

EXHIBIT D

Illinois Department of Agriculture Cannabis Infuser License Application:

Exhibit D Infusing Plan

Infuser Acknowledgment

As per the Cannabis Regulation and Tax Act [410 ILCS 705], the infuser applicant has read and acknowledges the following statements provided by the Department of Agriculture and other departments of the State of Illinois as referenced in this exhibit.

Only a cannabis business establishment that has been issued a license by the Department under the Act and this Part shall own or operate a cultivation center, craft grower, infuser, or transporter. A cannabis business establishment, including each principal officer, board member, agent and employee, shall not:

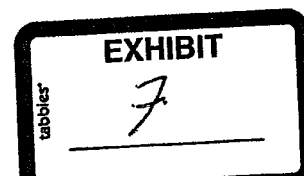
- Produce, manufacture, or store cannabis in any place except in those areas designated in the license;
- Produce, manufacture, or store cannabis for use outside of Illinois;
- Sell, deliver, transport, or distribute cannabis to any person or entity other than a dispensing organization registered with the IDFPR, a testing laboratory approved by the Department of Agriculture, or a State regulatory entity or law enforcement;
- Enter into an exclusive agreement with any other cannabis business or establishment;
- Refuse to conduct business with any other cannabis business establishment that has the financial ability to pay for products or services, except where prohibited by law.

" Infuser" means a facility operated by an organization or business that is licensed by the Department of Agriculture to directly incorporate cannabis or cannabis concentrate into a product formulation to produce a cannabis-infused product. [410 ILCS 705//11 - 10]

An infuser organization may share premises with a craft grower or a dispensing organization, or both, provided each licensee stores currency and cannabis or cannabis-infused products in a separate secured vault to which the other licensee does not have access or all licensees sharing a vault share more than 50% of the same ownership.

"Infuser agent" means a principal officer, board member, employee, or agent of an infuser.

"Cannabis Business Establishment" means a cultivation center, craft grower, infuser, dispensing organization, or transporter.[410 ILCS 705//11 - 10]



"Cannabis Container" means a sealed, traceable container, or package used for the purpose of containment of cannabis or cannabis-infused product during transportation. [410 ILCS 705//11 - 10]

"Cannabis-infused Product" means a beverage, food, oil, ointment, tincture, topical formulation, or another product containing cannabis that is not intended to be smoked. [410 ILCS 705//11 - 10]

"Cannabis Product" means a product containing medical or adult-use cannabis either in a physical form or infused with an extracted resin.

"Cannabis Waste" means all cannabis byproduct, scrap, harvested cannabis, and cannabis - infused products not intended for distribution to a dispensing organization.

"Enclosed, Locked Facility" means a room, greenhouse, building, or other enclosed area equipped with locks or other security devices that permit access only by cannabis business establishment agents working for the licensed cannabis business establishment or acting pursuant to the Act to cultivate, process, store, or distribute cannabis. [410 ILCS 705//11 - 10]

"Enclosed, Locked Space" means a closet, room, greenhouse, building or other enclosed area equipped with locks or other security devices that permit access only by authorized individuals under the Act. "Enclosed, locked space" may include:

A space within a residential building that is the primary residence of the individual cultivating 5 or fewer cannabis plants that are more than 5 inches tall and includes sleeping quarters and indoor plumbing. The space must only be accessible by a key or code that is different from any key or code that can be used to access the residential building from the exterior; or

A permitted premises where cannabis is grown, cultivated, harvested, stored, weighed, packaged, sold or processed for sale, under control of the permitted facility.

A structure, such as a shed or greenhouse, that lies on the same plot of land as a residential building that includes sleeping quarters and indoor plumbing and is used as a primary residence by the person cultivating 5 or fewer cannabis plants that are more than 5 inches tall, such as a shed or greenhouse. The structure must remain locked when it is unoccupied by people. [410 ILCS 705//11 - 10]

"Manufacturing" or " Manufacture" means the process of converting harvested cannabis material into a finished product by manual labor and/or machinery designed to meet a specific need or customer expectation, either directly or indirectly by extraction from substances of natural origin, or independently by means of chemical synthesis, or by a combination of extraction and chemical synthesis.

