curriculum includes classroom education to students in the fields of medical marijuana growing, cultivation, processing, and dispensary operations.

3208 MLK is committed to strong public engagement and outreach to OUR community. Our community outreach has three goals: (i) to establish a process by which the community can express itself regarding the project; (ii) to inform the community about medical cannabis issues; and (iii) to ensure that our approach genuinely reflects the community's needs. To reach our goals, we anticipate doing one or more of the following, depending on input at various stages of the project:

- Identifying a broad cross-section of community-based organizations and community leaders, including those representing indigent and traditionally underserved and underrepresented residents, to learn how residents and stakeholders can best receive useful information that enables them to participate meaningfully.

- Identifying and visiting civic, senior, and veteran organizations, health care support groups, and community meetings to introduce our nonprofit organization, our mission, and our vision for the patient care center. We believe this type of outreach establishes our legitimacy with the community and our vested interest in its welfare. We will listen receptively and respond to any concerns about the project.

- Holding or participating in a community meeting to introduce 3208 MLK Inc. and present the project to any parties with similar goals. Again, our purpose would be to listen and find ways to be responsive. Completing our outreach efforts with a follow-up letter to community stakeholders, letting them know that we heard their concerns and what procedures we will follow in responding to such concerns.

We are committed to engaging our patient and residential communities on an ongoing basis. We will partner with local community organizations to solicit volunteers for these positions.

We are proud of our military community and the services they provide. We are here to serve our active and veterans and give back to those who promised their lives for ours. We have the knowledge and compassion to address the needs of those who suffer with the unpleasant aftermaths of conflict and war.
A. Outreach Strategies

3208 MLK Inc. will create public awareness in several ways:

1. Public Education

We can create public awareness of our dispensary through our community outreach and education programs. By offering free workshops and seminars on topics related to medical cannabis and the conditions for which it is typically recommended, as well as on legal issues surrounding medical cannabis, we make the existence of our organization known and attract members by positioning ourselves in the public mind as ambassadors of a socially responsible provider.

2. Developing Provider Alliances

An important element of our patient-centered approach is the help we will offer patients in finding providers and services to handle other aspects of their care and in coordinating their care across their many different providers. To be able to do this, we must first build alliances with these other providers and organizations. However, alliances are two-way streets and will result in our getting referrals from them as well. A key part of this outreach initiative will be educating alliance partners on the benefits and legalities of medical cannabis, and on the processes involved in referring people for medical cannabis use. Hosting educational forums for other providers will therefore be a critical element in our business approach. Building strong alliances with other health care providers, community health clinics, hospices, community service organization, patient advocacy groups, support groups, AIDS organizations, senior homes, and referral networks will create a strong and lasting source of patient referrals. At the same time, it will give us greater resources to fulfill our own patient-centered mission, which includes helping patients find appropriate providers for services we do not offer and helping them coordinate their care across providers. Being known in the patient community as a wellness center with especially strong networking and referral resources will itself be a draw to patients with complex medical conditions.

3. Industry Leadership and Sponsorships

We will keep our corporate “brand” visible through sponsorships of community and industry causes and through industry activism that reflects our community-focused public health agenda and its emphasis on compassion and social justice.

4. Public Relations

Carefully managed messaging and coverage in local media can be a very effective means to create public awareness.
5. *Word of Mouth*

In the medical cannabis industry, satisfied members and their word of mouth is perhaps the most powerful generator of a growing membership. Many dispensaries report that "friend" is the most common answer reported on new patient intake forms when patients are asked to indicate how they heard about a dispensary. We do not intend to enlist patients to recruit new members or to offer any special incentives to do this. We will not need to. The high quality of supportive patient-centered care we offer as part of our basic mission will be incentive enough. We intend to operate as a "community center" for those suffering from serious medical conditions—what the literature on patient-centered care sometimes refers to as a "medical home-away-from-home" where patients can interact supportively with one another. Since non-members legally cannot be allowed in our facility, patients who appreciate this aspect of our services will naturally recommend membership to those of their friends who are also qualified medical cannabis patients.

Community and Economic Development

City government has shown great interest in revitalization and community development plans that correct systemic inequities and benefit blighted areas and disadvantaged populations. This brings us to a crucial component of our implementation strategy, which is an aggressive outreach and community benefits program. All transactions and money collected in excess of operating and recapitalization costs will be dedicated to funding this larger charitable mission, which has three components:

- Giving indigent and low-income patients full access to our products and wellness/support services,
- Removing other barriers to access through enabling services (providing transportation, interpreters, and referral to other access-enabling services), and
- A Community Benefits Plan.

1. *Commitment to Local Hiring and Spending*

We are committed to making our project a source of economic stimulus for Lansing. From initial build-out of the facility to the implementation of our community development initiatives, we intend to contract, buy, and hire locally, taking advantage of local recruitment resources to offer employment to displaced local workers who are willing to be retrained.

We estimate net direct spending for initial build-out and set-up will exceed $700,000.00 with the majority of these expenditures being spent on goods and services provided by local companies.

We believe that Phase I day-to-day operations will add approximately 20 qualified full-time employment opportunities to City’s economy. The dispensary will
contribute directly to the revitalization of its immediate neighborhood by funneling an influx of visitors from in and around the vicinity of the dispensary, bringng incidental business to shops, restaurants, and other services in the area.

2. Community Benefits Plan

We believe that we can and should have a critical role in the delivery of medical marijuana healthcare. We also believe that we have an important fiduciary obligation to be a “good neighbor” and provide benefits to our community as part of our healthcare mission. Therefore, we view our Community Benefits Plan as a blueprint for how we plan to accomplish our Mission.

In developing our Community Benefits Plan, we will ensure regular involvement of the community, including that of the representatives of the targeted underserved populations, in the planning and implementation of the Community Benefits Plan.

3. Good Neighbor

3208 MLK Inc. seeks to be an asset and a beneficial resource for the surrounding community. As a good neighbor, we will seek neighborhood and other necessary input through every phase of our operation, beginning with the build out and construction phase. We will evaluate and abate any potential public safety/nuisance violations.

We also believe that being a good neighbor requires that we work to improve the neighborhood. Some of the public improvements we plan to address are:

- Access Improvements
- Drainage Improvements
- Landscape Improvements
- Sewer Improvements
- Sidewalk Improvements
- Traffic Engineering improvements
- Lighting Improvements
- Code Compliance

Finally, we will take all efforts to mitigate noise, odor, and pollution/waste, and will address nuisances, including limiting foot and car traffic. (See Item 27 for additional measures being implemented on land use and the effects on traffic patterns).

B. Neighborhood Engagement and Communication-Community Support

1. Community Engagement and Communication Plan:
a. The Applicant will provide information to each recognized neighborhood entity within a ½ mile radius from the Facility location. To ensure that access to the Community Engagement Coordinator ("CEC") is reliable and well defined, the Applicant will distribute the contact information to the designated officer/neighbor within each organization. Information for the CEC shall include cell phone number, email, Facebook, and Twitter accounts.

b. The CEC will produce a monthly newsletter announcing community events, re-messaging of important city announcements, industry news, and company sponsored functions. Distribution of the newsletter will be by electronic transmission to all interested residents and neighborhood organizations that are subscribers. Subscription will be at no cost. A request to have a recipient removed from the list will be honored in a timely manner. The newsletter will also be available on the company’s website.

c. The CEC shall be responsible for the community news content on the company’s website. The format of the website shall comply with standards to assist the visually impaired in accessing content.

d. The CEC will coordinate with the designated officials within City, County and State government to ensure that useful information is disseminated accordingly.

e. The CEC will not promote the business activity or product of the company, commercial messages shall be prohibited with respect to the work activities of the CEC, as defined.

f. Additionally, the CEC will be required to attend organized neighborhood meetings that occur within the outreach area. Meeting schedules are determined by the respective neighborhood bodies conducting the meeting. Attendance by the CEC shall be mandatory.

g. The employee, manager, or owner of the company designated as the CEC may engage in other work activities of the company, however, their responsibilities and duties as CEC shall be defined and limited only to community engagement and communications.

h. Company literature, in print and electronic format, shall include the name and contact information of the CEC. The company website will prominently display this information on its home page.

i. A page on the company website, titled "Community Engagement and Communication Plan", will outline the method that the company applies to
communicate with the interested public; provide a detailed account of meetings attended; and, information shared at neighborhood engagements.

2. Statement of Support for Lansing Neighborhoods and Community Needs:

a. The Applicant, through its business activities, shall have a charitable purpose to support various community needs, to include, but not limited to, human services, homelessness shelter services, food distribution, recreation programming and infrastructure, cultural events, and educational initiatives within the K-12 environment with the cooperation of the Lansing School District.

b. Primary focus of the Applicant is to support needs within the target area of the company location, however, the company will expand its reach based on need and collaboration with its community partners.

c. Amongst our family of companies, we will appropriate a minimum of $100,000 on an annual basis to support neighborhood and community needs. This does not include the value of volunteer work conducted by team members of the company.

d. A volunteer ethos shall be a part of the corporate culture of the company. Team member participation in the plethora of events and activities that occur will be listed in both the “Support of Lansing Neighborhoods and Community Needs” and “Community Engagement and Communication Plan” sections of the website.

e. The company shall list the value of volunteer work on its website. Valuation of volunteer work shall conform to the “Economic Impact of Volunteers Calculator” located at www.pointsoflight.org.

3. Office of Government Relations:

a. The Applicant recognizes the importance of maintaining a robust channel of communication with government officials and agencies, at all levels, having jurisdiction over the Applicant’s medical marihuana business activities.

b. The company shall identify a team member to serve in the capacity of “Government Affairs Associate” (“GAA”). The GAA will inform the Office of the Mayor, City Clerk, Ingham County – Chairperson, and the designated person(s) at Licensing and Regulatory Affairs (LARA), of non-material and material changes occurring, or contemplated, at the company. All notifications shall comply with stipulated rules governing notice requirements.

c. The GAA will represent the company at meetings held by Lansing City Council, Ingham County and the State of Michigan, specifically LARA.
d. The GAA shall communicate all interactions with the various government entities with the company’s management, ownership, and legal team.

15. **Charitable Plans and Strategies:**

Community involvement is very important to 3208 MLK Inc. We have already financially contributed to the Lansing Parks & Recreation Department, the South Lansing Community Development Association and the South Side Community Coalition and will continue to do so in the future. In addition, we will be performing volunteer work with the various community outreach programs.

Amongst our family of companies, we will appropriate a minimum of $100,000 on an annual basis to support neighborhood and community needs. This does not include the value of volunteer work conducted by team members of the company.

We are proud of our military community and the services they provide. We are here to serve our active and veterans and give back to those who promised their lives for ours.

One of our long-term goals within the FMJRL family of companies is to establish a non-profit enterprise that will ultimately lead to a cure for cancer in our lifetimes.

16. **Minimum Operation Standards**

(a) Our Provisioning Center will be located in a building, as defined under Lansing Ordinance Section 1300.9.

(b) We will not be open between the hours of 10 p.m. and 9 a.m.;

(c) Consumption of marihuana on the premises will be strictly prohibited;

(d) We will continuously monitor our entire premises with a surveillance systems that include security cameras and video recordings will be maintained in a secure, off-site location for at least 14 days;

(e) We will install a permanent barrier between public or common areas of our medical marihuana provisioning center and our restricted or non-public areas. We will not store, display or transfer medical marihuana in an area accessible to the general public;

(f) Our medical marihuana storage areas within our medical marihuana provisioning center will be separated from any customer/patient areas by a permanent barrier. We will not display Medical marihuana in a sales area only if permitted by the MMFLA;

(g) Any usable medical marihuana remaining on premises of our medical marihuana provisioning center while our medical marihuana provisioning center is not in operation will be secured in a safe permanently affixed to the premises;
(h) We will not operate our Medical Marihuana provisioning center in a manner creating noise, dust, vibration, glare, fumes, or odors detectable to normal senses beyond the boundaries of the property. Further we will not create any nuisance that hinders the public health, safety and welfare of the residents of the City of Lansing.

(i) Our license shall be prominently displayed on the premises of a medical marihuana provisioning center;

(j) We will dispose of medical marihuana in a manner that prevents its acquisition by any person who may not lawfully possess it and otherwise in conformance with state law;

(k) All medical marihuana will be delivered to a patient will be properly packaged and labeled. Our label will include:

   (1) A unique alphanumeric identifier for the person to whom it is being delivered;

   (2) A unique alphanumeric identifier for the cultivation source of the marihuana;

   (3) That the package contains marihuana;

   (4) The date of delivery, weight, type of marihuana and dollar amount or other consideration being exchanged in the transaction;

   (5) A certification that all marihuana in any form contained in the package was cultivated, manufactured, and packaged in the state of Michigan;

   (6) The warning that; “this product is manufactured without any regulatory oversight for health, safety or efficacy. There may be health risks associated with the ingestion or use of this product. Using this product may cause drowsiness. Do not drive or operate heavy machinery while using this product. Keep this product out of reach of children. This product may not be used in any way that does not comply with state law or by person who does not possess a valid medical marihuana patient registry card.”

   (7) The name, address, email address, and telephone number of an authorized representative of the dispensary whom a patient can contact with any questions regarding the product.

(l) We will require all registered patients to present both their Michigan medical marihuana patient/caregiver id card and state identification prior to entering restricted/limited areas or non-public areas of the medical marihuana provisioning center, and if no restricted/limited area is required, then promptly upon entering the medical marihuana provisioning center.

(m) Our premises shall be open for inspection during the stated hours of operation and as such other times as anyone is present on the premises.

(n) We will not display any signs that are inconsistent with local laws or regulations or state
(o) We will not advertise material that is misleading, deceptive, or false, or that is designed to appeal to minors.

(p) We will not place or maintain an advertisement of medical marihuana within the distance limitations set forth in Lansing Ordinance Section 1300.13(a).

(q) Certified laboratory testing results that display at a minimum the tetrahydrocannabinol (THC), cannabidiol (CBD), total cannabinoid testing results, and a pass/fail rating based on the certified laboratory’s state-required testing will be available to all medical marihuana provisioning center patients/customers upon request and prominently displayed.
Budget Breakdown- Proposed Master Plan for Medical Marijuana Park
Development & Provisioning Centers

3208 South Martin Luther King Blvd. Provisioning Building (20 Jobs)

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
<td>$200,000</td>
</tr>
<tr>
<td>Construction Improvements</td>
<td>$700,000</td>
</tr>
<tr>
<td><strong>Total Cost for 3208 Investment</strong></td>
<td>$900,000</td>
</tr>
</tbody>
</table>

1520 E. Cavanaugh Development

Processing & Grow Building (phase 1) (50 New Jobs) *currently under construction*

<table>
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<th>Item</th>
<th>Cost</th>
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<tbody>
<tr>
<td>Purchase of 1520 Cavanaugh</td>
<td>$1,500,000</td>
</tr>
<tr>
<td>Construction Improvements Grow &amp; Processing</td>
<td>$3,000,000</td>
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<tr>
<td>Total Cost of Current Investment</td>
<td>$4,500,000</td>
</tr>
</tbody>
</table>
  - 1,500 plant count
  - Processing License

Grow & Processing Building 60,000 sq. ft. (90 New Jobs)

<table>
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<tr>
<th>Item</th>
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<tbody>
<tr>
<td>Exterior Construction Cost @ $70 per sq. ft.</td>
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<tr>
<td>Interior Improvements Grow &amp; Processing</td>
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<tr>
<td>Total Cost of Improvements</td>
<td>$10,200,000</td>
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</table>
  - Add 2 (1,500) plant count

Processing Building 14,400 sq. ft. (20 New Jobs)

<table>
<thead>
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<th>Item</th>
<th>Cost</th>
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<tbody>
<tr>
<td>Exterior Construction Cost @ $150 per sq. ft.</td>
<td>$2,160,000</td>
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<tr>
<td>Interior Improvements- Equipment</td>
<td>$2,000,000</td>
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<tr>
<td>Total Cost of Processing Building</td>
<td>$4,160,000</td>
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</tbody>
</table>

Testing Facility Building 11,800 sq. ft. (15 New Jobs)

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Cost @ $200 per sq. ft.</td>
<td>$2,360,000</td>
</tr>
</tbody>
</table>

Research & Development Building 18,000 sq. ft. (10 New Jobs)

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
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</thead>
<tbody>
<tr>
<td>Construction Cost @ $200 per sq. ft.</td>
<td>$3,600,000</td>
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</tbody>
</table>

Secure Transportation Service Building 20,500 sq. ft. (15 New Jobs)

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
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</thead>
<tbody>
<tr>
<td>Construction Cost @ $150 per sq. ft.</td>
<td>$3,075,000</td>
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<tr>
<td><strong>Total Current &amp; Planned Future Construction</strong></td>
<td>$27,895,000</td>
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</table>

2117 South Cedar Street Provisioning Building (20 Jobs)

<table>
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<tr>
<th>Item</th>
<th>Cost</th>
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<tbody>
<tr>
<td>Purchase of Property</td>
<td>$300,000</td>
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<tr>
<td>Construction Improvements</td>
<td>$700,000</td>
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<tr>
<td><strong>Total Cost for 2117 Investment</strong></td>
<td>$1,000,000</td>
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</table>

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
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</thead>
<tbody>
<tr>
<td>Total Capital Investment</td>
<td>$29,795,000</td>
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<tr>
<td>(240 New Jobs to Lansing)</td>
<td></td>
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</tbody>
</table>
NORTHERN MICHIGAN UNIVERSITY
AFFILIATION AGREEMENT
INDIVIDUAL STUDENT-ARRANGED UNPAID WORK EXPERIENCE

This agreement is entered into this 23rd day of October, 2017 by and between the below
agency or business, referred to as AGENCY and Northern Michigan University, Department of
________________________, referred to as NMU and shall continue thereafter until (date) unless
terminated by either party upon 90 days written notice to the other party.

AGENCY (or Business)
Name: Central State Management Inc.
Address: 32411 Mound Rd
Warren, MI 48092

NMU offers curricula, which permit enrolled students to receive work experience as part of their
professional preparation. NMU wishes to enter into an arrangement with the AGENCY where the student
may receive this experience and the AGENCY has an interest in, and resources for, providing this
experience.

Any and all notices given under this agreement shall be directed to:
AGENCY contact: Christopher Arillo, attorney
32411 Mound Rd
Warren, MI 48092 (586) 303-7211

NMU contact:

GENERAL TERMS AND CONDITIONS
1. Students should be considered students and not employees of either party and thus not covered by
AGENCY or NMU for purposes of compensation, fringe benefits, workers’ compensation,
unemployment compensation, minimum wage laws, income tax withholding, social security or any
other purpose, because of their participation in an internship/work experience.

2. For each student placed with Agency there will be a LEARNING AGREEMENT that describes the
expected learning outcomes for that student, including the tasks that the student is expected to be
given, what the student is expected to learn, dates and times of the position, criteria for assessment,
training provided, intended supervision, reports and the documentation needed for grading and any other related information.

3. Each student is placed with AGENCY to receive experience as a part of his or her academic curriculum; those duties performed by the student are not performed as an employee, but in fulfillment of the LEARNING AGREEMENT and are performed under supervision. At no time shall a student replace or substitute for any employee of AGENCY. This provision shall not be deemed to prohibit the employment of a student by either party under a separate employment agreement. NMU shall notify each student of the contents of this paragraph.

4. Each party agrees to comply with and be separately responsible for compliance with all applicable laws, including anti-discrimination and employment laws.

5. In the performance of their respective duties and obligations under this agreement, each party is an independent contractor, and neither is the agent, employee or servant of the other, and each is responsible only for its own conduct.

6. Each party agrees that statutory and common law theories and principles of indemnification, contribution and equitable restitution shall govern and apply to claims, costs, actions, causes of action losses or expenses including attorney fees, resulting from or caused by its actions, the actions of its employees and of students, pursuant to this Agreement.

7. Both parties agree to maintain Commercial General Liability Insurance and Professional Liability Insurance, which covers employees and students whenever the liability might exist. A Certificate of Insurance will be furnished to the other party, on request, indicating effective coverage and liability limits.

8. This agreement is intended solely for the mutual benefit of the parties, and there shall be no monetary consideration paid by either party to the other.

RESPONSIBILITIES OF NMU:
1. Provide students in good academic standing and with appropriate preparation in the degree of study for the intended field experience.

2. Assign a faculty member to serve as a contact that will coordinate student learning activities between NMU and AGENCY, make periodic contacts, as feasible and necessary, with AGENCY and students.

3. Plan and administer, in consultation with the representatives of the AGENCY, a LEARNING AGREEMENT for each student.

4. Maintain all education records and reports relating to the educational program of each student and to comply with all applicable statutes, rules and regulations respecting the maintenance of and release of information from such records. The AGENCY shall have no responsibility regarding such records and shall refer all requests regarding such information to the UNIVERSITY.

5. Instruct each student with regard to general regulations and procedures which the parties have agreed are necessary, including, by way of example: Confidentiality of Agency records and information; Authority of Agency staff over patient, client or customer services; Uniform standards; Health Requirements; Importance of carrying their own health insurance.

RESPONSIBILITIES OF AGENCY:

1. Plan and administer all aspects of services provided at its facilities.
2. Provide qualified supervision of the student(s) during the work experience. AGENCY supervisory employees may relieve a student from a particular assignment or require that a student leave an area or department pending a final determination of the student’s future status by the parties. AGENCY must notify NMU of its decision to remove a student from any experience prior to the agreed upon time and provide a written report to the NMU noting the reasons entailed in the removal.

3. Provide pertinent policies and procedures to students prior to student beginning the work experience.

4. Cooperate with the NMU in the planning and conduct of the student’s work experience to ensure that it will fulfill the accepted LEARNING AGREEMENT.

5. Provide relevant education/training opportunities to student in fulfillment of the LEARNING AGREEMENT.

6. Provide requested verification of student’s academic reports for time on task.

7. Complete an end of work experience evaluation of the student’s performance.

8. Provide a safe working/learning environment including the necessary office space and other required facilities, equipment and supplies, and travel.

AGREED TO:

AGENCY

By: [Signature]

Northern Michigan University

By: ____________________________

Name & Title

Date: Oct 26 2017

AGENCY

By: [Signature]

Northern Michigan University

By: ____________________________

Name & Title

Date: ____________________________

Procedure

1. Use this form only to create an agreement with an Agency for unpaid work experiences that will be individually student-arranged. The Director does not formally negotiate the placement, but may aid a student in the process. The Agency might regularly use student interns or it may happen very infrequently. One agreement covers all instances of actual work experiences and continues until explicitly terminated by either party.