"Natural Processing" or " Naturally Produced" means the preparation of the harvested cannabis without significantly changing its physical form.

"Sale"" means any form of delivery, which includes barter, exchange or gift, or offer therefor,, and each such transaction made by any person whether as principal,, proprietor,, agent,, servant or employee.

Infusing Plan

The applicant has been following the industry of cannabis infused products and has found that edibles and topicals perform well in the cannabis market. The proposed infuser applicant can fulfill the need of the community with their manufacturing plan that is set in place.

Manufacturing is a general term that includes processes which extract and concentrate THC and or CBD. Once concentrated, these extracts can be added, packaged with a variety of products created and distributed to retail facilities. The proposed infuser applicant will maintain a safe and efficient manufacturing facility that will meet the high demand for cannabis products.

Cannabis Products in High Demand

The cannabis infused products that are in high demand offer a variety of different options to consume and or use cannabis infused products. The following lists give a breakdown of what those are. Although the infuser will only be manufacturing edibles, the consideration to add a full variety of cannabis infused products will be described in this exhibit. As all products are typically in high demand, the infuser applicant may add to their line of production in an effort to provide a steady flow of products to the consumers in the State of Illinois. Conducting meetings with retailers will also give the infuser an opportunity to tap into the market and industry needs.

Flower
Indica
Sativa
Hybrid
CBD rich flower
CBG rich flower
CBN rich flower
Concentrates
Hash
Diamonds
Sauce

• Budder	• Sub-linguals
• Wax	• Topicals
• Kief	• Salves
• Rosin	• Muscle rubs
• Edibles	• Drops
• Cookies	• Patches
• Tinctures	• Lotions
• Brownies	• Beverages

Edibles are a very popular item in the cannabis infused market. They make it convenient for some who are not comfortable with smoking. Edibles can range from cookies, brownies, lollipops, muffins, breath strips, gummies, mints and much more. Many of the manufacturers in the industry take pride in offering an edible that is enticing to the flavors the consumer is looking for, as well as a discreet way of consuming them.



The proposed applicant will ensure their cannabis edibles will not exceed a maximum of 10 mg of THC per serving and 100 mg of THC per package. Other Cannabis products such as tinctures, capsules, and topicals, will be limited to a maximum of 1000 Milligrams per Package. Edible products will not be shaped like a human, animal, insect or fruit. Some potentially hazardous foods, such as meat and seafood, and other products requiring refrigeration, will be prohibited for sale with cannabis products. The manufacturer has no intention of producing any cannabis infused meat or fish products. All products manufactured by the infuser will be in compliance with the Illinois Department of Agriculture rules and regulations. Procedures and protocols will be strictly followed and will never divert other than what is stated as rule.

Potential Products Offered

Cannabis Infused Edibles

Baked goods (brownies, cookies, muffins, pies, cakes, and sweet bread)
 Candy (lollipops, gummies, jelly beans, chocolate, hard candy, taffy, caramel)
 Beverages
 Capsules
 Honey
 Peanut/nuts (almonds, walnuts, peanuts, pistachio nuts, pine nuts, cashews, pecans, chestnuts, hazelnuts)
 Oil (cooking) Butter

Non-edible Cannabis products

Pre-rolls
 Thai sticks
 Vape pens filled with distilled cannabis oil
 Kief
 Hash
 Crumble
 Shatter
 Live resin
 Tinctures/Wax/Budder