2. Verify whether an Affiliation Agreement is on file with Academic Affairs for this Agency. There may be an Agreement with a higher level division within an organization, e.g. DNR rather than Parks and Recreation. Agreements are not needed when the work experience is within NMU.

3. If not:
   a. Complete Affiliation Agreement for unpaid work experiences
   b. Obtain required signatures.
   c. Distribute copies to all signees, departmental Director and Academic Affairs.
BART NOW PLLC
CHRISTOPHER AIELLO
IOLTA ACCOUNT
32411 MOUND RD
WARREN, MI 48092

PAY TO THE ORDER OF South Side Community Coalition $ 200.00

Flagstar Bank

FOR 2117 Cedar LLC Donation

Chris Aiello

BART NOW PLLC
CHRISTOPHER AIELLO
IOLTA ACCOUNT
32411 MOUND RD
WARREN, MI 48092

PAY TO THE ORDER OF South Lansing Community Development Association $ 200.00

Flagstar Bank

FOR 2117 Cedar St Inc. Donation

Chris Aiello

BART NOW PLLC
CHRISTOPHER AIELLO
IOLTA ACCOUNT
32411 MOUND RD
WARREN, MI 48092

PAY TO THE ORDER OF Lansing Parks and Recreation Department $ 200.00

Flagstar Bank

FOR 2117 Cedar LLC Donation

Chris Aiello
South Side Community Coalition
2101 W Holmes
Lansing, Michigan 48910

RE: Charitable Donation by 3208 MLK Inc.

Dear South Side Community Coalition:

We are new to your neighborhood. The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 3208 South Martin Luther King Jr. Blvd., Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

Frank Mastroianni, Director
3208 MLK, Inc.

adg/FM
Encl.
2117 CEDAR, INC.
A SUBSIDIARY OF FMJRL, INC. A MICHIGAN CORPORATION
Mailing Address: 32411 Mound Road
Warren, Michigan 48092
Tel. (586) 303-2211 / Fax. (586) 303-1259

Lansing Parks and Recreation Department
200 North Foster Avenue
Lansing, Michigan 48912

RE: Charitable Donation by 2117 Cedar Inc.

Dear Lansing Parks and Recreation Department

We are new to your neighborhood. The mission statement of 2117 Cedar Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 2117 South Cedar Street, Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

Frank Mastroianni, Director
2117 Cedar, Inc.

adg/FM
Encl.
South Lansing Community Development Association
800 West Barnes Avenue
Lansing, Michigan 48910

RE: Charitable Donation by 3208 MLK Inc.

Dear South Lansing Community Development Association:

We are new to your neighborhood. The mission statement of 3208 MLK Inc. is to establish a first-class medical marijuana dispensary to retail medical marijuana to its patients at our location of 3208 South Martin Luther King Jr. Blvd., Lansing, Michigan 48910. We are committed to strong public engagement and outreach to the community. Community involvement is very important to us. Please accept this donation on our behalf and continue to provide your services to the community. Once operational, we will be contacting you to collaborate on community projects that can benefit our community.

Yours truly,

Frank Mastroianni, Director
3208 MLK, Inc.

adg/FM
Encl.
PATIENT HANDBOOK
PATIENT WELCOME

Welcome to 3208 MLK, Incorporated. Our goal is to provide you with a holistic approach to your wellness. In this Patient Handbook, we have included information about your visit, our guidelines, the medical marijuana law, and how to use medical marijuana. Please feel free to ask any staff member for clarification on handbook.

A. Patient Guidelines to Stay Safe and Health
   • Be a courteous and respectful neighbor
   • You must be at least 18 years old with a valid registry identification card to enter
   • Your identification must be ready at the door when you check in
   • Do not use or consume marijuana in transportation or public place
   • No cell phone calls or cameras are allowed in the building
   • You may not sell or distribute your marijuana medication
   • Place your medicine out of sight in a safe place before leaving the facility
   • Respect staff, other patients/caregivers, and neighbors
   • Report suspicious behavior to us

FAILURE TO COMPLY WITH THESE GUIDELINES WILL RESULT IN TERMINATION OF SERVICE

B. Patients' Rights
   • You have the right to be treated with respect and professionalism.
   • You have the right to accurate and easily understood information about the laws and local regulations.
   • You have the right to have your medicine provided elsewhere if needed.
   • You have the right to accurately labeled and weighed quality medication and accurate information about the medication being provided.
   • You have the right to obtain your medication in a safe and friendly environment.
   • You have the right to safe and effective medicine handled in appropriate and sanitary conditions.
   • You have the right to considerate, respectful, and non-discriminatory care.
   • You have the right to know if your referring physician has a personal or professional relationship with us.
MEDICAL MARIJUANA LAW OVERVIEW

In November 2008, the Michigan Medical Marijuana Initiative was approved by 62.7% of voters, making Michigan the thirteenth state to legalize medical marijuana. On the ballot as Proposal 1, the Michigan Medical Marijuana Initiative decriminalized the cultivation and use of medical marijuana by seriously ill individuals who have obtained a doctor’s approval. It allows patients to grow up to 12 marijuana plants and possess up to 2.5 ounces of usable marijuana. Qualified caregivers can grow up to 12 marijuana plants for each patient, with a maximum of five patients per caregiver.

The Michigan Medical Marihuana Act is administered by the Michigan Medical Marihuana Program, which issues Michigan Medical Marihuana Program Registry Identification Cards. It is mandatory for medical marijuana patients and primary caregivers to maintain a valid state registry ID card to receive any protections afforded by the Michigan Medical Marihuana Act. A patient or caregiver who possesses a valid state registry ID card is presumed to be in possession of marijuana for medical purposes if the amount does not exceed the limits allowed by state law.

A. What the Law Does

Protects Patients and Caregivers

The Act says that anyone who follows the requirements can't be penalized for the medical use of marijuana. The Act prohibits certain discriminatory practices, including:

- A school or landlord can't refuse to enroll or lease to a qualifying patient unless failing to do so would cause the school or landlord to lose benefits under federal law;
- An employer can't discriminate against a qualifying patient in hiring, terminating, or imposing employment conditions unless failing to do so would cause the employer to lose benefits under federal law; and
- An employer can't penalize a qualifying patient for a positive drug test for marijuana, unless the patient used, possessed, or was impaired by marijuana on the employment premises or during hours of employment.

Protects Physicians

The Act states that, if a physician complies with the procedures specified in the Act, she or he shall not be subject to arrest, prosecution or penalty in any manner or denied any right or privilege, including but not limited to civil penalty or disciplinary action by the Arizona board of medical examiners or by any other business, occupational or professional licensing board or bureau, based solely on providing written certifications or for otherwise stating that, in the physician’s professional opinion, a patient is likely to receive therapeutic or palliative benefit from the medical use of marijuana to treat or alleviate the patient’s debilitating medical condition or symptoms associated with the debilitating medical condition, but nothing in this chapter prevents a professional
licensing board from sanctioning a physician for failing to properly evaluate a patient's medical condition or otherwise violating the standard of care for evaluating medical conditions.

**Limits Qualifying Medical Conditions**

In order to use marijuana as medicine, a qualifying patient must be diagnosed with one or more of the following “debilitating” medical conditions:

- Cancer
- Glaucoma
- Human Immunodeficiency Virus (HIV)
- Acquired Immune Deficiency Syndrome (AIDS)
- Hepatitis C
- Amyotrophic Lateral Sclerosis (ALS)
- Crohn's disease
- Agitation of Alzheimer's disease
- A chronic or debilitating disease or medical condition or the treatment for a chronic or debilitating disease or medical condition that causes:
  - i. Cachexia or wasting syndrome;
  - ii. Severe and chronic pain;
  - iii. Severe nausea;
  - iv. Seizures, including those characteristic of epilepsy; and
  - v. Severe or persistent muscle spasms, including those characteristic of multiple sclerosis

**B. What Medical Marijuana Law Does NOT Do**

- Authorize smoking marijuana on public transportation or in a public place.
- Authorize a person to smoke medical marijuana in a parked car while outside a private business that is open to the public.
- Authorize a person to smoke medical marijuana on the front porch of your home.
- Authorize smoking medical marijuana in a public campground – even when no one is around.
- Authorize operating, navigating, or being in actual physical control of a motor vehicle, aircraft, or motorboat while under the influence of marijuana. A registered qualifying patient will not be considered to be under the influence of marijuana solely because of the presence of marijuana in the person’s system that appears in a concentration insufficient to cause impairment.
GUIDE TO USING MARIJUANA

The federal government classifies cannabis as a schedule 1 drug; a classification that implies that cannabis has no legitimate medical use. This classification should be changed because cannabis is recommended by a multitude of physicians for the treatment of many medical conditions. Furthermore, THC (the primary active compound in cannabis) is FDA approved and is called dronabinol. Dronabinol is marketed using the trade name Marinol.

There are many methods of using cannabis for the treatment of medical conditions. The following information is intended to inform medical cannabis patients about the various options available to them.

Please note: We are aware the Department may not allow all of these methods of ingestion, the following is for educational purposes only.

A. Smoking
Smoking marijuana produces the most immediate effects and permits the most refined control of your dosage. Smoking any material is not good for the lungs, but the amount of marijuana you need to smoke is so small that you need not be overly concerned. It is better to smoke the flowers rather than the leaves as this also reduces the amount you will need to smoke.

1. Popularity of Smoking
   • Rapid onset: Smoking delivers active compounds quickly into the bloodstream and to receptor sites via the lungs.
   • Simplicity: Compared to other dosage methods, smoking cannabis is simple, requiring very little preparation time. Before smoking cannabis, the patient must simply separate the buds into individual flowers and remove any stems. Doing so ensures an even burn and less need for flame application (less unwanted fumes=better-tasting, more healthful smoke). To make this easy, use a handheld herb grinder or a pair of scissors and a shot glass.
   • Easy dosage determination: smoked cannabis is effective almost immediately, allowing the user to titrate the dose one puff at a time. This allows the user to get just the right dose by gradually increasing the dose until effective.