Market Demand Performance

The infuser applicant will have the ability to produce its product in an efficient manner that will allow for production in mass quantities, including the shelf life of the product. Utilizing the edible films in many different application forms allows for an assorted ability to be used in the cannabis infused market. The applicant has the potential to produce up to 25,000 edible films in one 8-hour day of work. This offers a steady flow of cannabis infused products, including the added benefit of the edible films ability to be used in multiple applications. Described in detail below the products the infuser will manufacture have many benefits to be a great asset to the cannabis edible market. With the precise dosing capability, the edible films can be used for almost anything, and put the consumer at ease that they know exactly what they are consuming when eating a product that has THC. The true nature of this product provides for safe consumption and the ability to know that the quality assurance is backed by the company. This also gives the local dispensaries a way to promote safe consumption of cannabis products.

Edible Screen Infusion Process

(Confidentiality Notice)

Notice: The Illinois legislature has recognized a specific need to protect confidential business information from public dissemination. Patterned after Exemption 4 of the federal Freedom of Information Act, 5 U.S.C. § 522(b)(4), Section 7(1)(g) of the Illinois act exempts from disclosure "trade secrets and commercial or financial information." The term "trade secret" for purposes of FOIA has been construed to be broader than the definition found in the Illinois Trade Secrets Act. (765 ILCS 1065/)

Therefore, [REDACTED] claims that the manufacturing operating procedures and protocols as well as all additional attachments providing information about products used or machinery used submitted in this document withhold information that is considered as a "trade secret" and or "confidential". All statements below have been identified as such. [REDACTED] basis of confidentiality in good faith belief is presented that the information marked is confidential and constitutes a trade secret and is otherwise exempt from public disclosure under Section (765 ILCS 1065/)

Edible Labels/Film Benefits

The proposed applicants take pride in the ability to infuse precise dosing, which will not exceed the allowed amount of THC as per the State of Illinois' guidelines and regulations. This has a major advantage over the production process because it allows for all products to be precise every time a batch is produced. Applying the edible screen ink is a process that allows the applicant to add additional visual effect to the edible label/films which we can put the state warning THC, a picture of the Cannabis plant and even a QR code directly on the product. The QR code can be scanned and it will take the customer directly to the Certificate of Analysis providing the information of exactly what is in the edible label/film. This specific feature of the applicants infused products has a quality unlike any other edible product on the market and has many more uses.

The applicants process of production is a cleaner method than a many other traditional food manufacturing systems. The process of making edible films infused with cannabis has great advantages that the infuser applicant has ensured for producing a quality and compliant product. The "slurry", an edible plant-based polymer, will be manufactured in a licensed kitchen, that has

an FDA interstate license and all other licenses required by the federal government. The screen material is food grade. The screen frame, vacuum base and draw bar are all made of aluminum.

This allows for a cleanup of utensils or machinery used easy to maintain sanitary requirements as well as being as clean as new every time. The squeegee used to pass over the edible films is food grade plastic and also an easy cleanup as any excess product left on can be cleaned very quickly and within regulations. Lastly the slurry is essentially screened onto food grade DuPont Mylar sheets. These mylar sheets come from an FDA regulated company that are packaged appropriately when delivered to avoid any contamination during transport.

Applications for Edible THC Labels

Also available in CBD labels or for Minty oral strips with vitamin and rest aid options

We offer the only Edible Film solution for dispensing controlled precision amounts of THC safely. Take the worry away of offering a controlled dosage every time. A direct mouth application as a label applied to a food surface such as a cookie, brownie, lollipop and/or rice crispy treat.

As noted in the news, the ability to designate and identify that this is a medical/recreational application right ON the edible and that it's "NOT" for children is a major concern. Each of the current participating states are concerned and soon it will be a national concern as well. Application of 100mg can be printed with portion cuts so a consumers ingest a controlled dosages For example; a 100mg edible label can be printed with 5 cut lines designating five 20mg dosages.