2. Methods of smoking
   a. Joint:
      (a.k.a. “marijuana cigarette” or “reefer”) Convenience of joints is key, as joints burn for multiple puffs worth of cannabis after only being lit once and are easily transportable. Joints also taste pleasant to most patients, and they don’t require breakable, expensive, or conspicuous equipment. A huge plus is efficient delivery of cannabinoids. This is perhaps due to a joint’s lack of a filter or long piping before the mouth, to which sticky cannabinoids adhere easily, reducing the amount of medicine
that actually reaches the patient’s body. It is a skill to roll a good joint, however, novices uninterested in learning how to do so should buy a joint-rolling machine or pre-rolled joints. Before rolling a joint, the patient should break the bud(s) into small, uniform pieces about the size of the individual bud flowers or slightly smaller. Stems should be removed from the flowers to avoid foul, acrid smoke and possible holes poked in the rolling paper. To roll a joint, practice, practice, practice or ask an expert at our facility for help. Some joint smokers prefer unbleached rolling papers, hemp rolling papers, or clear, cellulose-based papers, which may taste better and contain fewer impurities than traditional, bleached-white rolling papers. **Patients should note that, while still remarkably safe, joints are one of the least-healthy methods of dosage because they burn paper and glue along with cannabis, exposing users to impurities not presented by some other alternative dosage methods. Another downside is waste: Some smoke is inevitably lost between inhalations, and there is usually leftover cannabis in the “roach”, or the small, undesirable leftover part of a burned joint. However, joints’ efficient delivery of cannabinoids—relative to other smoking methods—may compensate for such waste.

b. Dry “Hand” Pipes

Hand Pipes: These come in a (possibly overwhelming) variety of shapes, sizes, and materials, but the basic mechanics are universal. To smoke a cannabis pipe: pack prepared buds into the bowl; and hold a flame directly over the medicine while simultaneously inhaling through the mouthpiece.

c. Water Pipes

Mechanically, these are nearly identical to hand pipes, but use a chamber of water to filter and cool the smoke before it is inhaled. There are two main types: bongs and bubblers, classified by either a large or a small filling chamber, respectively, in which the smoke collects. The main proven advantage over dry pipes or joints is comfort; smoke is cooled and free of hot ashes and particles. *Beware: large “hits” of smoke will cause light-headedness and an inclination to blacking out, and water pipes make accidentally taking a bigger-than-expected hit a possibility. Water pipes are supposed by many smokers to be a safer alternative to dry pipes or joints because the water filters tar out of the smoke. Unfortunately, as one test points out, water filtration removes THC and other desirable active compounds more so than tar. This means “in order to obtain the same effective dose of THC, a smoker would end up taking in at least 30% more tar from a water pipe than from an unfiltered joint”. However, water filtration may remove water-soluble toxic gases such as carbon monoxide, which is linked to heart disease, and aldehydes, which promote cancer [3], so more research is required to determine whether water pipes are beneficial or counterproductive.

**A problem with all pipe smoking is that you must suck on one side of the pipe, pulling air and, along with the flame—lighter fluid fumes—over the cannabis, through the pipe, and into your lungs to light the cannabis on fire. Grind your bud to minimize the need for a starting flame. To avoid lighter fluid fumes, some patients
light their pipe with an organic, beeswax-covered hemp wick, or a magnifying glass under bright sunlight.

First time smoking? Use discretion. Cannabis is highly potent! Don't be alarmed though; this is good news for the patient because it allows him or her to burn less plant material to get an effective dose than with lower-potency cannabis [3,2]. This also means that, if the patient is new to smoking, it may only take one substantial inhalation to get an effective dose. Start with a small hit. Inhale deeply, exhale immediately (it is a myth that holding in the smoke will be more effective), and WAIT for several minutes to feel the effects of the hit before taking the next so as to minimize the dose.

In summary, if a patient wants the quickest relief possible (easy preparation, plus onset in seconds, and understands and accepts the possible risks inherent to smoking his or her medicine, a pipe is the utensil of choice.

Our growing process and drying process are designed to prevent problems associated with fungi that would affect the safety of our medicine. Buds will be inspected upon trimming and after drying for the presence of mold, and samples are sent to a laboratory for testing.

B. Vaporizing

Cannabis vaporizers are designed to let users inhale active cannabinoids while avoiding harmful smoke toxins. They do so by heating cannabis to a temperature that is just below the point of combustion where smoke is produced. At this point, THC and other medically active cannabinoids are emitted with little or none of the carcinogenic tars and noxious gases found in smoke. Many medical marijuana patients who find smoked marijuana highly irritating report effective relief inhaling through vaporizers. Also, vaporizers are very efficient so they can save money in the long term.

C. Eating

Marijuana can be eaten. When consumed this way, it is usually baked in brownies or cookies, and sometimes made into a candy. It takes longer to feel the effects when eaten, and may take longer for you to learn to control your dosage. However, when you do feel the effects, they may be stronger than those felt by smoking. You may also feel certain heaviness in your body. This will not hurt you. Schedule your time so that you can relax when you take it.

D. Tea

Like other herbs, marijuana may be made into a tea. Boil the water first and pour it over the marijuana. Let it steep for longer than you would for common black tea; approximately an hour and a half. Add 1 teaspoon of butter. The effects are similar to eating it.
E. Tincture

To prepare a tincture, use 5 parts fresh marijuana to 1 part vodka. If you are using dried marijuana, as is usually the case, use 10 parts marijuana to 1 part vodka. An easy way to do this if you don’t have measuring equipment, is to fill whatever container you are using (glass is preferable as you don’t want to leech any residues from metal containers) to thirds full with marijuana, then fill the container with vodka and let stand for a week or more. Afterward, strain the solution. If you use a larger portion of marijuana, the resulting tincture will be more potent.

F. Compress

Follow the recipe as for tea. Make as much as you need to thoroughly soak the cloth you intend to use. Apply to pain and leave on ½ hour.

G. Marinol

Marinol is a synthetic petrochemical analog of THC, one of the active elements found in marijuana. Some patients find that it helps relieve nausea yet takes a long time to work. Do not smoke this product. It has the potential for overdose. Use only under the supervision of a doctor.

DOSAGE, POTENCY AND TOLERANCE

A. Dosage

Smoking cannabis effects can be felt almost instantly. Tinctures are slightly slower to take effect than inhalation methods; they start to take effect in five minutes or less. Eating cannabis infused foods or capsules is the slowest method of medicating with cannabis but it provides longer lasting effects than other methods. The effects of ingested cannabis may take from 30 minutes to longer than an hour to be noticeable, and may maintain peak intensity for one to two hours before gradually diminishing over several hours. The effects imparted by eating cannabis are also pharmacologically different from those produced by other intake methods, because THC is converted to 11-hydroxyl-THC in the liver when cannabis is eaten.

When using any cannabis preparation start with a small quantity, wait the proper amount of time for the effects to take place, and then take more if necessary. Dosage determination is most easily accomplished using inhalation and tincture methods. It is more difficult to determine ingestion dosage than inhalation or tincture dosage, because the onset of effects is much less rapid with ingestion. The amount of food and type of food in the digestive tract also play roles in determining effective ingestion dosage, further complicating the task. Whatever the method of intake, a lethal overdose of cannabis cannot be achieved. Overdosing on cannabis may produce unpleasant feelings such as drowsiness or anxiety, but users experiencing such feelings should stay calm and wait for the effects of cannabis to diminish. Users who fear the possibility of unpleasant feelings from an overdose may wish to avoid cannabis edibles, as eating cannabis is the most likely intake method to cause an overdose.
B. Potency

All of the varieties that we will offer are high, medium and low potent*. This is our policy for several reasons. One reason is high potency will save caretakers money by allowing them to use less medicine. Another reason is highly potent varieties are healthier for those who choose to smoke their medicine, because less plant material must be smoked to get the same dose of active compounds. We will also only offer highly potent varieties, as this will aid in simplifying the caretaker's task of choosing the right varieties for their individual needs. One last reason for this policy is that it will help caretakers determine the appropriate dosage of each variety.

*Each variety we offer is of different potency and has unique medicinal effects.

C. Tolerance

Proper dosage is difficult to gauge; many variables at play Cooking THC makes it slightly more psychoactive can be administered using tinctures, ingestion, smoking, vaporizing, and by other the effect of each method and the rate of onset when using each method varies and vaporization provide the fastest onset of effects of any method of administering

Heavy cannabis use will, over time, result in lowered sensitivity to the drug. However, most patients lose side effects over time, not medicinal efficacy. To avoid gaining tolerance to cannabis, patients should try different varieties of cannabis and different intake methods.

**SIDE EFFECTS OF USING MARIJUANA**

Marijuana is one of the safest medicines; it is impossible to consume enough to produce a toxic effect in the body. However, if you are unfamiliar with it, there are some effects, which you should be aware of so that you can use it more effectively.

A. Uneasiness

Marijuana usually has a soothing and comforting effect on the mind. Sometimes, however, people do experience feelings of anxiety. If this happens to you, there are several things you can do. Try to stay in environments where you feel naturally comfortable. If you feel anxious, sit or lay down, breathe deeply, and relax. If you have loved ones with you, hold each other for a while. If you have a pet, hold or stroke it. Eating will often quickly reduce the feeling of anxiety. Then, the next time you use it, try reducing your dosage. Because of our social training, you may have feelings of guilt. Know that you have a right to your medicine.

B. Hunger & Thirst

Many patients use marijuana to stimulate appetite. If you are not using marijuana for this purpose, drink water or juice. If you wish to eat, eat good nourishing food rather than sweets.
C. Redness in the Eyes

This will not hurt you. If you must go out in public and are concerned about others’ reaction to the redness, wear sunglasses or use eye drops.

D. Drowsiness

If marijuana makes you sleepy, take a nap if you can and wish to. As with all medicines that can produce drowsiness, don’t drive or operate heavy machinery.

E. Sleeplessness

If you find that you can’t sleep for a while after using marijuana, try reducing your dosage and avoid using it for about two hours or so before you want to sleep.

F. Short-term Memory Loss

Sometimes people find it difficult to carry on a complicated conversation, keep track of details, or perform complex tasks. If this happens to you, schedule your time so that you don’t have to do these things when using your medicine.

G. Giddiness

Many people find that things, which normally don’t seem funny become quite amusing when they use marijuana. Most people enjoy this effect. If you must deal with situations where humor would be inappropriate in your judgment, schedule your time so that you don’t have to deal with them when you are taking your medicine.¹

SATIVA VS. INDICA

The efficacy of cannabis is directly related to strain selection, therefore we recommend care be taken in selecting appropriate strains to meet your needs. We are beginning to identify particular varieties that are effective for sleep, pain, appetite, and energy; as well as for specific conditions.

Cannabis potency varies with strains. In terms of medicinal dosage, the idea is to smoke as little as possible in order to reduce respiratory irritations from excessive inhalation of burnt plant matter. Patients are highly encouraged to use vaporizers, or ingest cannabis medicine to reduce any potential risks from smoking. Patients need less high potency cannabis to reach desired effects. Any patients who find they need increasingly larger doses to reach desired effects should reduce, or stop intake for a time, or change the variety of cannabis normally used. This helps patients return to a minimized effective dosage level.

Generally, the sativa plant is the taller and lankier variety, reaching heights of over 5-6

¹ Excerpt from Americans for Safe Access
meters. It is characterized by narrow serrated leaves and loose spear-like flower clusters that can be extremely resinous. Primarily, the effects of sativas are on the mind and emotions. In this regard, they tend to be more stimulating, uplifting, energizing, and creativity enhancing. These benefits can be particularly helpful for the psychological component of many illnesses. Sativas are generally better for daytime use.

Indica plants are normally shorter and stockier plants, reaching 1-2 meters in height with wide, deeply serrated leaves and compact and dense flower cluster. The effects of indicas are predominantly physical, although the relief of certain physical symptoms can have emotional results as well. These effects can be characterized as relaxing, sedating, and pain reducing. Indicas are generally best for later in the day and before bed.

Strain crosses, or hybrids, are the result of cross-pollination of various strains. The characteristics, and hence the effects, of one strain will usually be dominant. For example, indica-dominant crosses are good for pain relief, with the sativa component helping with energy, and activity levels. Sativa-dominant crosses are good for stimulating appetite, with the indica component helping to reduce body pain and increase relaxation.²

² Highland Springs Wellness Center
<table>
<thead>
<tr>
<th>Sativa</th>
<th>Indica</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduces depression</td>
<td>Reduces pain</td>
</tr>
<tr>
<td>Relieves headaches and migraines</td>
<td>Relaxes muscle spasms</td>
</tr>
<tr>
<td>Energizes and stimulates</td>
<td>Stimulates appetite</td>
</tr>
<tr>
<td>Reduces awareness of pain</td>
<td>Reduces inflammation</td>
</tr>
<tr>
<td>Increases focus and creativity</td>
<td>Aids sleep</td>
</tr>
<tr>
<td>Reduces nausea</td>
<td>Relieves headaches and migraines</td>
</tr>
<tr>
<td>Stimulates appetite</td>
<td>Reduces intra-ocular pressure</td>
</tr>
<tr>
<td>Supports immune system</td>
<td>Anti-convulsant</td>
</tr>
</tbody>
</table>

**UNDERSTANDING EDIBLES**

Edibles are foods cooked with butter or oil that has been infused with marijuana (e.g. bars or cookies). Edible marijuana usually takes longer to take effect (20 minutes to an hour or more) and the effects generally last longer than smoking or vaporizing marijuana. All of our edibles are carefully enhanced with a consistent strength. Below we have provided safety tips for the consumption of our edible marijuana products.

- You should pay attention to the packing and labeling to make sure you are consuming the recommended strength, particularly since edibles are made in various strengths.
- If you are new to medical marijuana, you may want to start with a half dose, gradually increasing to recommended strength. You should “start low and go slow.”
- When using edibles, it is important to no cross-medicate or use alcohol or other drugs. The effect may be strengthened, causing an overreaction, including unusual drowsiness or slow reflexes.
- If you ever over-medicate, medical marijuana is non-toxic and not lethal.
- All products should be stored in a safe place, away from children and pets.
- When eating or drinking medical marijuana, it can take up to 1 to 1.5 hours to feel the effects, depending upon your body’s chemistry. You should wait at least an hour before taking more.
Emerging Clinical Applications for Cannabis and Cannabinoids:
A Review of the Recent Scientific Literature
Fourth Edition
THE SAFETY PROFILE OF MEDICAL CANNABIS

Cannabinoids have a remarkable safety record, particularly when compared to other therapeutically active substances. Most significantly, the consumption of marijuana — regardless of quantity or potency — cannot induce a fatal overdose. According to a 1995 review prepared for the World Health Organization, “There are no recorded cases of overdose fatalities attributed to cannabis, and the estimated lethal dose for humans extrapolated from animal studies is so high that it cannot be achieved by… users.”

In 2008, investigators at McGill University Health Centre and McGill University in Montreal and the University of British Columbia in Vancouver reviewed 23 clinical investigations of medical cannabinoid drugs (typically oral THC or liquid cannabis extracts) and eight observational studies conducted between 1966 and 2007. Investigators “did not find a higher incidence rate of serious adverse events associated with medical cannabinoid use” compared to non-using controls over these four decades.

That said, cannabis should not necessarily be viewed as a ‘harmless’ substance. Its active constituents may produce a variety of physiological and euphoric effects. As a result, there may be some populations that are susceptible to increased risks from the use of cannabis, such as adolescents, pregnant or nursing mothers, and patients who have a family history of mental illness.

Patients with hepatitis C, decreased lung function (such as chronic obstructive pulmonary disease), or who have a history of heart disease or stroke may also be at a greater risk of experiencing adverse side effects from marijuana. As with any medication, patients should consult thoroughly with their physician before deciding whether the medical use of cannabis is safe and appropriate.

As states continue to approve legislation enabling the physician-supervised use of medical marijuana, more patients with varying disease types are exploring the use of therapeutic cannabis. Many of these patients and their physicians are now discussing this issue for the first time and are seeking guidance on whether the therapeutic use of cannabis may or may not be advisable. This report seeks to provide this guidance by summarizing the most recently published scientific research (2000-2010) on the therapeutic use of cannabis and cannabinoids for 19 clinical indications:

- Alzheimer’s disease
- Amyotrophic lateral sclerosis
- Chronic pain
- Diabetes mellitus
- Dystonia
- Fibromyalgia
- Gastrointestinal disorders
- Gliomas/other cancers
- Hepatitis C
• Human Immunodeficiency Virus
• Hypertension
• Incontinence
• Methicillin-resistant Staphylococcus aureus (MRSA)
• Multiple sclerosis
• Osteoporosis
• Pruritus
• Rheumatoid arthritis
• Sleep apnea
• Tourette’s syndrome

In some of these cases, modern science is now affirming longtime anecdotal reports of medical cannabis users (e.g., the use of cannabis to alleviate GI disorders). In other cases, this research is highlighting entirely new potential clinical utilities for cannabinoids (e.g., the use of cannabinoids to modify the progression of diabetes).³

## AILMENT SPECIFIC STRAINS

Below is information about the purported effectiveness of various strains of marijuana for certain health effects.¹

<table>
<thead>
<tr>
<th>Strain</th>
<th>Effect</th>
</tr>
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<tbody>
<tr>
<td>Afghanica</td>
<td>Nausea, pain</td>
</tr>
<tr>
<td>Afghanic x Haze</td>
<td>PMS</td>
</tr>
<tr>
<td>AK-47</td>
<td>Pain, nausea, depression, insomnia, headache</td>
</tr>
<tr>
<td>Alien Train Wreck</td>
<td>Asthma</td>
</tr>
<tr>
<td>Apollo 13</td>
<td>Back pain</td>
</tr>
<tr>
<td>Auntie Em</td>
<td>Crohn's Disease, MS</td>
</tr>
<tr>
<td>Aurora B</td>
<td>Nausea, joint pain, arthritis</td>
</tr>
<tr>
<td>Derry-Bolt</td>
<td>Insomnia, joint pain</td>
</tr>
<tr>
<td>Big Bang</td>
<td>Used to sedate and relieve stress &amp; anxiety amongst sufferers of severe anxiety, etc.</td>
</tr>
<tr>
<td>Big Kahuna</td>
<td>Herniated disc pain, arthritis</td>
</tr>
<tr>
<td>Black on Blue Widow</td>
<td>HIV, back pain</td>
</tr>
<tr>
<td>Black Vietnamese</td>
<td>Nausea, muscle spasms, pain</td>
</tr>
<tr>
<td>Blue Fruit</td>
<td>Crohn's Disease, muscle spasms</td>
</tr>
<tr>
<td>Blue Moonshine</td>
<td>Anxiety, depression, insomnia</td>
</tr>
<tr>
<td>Blue Satellite x Jack Herer</td>
<td>Depression, nausea</td>
</tr>
<tr>
<td>Blue Satellite</td>
<td>Pain, nausea, insomnia, anxiety, muscle tension</td>
</tr>
<tr>
<td>Blueberry</td>
<td>Nausea, insomnia, pain</td>
</tr>
<tr>
<td>B9g Sour Bubble</td>
<td>Pain, anxiety</td>
</tr>
<tr>
<td>Bonzo Bud</td>
<td>Body pain, migraine</td>
</tr>
<tr>
<td>B:adacolumbia</td>
<td>Nausea</td>
</tr>
<tr>
<td>Burmaberry</td>
<td>Migraine, depression</td>
</tr>
<tr>
<td>Burmese kush</td>
<td>Anxiety, depression</td>
</tr>
<tr>
<td>C99 x Great White Shark</td>
<td>Anxiety</td>
</tr>
<tr>
<td>Cali-O</td>
<td>Nausea</td>
</tr>
<tr>
<td>Catalyst</td>
<td>PMS</td>
</tr>
<tr>
<td>Cinderella 99</td>
<td>Nausea</td>
</tr>
<tr>
<td>C/T</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Citral</td>
<td>Insomnia</td>
</tr>
<tr>
<td>Cripple Creek</td>
<td>Ankylosing Spondilitis, Hepatitis C, Degenerative Disc Disease, IBS, Interstitial Cystitis, Chronic Rotator Cuff Disease</td>
</tr>
<tr>
<td>Deep Chunk</td>
<td>Joint pain, insomnia</td>
</tr>
<tr>
<td>Dynamite</td>
<td>Asthma, Crohn's Disease, Hepatitis C</td>
</tr>
<tr>
<td>NYC Sour Diesel</td>
<td>Edema, epilepsy, fibromyalgia, radiculopathy</td>
</tr>
<tr>
<td>El Nino</td>
<td>Nausea, insomnia</td>
</tr>
<tr>
<td>Fieldale Haze</td>
<td>Anxiety, back pain</td>
</tr>
<tr>
<td>Fig Widow</td>
<td>Back pain, psychosis</td>
</tr>
<tr>
<td>Firecracker</td>
<td>Anxiety, depression, nausea</td>
</tr>
</tbody>
</table>