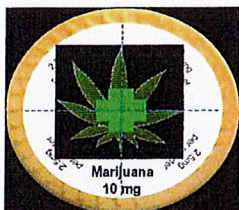
This unique product is flexible, its melts in the mouth or stomach, is Kosher, Vegan and plant based. We can design a film for you for virtually any application, it can be tinted and flavored with a variety of flavors. We can add in selected vitamins, minerals or botanicals which can be printed on the strip. including 4 color process as well as adding a **QR** code link or **AR** adding any and all audio, video, or web site information.

Our process encapsulates the THC, for a long shelf life (over 18 months) and a controlled dosage. There is nothing like our product currently available for medical and recreational markets.

With our label system there is no need for the expense of a on-site kitchen ...purchase gourmet items, apply our edible label with **your** message. This label will solve government concern with lot tracking and acts as a product warning label which eliminates any concern of someone eating a food item laced with THC.



Treat



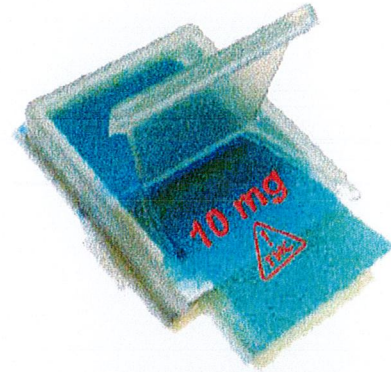
cookies



cupcakes



This is shown actual size,
The strip is 1" x 1 ¼"



Film Strip Cassette
holds 10 1" x 1.25"
THC Strips

Edible Film Production Synopsis

The edible labels/films slurry is based on vegetable polymers and will be manufactured to all State specifications and regulations in a clean, sanitized production area. The proposed applicant's manufacturing partners have a combined 65 years of experience in developing edible labels/films going back to 1976. Additionally, the partners are named on over 25 edible film patents.

The range of edible labels/films can vary from "breath strips", to labels for applications on cookies, brownies, chocolates, chocolate bars, lollipops, pancakes, pizza and much more. The edible labels/films can be flavored in a variety of flavors, color tinted, and can also contain selected botanicals, vitamins and minerals.

Utilizing a mathematical formula, the applicant will take a specific amount of our film base and add in (based on the furnished percent of Delta 9 THC) a controlled amount of the THC. The applicant will encapsulate the THC with our slurry thus ensuring the most precise and exact dosage and a shelf stable film. This combination allows delivery of precise dosing to the consumer, the desired final milligrams of THC, whether in the form of 5 mg, or 10 mg per state limitations. For the edible label/films the applicant will utilize all FDA approved materials in the manufacturing phase. The Mylar screen, mesh material, is an aluminum frame and upheld with the certified health requirements for the cleanliness for use our machine and the work area.

The final product is the combination of the slurry and the THC that will be furnished by a licensed Illinois extractor, and will be purchased through BioTrack THC to follow the strict guidelines for the State of Illinois product infusing requirements. The specifications for the THC isolate (if available) or distillate will be between 88% - 96% pure Delta 9 THC. All final production will be performed in a separate secured manufacturing area, that will always be clean, sanitized, and temperature controlled room within the infuser facility.

Production Press Process

The production press film maker hot presses pellets of polymers at temperatures between room temperature and 250 °C. Films of consistent thickness can be produced with diameters of 15 mm and controlled thickness of 15 to 1500 um. The temperature of the production press is controlled digitally. To form the label/films, a hydraulic press is used to push two heated plates together. The plates are then heated to a specific temperature, (i.e. the sample melt point), before operation and during use. When making a label/film of 10 mg, the applicant will first place a sample that is placed into the required sizing ring and then placed between the heated plates with foil protective covers.

Once the sample has been inserted and the plates are at the correct temperature, pressure is applied (at 0.5 T) to hot press the film – this will be achieved by the manual operation of a pressure knob. Following film production, the plates rapidly return to room temperature by a cooling plate, following which the new film will be removed. Following its production, the film will be placed on a Spec card (an adhesive substrate) for IR Analysis (testing the absorption of the slurry) in the label/film if needed.