¹ Michigan Medical Marijuana Association
<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>G13 x HP</td>
<td>Nausea, joint pain, insomnia</td>
</tr>
<tr>
<td>G-13</td>
<td>Depression, pain, ADD, ADHD</td>
</tr>
<tr>
<td>Grapefruit</td>
<td>Arthritis, Hepatitis C, pain, nausea</td>
</tr>
<tr>
<td>Green Queen</td>
<td>Epilepsy, neck/spine pain</td>
</tr>
<tr>
<td>Green Spirit x Timewarp x Herijuana</td>
<td>RLS, insomnia, migraine, joint pain</td>
</tr>
<tr>
<td>Green Spirit x Herijuana</td>
<td>Nausea, headache, body pain</td>
</tr>
<tr>
<td>Herijuana x Trainwreck</td>
<td>Diabetic neuropathy, joint pain, insomnia, MS</td>
</tr>
<tr>
<td>Herijuana</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Ice Princess x Bublegum</td>
<td>Migraine</td>
</tr>
<tr>
<td>Jack Herer</td>
<td>Anxiety, fibromyalgia</td>
</tr>
<tr>
<td>Juicy Fruit</td>
<td>Insomnia, joint pain, anxiety</td>
</tr>
<tr>
<td>Kall Mist</td>
<td>Nausea, depression</td>
</tr>
<tr>
<td>Kat-X</td>
<td>Body pain</td>
</tr>
<tr>
<td>Killer Queen</td>
<td>Depression, back pain</td>
</tr>
<tr>
<td>Krinkle x Kush x Freezeland</td>
<td>MS muscle spasms</td>
</tr>
<tr>
<td>Leda Uno</td>
<td>Insomnia</td>
</tr>
<tr>
<td>Legends Ultimate Indica x Herijuana</td>
<td>Muscle spasms, pain</td>
</tr>
<tr>
<td>Lemon Chemo</td>
<td>Insomnia, back pain, migraine</td>
</tr>
<tr>
<td>Lemon Haze</td>
<td>RLS, chronic fatigue</td>
</tr>
<tr>
<td>Lifesaver</td>
<td>Nausea, headache, pain, insomnia</td>
</tr>
<tr>
<td>Lollipop</td>
<td>Cachexia, degenerative bone/disc disease, edema, general pain, general pain, general seizures, glaucoma, migraine, MS, nausea, Post-Traumatic Stress Disorder</td>
</tr>
<tr>
<td>Lowryder</td>
<td>Nausea, pain, headache</td>
</tr>
<tr>
<td>LSD</td>
<td>Nausea, anxiety, depression, headache</td>
</tr>
<tr>
<td>M-39</td>
<td>Depression</td>
</tr>
<tr>
<td>Magic Crystal</td>
<td>Migraine, PMS, depression, SADS, mania, nausea</td>
</tr>
<tr>
<td>Mango x Northern Lights # 5</td>
<td>Pain, nausea, insomnia, anxiety</td>
</tr>
<tr>
<td>Mango</td>
<td>Back pain, nausea</td>
</tr>
<tr>
<td>Masterkush</td>
<td>Nausea</td>
</tr>
<tr>
<td>Medicine Woman</td>
<td>Diabetic neuropathy, general pain, general seizures, glaucoma, Hepatitis C, muscle spasms, nausea, radiculopathy</td>
</tr>
<tr>
<td>Misty</td>
<td>Hepatitis C, back pain, insomnia, nausea</td>
</tr>
<tr>
<td>Motarebel Oguana Kush</td>
<td>Nerve Pain, muscle spasms, back pain, headache, insomnia</td>
</tr>
<tr>
<td>Mountainberry</td>
<td>Insomnia, migraine, pain</td>
</tr>
<tr>
<td>Northern Lights # 1</td>
<td>Arthritis</td>
</tr>
<tr>
<td>Northern Lights # 2</td>
<td>Nausea, insomnia</td>
</tr>
<tr>
<td>Northern Lights x Jamaican</td>
<td>arthritis</td>
</tr>
<tr>
<td>Northern Lights x Cinderella 99</td>
<td>Depression</td>
</tr>
<tr>
<td>Northern Lights x Shiva</td>
<td>Body pain, back pain, toothache</td>
</tr>
<tr>
<td>Northern Lights</td>
<td>Anxiety, radiculopathy, insomnia</td>
</tr>
<tr>
<td>Northernberry</td>
<td>Pain</td>
</tr>
<tr>
<td>Oregon 90</td>
<td>Insomnia, joint pain, RLS, pain, nausea</td>
</tr>
<tr>
<td>Original Mystic</td>
<td>Epilepsy</td>
</tr>
<tr>
<td>Strain</td>
<td>Conditions</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>OG Kush Purple</td>
<td>Cachexia, degenerative bone/disc disease, Post-Traumatic Stress Disorder</td>
</tr>
<tr>
<td>Phaght Betty</td>
<td>Neck/spine pain</td>
</tr>
<tr>
<td>Queen Bee</td>
<td>Migraine</td>
</tr>
<tr>
<td>Sensi Star</td>
<td>Migraine, anxiety, insomnia, nausea</td>
</tr>
<tr>
<td>Shiskaberry x Dutch Treat</td>
<td>Anxiety, nausea</td>
</tr>
<tr>
<td>Shiskaberry x Hash Plant</td>
<td>Nausea</td>
</tr>
<tr>
<td>Skunk #1</td>
<td>PMS</td>
</tr>
<tr>
<td>Sour cream</td>
<td>Insomnia, joint pain, nausea</td>
</tr>
<tr>
<td>Stardust 13</td>
<td>Pain, nausea, insomnia</td>
</tr>
<tr>
<td>Strawberry Cough</td>
<td>Back pain, depression</td>
</tr>
<tr>
<td>Super Impact x AK-47</td>
<td>Pain, insomnina</td>
</tr>
<tr>
<td>Super Impact</td>
<td>Nausea, insomnia, muscle pain, depression, anxiety, SADS, mania</td>
</tr>
<tr>
<td>Super Silver Haze</td>
<td>Nausea, depression</td>
</tr>
<tr>
<td>Super Thai</td>
<td>Depression</td>
</tr>
<tr>
<td>Sweet Blu</td>
<td>Degenerative bone/disc disease, diabetic neuropathy, edema, fibromyalgia, muscle spasms, nausea, neck/spine pain</td>
</tr>
<tr>
<td>Sweet Tooth #3</td>
<td>Depression</td>
</tr>
<tr>
<td>Trainwreck x Herijuana</td>
<td>Nausea</td>
</tr>
<tr>
<td>Trainwreck</td>
<td>Anxiety, arthritis, diabetic neuropathy, depression</td>
</tr>
<tr>
<td>TW x LUI</td>
<td>Arthritis, nausea</td>
</tr>
<tr>
<td>TX</td>
<td>Arthritis, asthma, general pain, general seizures, glaucoma, MS</td>
</tr>
<tr>
<td>Ultra Green</td>
<td>Insomnia</td>
</tr>
<tr>
<td>Wakeford</td>
<td>Anxiety, nausea, insomnia</td>
</tr>
<tr>
<td>White Rhino - aka Medicine Man</td>
<td>Body pain, back pain, joint pain, insomnia</td>
</tr>
<tr>
<td>White Russian</td>
<td>Pain, nausea</td>
</tr>
<tr>
<td>White Widow x Big Bud</td>
<td>Depression</td>
</tr>
<tr>
<td>White Widow</td>
<td>Cachexia, Hepatitis C, Post-Traumatic Stress Disorder</td>
</tr>
</tbody>
</table>
SUBSTANCE ABUSE PREVENTION

We recognize the need to provide a safe environment that helps patients avoid substance abuse and misuse. Personal responsibility is critical to participating in our programs.

In 2009, approximately 28.5 million Americans age 12 and older had abused marijuana at least once in the year prior to being surveyed. Source: National Survey on Drug Use and Health (Substance Abuse and Mental Health Administration Web Site). By the time they graduate from high school, about 42 percent of teens will have tried marijuana, according to the NIDA.

According to the federal government, long-term marijuana use can lead to psychological addiction. It estimates that 9 percent of people who use marijuana will become dependent on it. The number goes up to about 1 in 6 in those who start using young (in their teens) and to 25-50 percent among daily users.

We offer workshops, clinics, and materials about the potential medical marijuana abuse will be integrated in all patient visits, materials, and outreach. Our staff also is trained to recognize possible signs of drug abuse.

REFERENCES AND RESOURCES

A. Marijuana Medical Research

  http://brain.oxfordjournals.org/cgi/content/full/129/5/1081
- A Collection of Articles That Address Research on Marijuana – National Institute on Drug Abuse (NIDA)  
  http://www.drugabuse.gov/NIDA_Notes/NN0058.html
  http://www.nap.edu/catalog.php?record_id=6376
- Marijuana Research and Dissemination Update - March 2004 – NIDA  

B. Marijuana Fact Sheets

- Cannabis myths: how harmful is cannabis? – UK DrugScope  
  http://www.drugscope.org.uk/resources/mediaguide/cannabismyths.htm
- Marijuana: Facts for Teens – National Institute on Drug Abuse (NIDA)  
  http://www.drugabuse.gov/MarijBroch/Marijteens.html
- Marijuana: Facts Parents Need to Know – NIDA
http://www.drugabuse.gov/MarijBroch/MarijparentsN.html

- NIDA Research Report: Marijuana Abuse
  http://www.drugabuse.gov/ResearchReports/Marijuana/default.html

C. Opposing Viewpoints

- (CON) Marijuana Myths & Facts: The Truth Behind 10 Popular Misperceptions – ONDCP

- (PRO) Myths and Facts About Marijuana – Drug Policy Alliance Network
  http://www.drugpolicy.org/marijuana/factsmyths/

- Medical Marijuana – ProCon.org
  http://medicalmarijuana.procon.org/

D. Information on the Web

- Michigan Department of Health: Medical Marijuana Program
  www.safeaccessnow.org

- Science-based information about the effects of marijuana on your brain and body.
  http://www.marijuana-info.org/


  http://teens.drugabuse.gov/facts/facts_mj1.asp


-214-
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Total Possible Points</th>
<th>2117 CEDAR INC</th>
<th>2117 CEDAR INC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>——</td>
<td>2117 S CEDAR ST</td>
<td>2117 S CEDAR ST</td>
</tr>
<tr>
<td><strong>Scoring Insights</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Marketing, Advertising and Promotion

<table>
<thead>
<tr>
<th></th>
<th>4</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant provides several marketing, advertising and promotion examples and one minor prevention example (e.g., no advertising or product marketing appealing to minors, website with SEO, etc.) but doesn't get into much more detail. Lacks sufficient details and minor prevention examples. 2 good examples and 1 minor example of minimization in the marketing plan 11/30/18 R8.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2. Tangible Capital Investment in the City of Lansing

<table>
<thead>
<tr>
<th></th>
<th>15</th>
<th>15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant provides a listing of proposed capital investment in Lansing (including the initial provisioning center 1 band contract for $300K, $1 million startup costs) and subsequent grow facility (27K sq. ft.), processing operation, testing, etc.). Indicates $27.8 million investment associated with integrated operations (including $2 million for R&amp;D property at 1520 E. Cavanaugh).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. Job Creation (Integrated System)

<table>
<thead>
<tr>
<th>Overall number of jobs created</th>
<th>5</th>
<th>4</th>
</tr>
</thead>
</table>
| "Applicant indicates 240 Lansing jobs will be created by their medical marijuana operations but does not provide much detail about them. Update 11/13/2018 since construction jobs are temporary, 120 jobs are counted with limited detail about full-time or part-time, benefits and job descriptions. Poor detail like lack of number full-time vs part-time, pay of salary positions, etc. 1 point deducted."

4. Financial Structure and Financing

<table>
<thead>
<tr>
<th></th>
<th>3</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates no bank financing expected, provides proof of capital in the form of bank statements ($702K) and CPA-attested liquid assets availability of &gt; $1.66 million.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

5. Plans to Integrate Facility with Other Establishments

<table>
<thead>
<tr>
<th></th>
<th>2</th>
<th>2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates they intend to integrate their initial provisioning center with 1.500 plant, 27,000 sq. ft. grow facility and other future operations.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6. Charitable Plans and Strategies

<table>
<thead>
<tr>
<th></th>
<th>4</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates they will contribute a minimum of $100,000 annually to charitable causes. Indicates they have been selected by Northern MI University to educate students (legaldocument provided), and included proof of checks totaling $600 already written to local organizations.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th></th>
<th>5</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant indicates their initial provisioning center will generate about 20 jobs and 50 construction jobs. Employee training is fully discussed and list of job titles and wages provided. Fail short of an optimal level of details.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

8. "Amount and Type of Compensation (PC)"

<table>
<thead>
<tr>
<th></th>
<th>2</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant states that the provisioning center employees will earn between $15 and $50/hour but does not provide an optimal amount of support details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<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>
</tr>
<tr>
<td>Applicant indicates that all of the hourly positions will be paid no less than $15 to $50/hour.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Projected Annual Budget and Revenue (PC)</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Applicant provides a single line item number for annual budget and revenue (e.g., $1.02 million in expenses and $1.2 million in revenue) but no other details. Lacks sufficient details.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. Sufficient Financial Resources</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Applicant provides litigation compliance verification forms for all stakeholders. Applicant proves they have well over $100,000 in the bank and over $1 million in liquid assets.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Business Experience</td>
<td>5</td>
<td>4</td>
</tr>
<tr>
<td>Applicant indicates they have 2+ years as a medical marijuana caregiver, plus decades of business experience (e.g., business management, pharmacy, bookkeeping). Lacks the optimal amount of applicable business experience. Updated 11/2/2018. The stakeholders have 5+ years of MM ownership experience, below 10+ years optimal experience to receive full points. Staff provides additional caregiver experience. No change in points.*</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>5</td>
<td>4</td>
</tr>
<tr>
<td>&quot;Met or exceeded requested items. Update 11/2/18 Letter to cure for sanitation and floor plans from building safety - 1 pt deducted.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. Buffering between residential zoned areas and establishment</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Very close to residential. Updated score using a better measurement tool. 9/18/18 residential zoning found on the north, east and south side of property which falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15. Increased traffic on side streets will be scored lower</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>&quot;Major traffic control renovations needed. Updated upon further review, score charged 8/13/18 bp. Traffic recommends closing S. Cedar Entrance which would push traffic to neighborhood. Applicant recommends closing side entrance to avoid traffic into neighborhood. Positive review of traffic plan. Updated 9/25/18 Highest score in all categories, except driveway safety which is adequate score per traffic expect.&quot;</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>7</td>
</tr>
<tr>
<td>&quot;Minimum requirement for Security plan Tier 2. 2pts., traffic 5 pts. Strong traffic patterns, parking, and circulation. 11/30/2018 Update Security plan review by LPD notes a guard, off-site video storage, waiting room, and a safe, but no equipment specs or barrier information. Consider Tier 2 and equal 2 points. No change in score. Just further detail.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17. Plan to meet with neighborhood organizations,</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Have a plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18. Improvements made or proposed to building</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>&quot;Exterior Cosmetic Improvements. Plans do not reflect improvements just existing structure. Updated 9/24/18 using a more accurate measurement tool $700,000 of construction improvements which is 39% of the SEV of $176,300 which is above the optimal 125% SEV Investment amount.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Plan to minimize/eliminate traffic</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Inadequate traffic plan. Land Use considered traffic plan after further review 8/23/18 bp.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Plan to minimize/eliminate noise</td>
<td>2</td>
<td>1</td>
</tr>
</tbody>
</table>
| "Inadequate noise plan Update 12/5/18. Plan to install of a brick wall of fence is listed in Land use and effect on surrounding neighborhood section (tab 26). However, it is inferred that it is a noise plan or would reduce noise. 1 pt added."
<p>| 21. Plan to minimize/eliminate odor | 3 | 0 |
| Inadequate odor plan |
| 22. LPD Complaints | 4 | 1 |
| 1 assault report - 1 damage to property report - 1 fight call - 1 trouble w/ subject call - 2 stolen Auto calls - 3 medical/check welfare calls - 1 other report, 8 calls (9+ calls = 1 pt) 12/26/2018 no change to score. Applicant currently operating another business at this location. |
| 23. Demo of Regulatory Compliance | 4 | 3 |
| &quot;No tax history. 1 point deduction for building safety.&quot; |</p>
<table>
<thead>
<tr>
<th>24. Litigation History</th>
<th>2</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Score</strong></td>
<td>100</td>
<td>75</td>
</tr>
</tbody>
</table>

"All stakeholders have a complete litigation history with no or minimal issue. Updated 11/28/18 after further review. "No record of acts of detrimental to security, safety, morals." is determined insufficient."
EXHIBIT 5
Budget Breakdown- Proposed Master Plan for Medical Marijuana Park
Development & Provisioning Centers

<table>
<thead>
<tr>
<th>3208 South Martin Luther King Blvd. Provisioning Building (20 Jobs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchase of Property</td>
</tr>
<tr>
<td>Construction Improvements</td>
</tr>
<tr>
<td>Total Cost for 3208 Investment</td>
</tr>
</tbody>
</table>

1520 E. Cavanaugh Development

Processing & Grow Building (phase 1) (50 New Jobs) *currently under construction*

Purchase of 1520 Cavanaugh                                      $1,500,000
Construction Improvements Grow & Processing                     $3,000,000
Total Cost of Current Investment                                $4,500,000
  ▪ 1,500 plant count
  ▪ Processing License

Grow & Processing Building 60,000 sq. ft. (90 New Jobs)

Exterior Construction Cost @ $70 per sq. ft.                   $4,200,000
Interior Improvements Grow & Processing                       $6,000,000
Total Cost of Improvements                                    $10,200,000
  ▪ Add 2 (1,500) plant count

Processing Building 14,400 sq. ft. (20 New Jobs)

Exterior Construction Cost @ $150 per sq. ft.                  $2,160,000
Interior Improvements - Equipment                             $2,000,000
Total Cost of Processing Building                              $4,160,000

Testing Facility Building 11,800 sq. ft. (15 New Jobs)

Construction Cost @ $200 per sq. ft.                          $2,360,000

Research & Development Building 18,000 sq. ft. (10 New Jobs)

Construction Cost @ $200 per sq. ft.                          $3,600,000

Secure Transportation Service Building 20,500 sq. ft. (15 New Jobs)

Construction Cost @ $150 per sq. ft.                          $3,075,000
Total Current & Planned Future Construction                   $27,895,000

2117 South Cedar Street Provisioning Building (20 Jobs)

Purchase of Property                                           $300,000
Construction Improvements                                      $700,000
Total Cost for 2117 Investment                                 $1,000,000

Total Capital Investment (240 New Jobs to Lansing)            $29,795,000
# Medical Marijuana Provisioning Centers Scoring Criteria

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Business Plan &amp; Job Creation</strong></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</td>
<td></td>
</tr>
<tr>
<td>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>15</td>
</tr>
<tr>
<td>Job creation</td>
<td>5</td>
</tr>
<tr>
<td>Financial Structure and Financing</td>
<td></td>
</tr>
<tr>
<td>Plans to integrate grower facility with other establishments</td>
<td>2</td>
</tr>
<tr>
<td>Charitable plans and strategies</td>
<td>4</td>
</tr>
<tr>
<td>Job creation</td>
<td></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><strong>Total - Business Plan/Job Creation</strong></td>
<td>50</td>
</tr>
<tr>
<td>Criteria</td>
<td>Maximum Points</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>----------------</td>
</tr>
<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><strong>Total - Financial Stability &amp; Experience</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>Buffering between residential zoned areas and establishment</td>
</tr>
<tr>
<td>Traffic pattern(s)</td>
<td>Increased traffic on side streets will be scored lower</td>
</tr>
<tr>
<td>Resident safety</td>
<td>Entrance and exit on main streets, adequate parking not on residential streets, Quality of Security Plan</td>
</tr>
<tr>
<td><strong>Total - Land Use</strong></td>
<td></td>
</tr>
<tr>
<td>Criteria</td>
<td>Maximum Points</td>
</tr>
<tr>
<td>----------</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><strong>10</strong></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>Applicant/Stakeholder History</strong></td>
<td></td>
</tr>
<tr>
<td>Applicant/stakeholders record of acts detrimental to security, safety, morals, good order, general welfare</td>
<td>Lansing Police D complaints/incidents</td>
</tr>
<tr>
<td></td>
<td>Demonstration of regulatory compliance</td>
</tr>
<tr>
<td></td>
<td>Business litigation history</td>
</tr>
<tr>
<td><strong>Total - Applicant/Stakeholder History</strong></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.
RESUME REGARDING EXPERIENCE WITH MEDICAL MARIHUANA OR A RELATED INDUSTRY

In support of an Application for a Medical Marihuana Licensure to operate a provisioning center at 2117 South Cedar Street, Lansing, Michigan 48910, the Applicant, 2117 Cedar Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation submits the following statement identifying the qualifications and business experience of their staff:

Our staff (along with additional staff to be added) is knowledgeable and experienced as evidenced by the following:

SHAREHOLDERS AND STAKEHOLDERS

a. Frank Mastroianni

Frank Mastroianni has a degree in Business Management from Adrian College. For ten years, he was the manager of sales and marketing for Italy and American Construction. He has been a licensed realtor for the past fifteen years and is a multi-million dollar producer. For the past nine years, he has been a licensed residential builder.

Frank Mastroianni (either individually or as a sole corporate owner) owns five commercial properties and twelve residential properties in Southeast Michigan with a net worth in excess of four million dollars. He is also a co-owner of several additional commercial properties in Southeast Michigan. He is married (Rachel) with five sons.

Frank Mastroianni (Con Yank Inc.) has been approved by the City of Warren to operate a Medical Marihuana Grow Facility under the City of Warren local ordinance.

b. Joseph Aiello

Joseph Aiello has an extensive background experience in business management. For almost twenty years, Joseph Aiello was a design
engineer working with companies such as Ford Motor Company, General Motors, and Chrysler Corporation. For almost ten years, he managed government contracts as a civilian engineer with the United States Army (Sterling Heights, Michigan). For the past two years, he has been running an engineering firm in Florida, Manatee Engineering Services, LLC. This firm alone has a net worth in excess of twenty million dollars. He is married (Angela) with three children.

Joseph Aiello has the individual knowledge and ability to run a successful Medical Marihuana Provisioning Center. He routinely attends seminars and workshops to keep up to date with rules and regulations within the industry at both the state and municipal levels. He is actively involved in securing licensing for several other medical marihuana facilities in the State of Michigan.

Joseph Aiello has been instrumental and has an ownership in facilities that have been licensed by municipalities including:

**City of Warren, Michigan**
24224, Mound Road, Warren, Michigan
Growing medical marihuana
March 2017 – Present
Occupancy approved by Building Department, City of Warren, Michigan (1 City Square #305, Warren, Michigan 48093 Tel. (586) 574-4504)

**City of Ferndale, Michigan**
903 E. Lewiston, Ferndale, Michigan
Medical Marihuana Provisioning Center
Municipal license granted in 2014 by Ferndale City Counsel (City Hall Annex, 5694 Second Avenue, Ferndale, Michigan 48220. Email: SusanDuncan@cityofferndale.org)

**City of Detroit, Michigan**
14917 Gratiot, Detroit, Michigan
Medical Marihuana Provisioning Center
November 2017 – Present
Municipal license granted by: Board of Zoning Appeals, City of Detroit (Coleman A. Young Municipal Centre, 2 Woodward Avenue, Suite 212, Detroit, Michigan 48226 Tel. (313) 224-3595)
OPERATORS AND EMPLOYEES

c. Margaret (Margo) Carter

Margaret Carter studied medical billing at Baker College for two years. For six years until 2009, she managed the pharmacy and health/beauty departments at Arbor Drugs in Warren. She was the Manager at Brightside Dental in Warren where she was in charge of employees, patient relations, booking, billing, payroll, medical billing and inventory management. For five and one-half years, she managed an automotive collision shop (Steve's Custom Color) again being in charge of insurance claims, ordering, scheduling, payroll and accounting. She has additional experience in accounting and bookkeeping when she worked for S&D Rental Properties, LLC for five years.

Margaret Carter has been a licensed medical marihuana patient and caregiver for more than two years. Her own experience with pain management makes her an exceptional asset with patient-caregiver interactions. She has extraordinary knowledge of the various medicines that can be used to treat patients. She constantly attends seminars and events to stay current with new products and new treatment plans. She can offer suggestions and dosage instructions to help the patient. In addition to her accounting and management skills, she is responsible, well-organized and has great social skills.

d. Sara Mokoski

Sara Mokoski (a Lansing resident) has a bachelor's degree in Kinesiology from Michigan State University. For three and one-half years, she was employed at the MSU Bakery where she collaborated with the HR Department, did marketing of products online, and fulfilled product orders. She was a Behavioral Therapist for a year and one-half treating autistic children when employed by Responses located in Portage, Michigan. She was also a Personal Trainer for six months when she worked for Compel Fitness in Lansing.

As a licensed medical marihuana patient, Ms. Mokoski has first hand experience with medical marihuana products and their effects on the human body. Her graduate degree also provides invaluable experience as Kinesiology involves the scientific study of human body movement, addressing the physiological, biomechanical, and psychological mechanisms of movement.
LOCATION AND DISTANCE TO BUFFERED USES

3208 MLK Inc. is located a distance greater than all required for buffered uses.

a. The closest school is as follows: (1,000 feet per 1300.13(A)(1))
   Lansing Charter Academy – 4,127 feet

b. The closest library is as follows: (500 feet per 1300.13(A)(2))
   John W. Chi Memorial Medical Library – 4,787 feet

c. The closest public playground is as follows: (500 feet per 1300.13(A)(2))
   Washington Park – 3,934 feet

d. The closest commercial childcare organization (non-home occupation) is as follows:
   (500 feet per 1300.13(A)(2))
   Loretta’s Daycare – 1,834 feet

e. The closest church is as follows: (500 feet per 1300.13(A)(2))
   Lansing Church of the Brethren – 1,861 feet

f. The closest substance abuse prevention services or substance abuse treatment and
   rehabilitation services is as follows: (500 feet per 1300.13(A)(2))
   Mid-Michigan Recovery Services Inc. – 1,719 feet
Distance From To: Calculate distance between two addresses, cities, states, zipcodes, or locations

Enter a city, a zipcode, or an address in both the Distance From and the Distance To address inputs. Click Calculate Distance, and the tool will place a marker at each of the two addresses on the map along with a line between them. The distance between them will appear just above the map in both miles and kilometers. The tool is useful for estimating the mileage of a flight, drive, or walk. Can easily determine the distance between 2 cities as well.

Distance From: 5208 S Martin Luther King Jr Blvd, Lansing
Distance To: Lansing Charter Academy, Lansing, Mi

Calculate Distance

Straight line distance: 0.37 miles, 0.60 kilometers (km), 1965 feet, 599 meters
Driving distance: 0.78 miles, 1.26 kilometers (km), 4127 feet, 1258 meters

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Other tools to help with distance questions

In addition to this tool we also offer a couple other tools that can help find the distance on a map. You can use the mileage calculator to compare the difference between driving or flying between 2 cities. If on the other hand you want to click multiple points on the map in order to find the distance of the entire line you can do that with the distance calculator. We are always trying to find better ways to provide you with the information you need. If you have a suggestion please let us know.
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Distance From: 
Distance To: 
Calculate Distance

Straight line distance: 0.73 miles, 1.18 kilometers (km), 3858 feet, 1175 meters
Driving distance: 0.91 miles, 1.46 kilometers (km), 4787 feet, 1459 meters

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Google Map Developers
not associated with google maps

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Distance From: 3208 S Martin Luther King Jr. Blvd, Lane Distance To: Washington Park, Lansing, Michigan Calculate Distance

Straight line distance: 0.51 miles, 0.82 kilometers (km), 2680 feet, 817 meters
Driving distance: 0.75 miles, 1.20 kilometers (km), 3934 feet, 1199 meters

Google
You can share or return to this by using the link below
https://www.mapdevelopers.com/distance_from_to.php?
&from=3208%20S%20Martin%20Luther%20King%20Jr.%20Bldg%20Lansing%20MI&to=

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Distance From: 3208 S Martin Luther King Jr. Blvd, Lansing, Michigan 3200 S Washington, Lansing, Michigan Calculate Distance

Straight line distance: 0.26 miles, 0.42 kilometers (km), 1393 feet, 425 meters
Driving distance: 0.35 miles, 0.56 kilometers (km), 1834 feet, 559 meters

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Google Map Developers
not associated with google maps

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Distance From: 3206 S Martin Luther King Jr Blvd, Lansing
Distance To: Lansing Church of the Brethren, Lansing

Calculate Distance

Straight line distance: 0.35 miles, 0.57 kilometers (km), 1861 feet, 567 meters
Driving distance: 0.44 miles, 0.72 kilometers (km), 2349 feet, 716 meters

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**Google Map Developers**

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Distance From: 3208 S Martin Luther King Jr Blvd, Lansing, Michigan
Distance To: 913 W Holmes, Lansing, Michigan

Calculate Distance

---

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2) Free Access - No Sign Up
3) Get Free Directions and Maps

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EXHIBIT 9
City of Lansing Medical Marijuana Ordinance Distance Requirement

The required separation distances from Medical Marijuana Provisioning Centers to the various buffered uses listed in Section 1300.13(1) & (2) is measured at a right angle from the nearest edge of the proposed provisioning center building to the centerline of the road, along the centerline of the road and connecting at a right angle to the nearest point of the buffered use building or public playground equipment located in a park.

Avenue A

- Proposed Dispensary Building
- Existing School
- Existing church, child care center, substance abuse center or playground equipment in a park

500+ Feet

1000+ Feet

centerline of street
<table>
<thead>
<tr>
<th>Applicant Name</th>
<th>Test Points</th>
<th>GREEN SQUARE HOLDINGS LLC</th>
<th>GREEN SQUARE HOLDINGS LLC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant Address</td>
<td>5031 S. CEDAR ST.</td>
<td>5031 S. CEDAR ST.</td>
<td>Scoring Insights</td>
</tr>
</tbody>
</table>

14. Buffering between residential zoned areas and establishment

<table>
<thead>
<tr>
<th>Points</th>
<th>5</th>
<th>3</th>
</tr>
</thead>
</table>

Landlord issue. Updated score using a better measurement tool 9/18/18: 224 ft from residential zoning which falls short of the optimal distance of 1/4 mile (1320 feet) to receive full points.
EXHIBIT
Site Plan

Proposed Provisioning Center
Existing Building
3208 South Martin Luther King Blvd.
Lansing, Mi. 48910
**Disclaimer:** BS&A Software provides BS&A Online as a way for municipalities to display information online and is not responsible for the content or accuracy of the data herein. This data is provided for reference only and WITHOUT WARRANTY of any kind, expressed or inferred. Please contact your local municipality if you believe there are errors in the data.
LAND USE AND EFFECT ON SURROUNDING NEIGHBORHOOD

In support of an Application for a Medical Marihuana Licensure to operate a provisioning center at 3208 South Martin Luther King Jr. Blvd, Lansing, Michigan 48910, the Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation submits the following statement how their land use will have an effect on the surrounding neighborhood:

1. The proposed use of the establishment as a Medical Marihuana Provisioning Center is consistent with land use for the surrounding neighborhood and not have a detrimental effect on traffic patterns and resident safety.

2. Pedestrian access on South Martin Luther King Jr. Blvd will be clearly marked.

3. There will be no exit onto a residential street.

4. Speed will be clearly posted for travel in the parking lot.

5. There will be complete ADA access with appropriate ramps and handrails.

6. There will be proper lighting and increased visibility for pedestrians and invitees.

7. The parking lots will be smooth and maintained.

8. The proposed hours of operation will be between 9:00 am and 10:00 p.m.

9. The proposed site is zoned for commercial use and will be used in that manner.

10. The proposed site is located on a main thoroughfare – South Martin Luther King Jr. Blvd.

11. Ingress and egress from the proposed facility will be directed solely onto South Martin Luther King Jr. Blvd. and not towards any side street that would lead towards residential property.
12. There is ample parking at the proposed facility and there will be signage posted not to park on any residential side street.

13. To reduce traffic in/out of the facility, scheduled appointment times with patients will be arranged. The facility will be able to accept call-in orders to predict traffic patterns to minimize traffic and noise.

14. By reducing the traffic flow in and out of the proposed location, this will also minimize the amount of noise to the surrounding neighborhood.

15. Any use of medical marihuana on the premises is strictly prohibited. This will eliminate any odors to the surrounding neighborhood.

16. There will be additional buffering between the proposed location and any residential neighborhood by the installation of a block wall or fencing.
DETRIMENTAL ACTS TO SECURITY, SAFETY, MORALS, GOOD ORDER, AND GENERAL WELFARE

FRANK MASTROIANNI, states the following:

1. I am a Director of 3208 MLK Inc. and have the authority to issue this statement.

2. The Applicant, 3208 MLK Inc., a subsidiary of FMJRL, Inc. and a Michigan Corporation has submitted an Application for a Medical Marihuana Licensure to operate a provisioning center at 3208 Martin Luther King Jr. Blvd, Lansing, Michigan 48910.

3. The Applicant and the stakeholders of the Applicant have no record of acts detrimental to security, safety, morals, good order or general welfare.

4. The Applicant and the stakeholders of the Applicant have no record of any complaints or incidents with the Lansing Police Department.

5. The Applicant and the stakeholders of the Applicant have no record of any business litigation history.

6. The Applicant has committed no violations of the 2016 Ordinance #1202 Moratorium.

Frank Mastroianni, Director
3208 MLK Inc.
April 25, 2019

3208 MLK Inc  
32411 Mound Rd  
Warren, MI 48092

Dear Provisioning Center Applicant:

Your appeal document has been received. The appeal before the City of Lansing Medical Marihuana Commission will be held during the regularly scheduled meeting of the Commission on Friday, May 17, 2019, at 2:00 PM in the City Clerk Election Unit Training Room, 2500 South Washington Avenue in Lansing. Due to the necessity to complete Phase 1 of the Lansing licensing process, the hearing must occur on May 17, 2019; there is no option for an alternative hearing date.

Per Lansing City Ordinance 1300.3(e), the Commission’s review of the appeal shall not be de novo. The Medical Marihuana Commission Appeal will become a matter of public record. 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. The presentation timeline used by the Commission during the meeting for your appeal presentation is enclosed. No additional materials that were not included in the originally submitted application may be submitted for review.

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.

Sincerely,

Chris Swope, Master Municipal Clerk
Lansing City Clerk
Mr. Aiello,

We were able to get our commissioners to agree to another date just for your appeal. The new date is Tuesday, May 28 @ 2 p.m. in the Clerk's Training Room at 2500 S Washington Ave.

Jennifer Smith-Zande  
Licensing & Elections Clerk  
Lansing City Clerk's Office  
124 W. Michigan Avenue   |   Lansing, MI 48933  
City Hall: 517-483-4313  |   FAX: 517-377-0068  
SWOC: 517-483-4485  |   FAX: 517-483-4493  
Direct: 517-483-4151  
Jennifer.Smith-Zande@lansingmi.gov  
Website | Facebook | Twitter

Chris Swope, GMOC/MMC

-----Original Message-----
From: chris chrisaiello.com chris@chrisaiello.com
Sent: Friday, May 10, 2019 4:06 PM
To: Biehler, Deb Deb.Biehler@lansingmi.gov
Subject: [EXTERNAL] 3208 MLK appeal scheduled May 17, 2019 we need adjournment

Hi Deb,

Please pass this onto anyone who will listen at this point. I tried hiring 2 lawyers today to cover for aaron and I without luck. He is off to Mexico tomorrow. I leave next thursday for Indy to be with my daughter.

If anyone can hear my scream for help please pass it on. Don’t let me miss my daughters rational competition in indy on friday! 11 months of training for one tournament I can’t miss it please.

Someone please adjourn this beyond next friday or next monday, tuesday or wednesday.