Using the production press film maker allows us to produce a high-quality thin film with precise dosing every time in less than 5 minutes – a time significantly shorter than non-conventional methods. The applicant's production press film manufacture procedures also has the advantage of continuous processing and real-time monitoring for the precise dosing unique feature our infused products can produce.

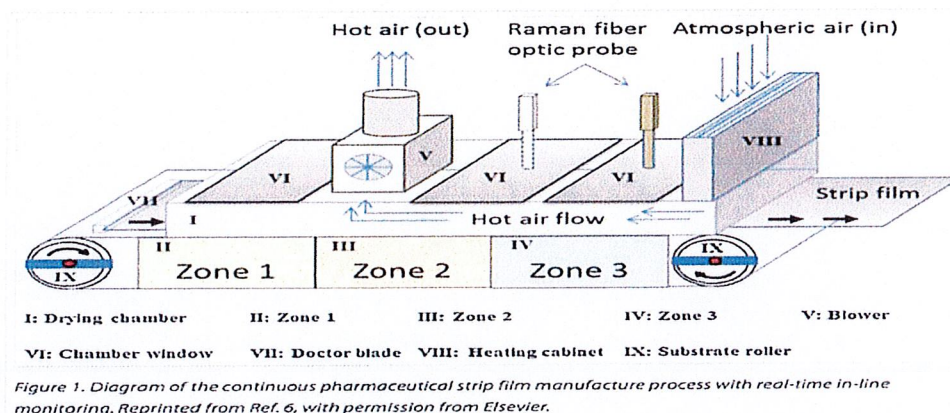
Aqueous Slurry Casting

The aqueous casting technique for strip film making creates a slurry. This is in contrast to the more prevalent solvent casting technique which involves dissolving poorly water-soluble drugs in organic solvent to be removed upon drying. Solvent casting imposes a potential limit on the drug loading in the resulting film, as exceeding this limit may lead to uncontrollable precipitation of drug particles upon removal of organic solvent during drying. Therefore, the technique the applicant will use is the more suitable for placement of the THC distillate or isolate within the strips for quality control of the product and precise dosing.

To avoid any issues of over loading water soluble cannabis distillate or isolate, the slurry casting technique preserves the THC particles in the crystalline state and is suspended in an aqueous solution prior to the edible film production. This process involves mixing a viscous polymer solution with the cannabis infused distillate or isolate, in the form of an aqueous suspension or powder. The resulting mixture is then cast at a specified thickness using a doctor blade and then it is gently dried using a combination of conduction and convection.

Drying Process

A diagram below, borrowed from the Quartz Oven Manufacturer described as Figure 1. is example of how the applicant's drying process will work. The close monitoring during the drying process will prevent any contamination by air or human touch.



The film drying process is inherently continuous, which allows for multi-stage drying where different drying regimes and temperatures can be employed at each stage. This gives the applicant the ability to easily customize the drying process to suit the specific application when infusing the THC isolate or distillate. Humidity control will also be implemented to influence the residual water content in the film. This oven does not require any special requirements, and does not need a hood to be utilized. It is essentially a heat press.

Product Testing Control and Third-Party Lab Testing

Prior to production, samples from our initial setup test batch will be sent to a licensed and accredited, State of Illinois, third party lab testing facility. The contracted third-party lab then confirms the "dosage in milligrams" in the edible film providing us with confirmation that the product is in compliance with all Illinois state regulations. This batch testing will be done before proceeding with all final productions that we will process when there is a "new" batch being produced. Once we receive confirmation from the lab and receive the COA (Certificate of Analysis) we will then proceed with the batch production. The edible labels/films are then baked dry, cooled and are processed for the next step of adding the edible screen (or ink) process. All COA information on each batch will be printed on the final exit packaging of the product before leaving the infuser facility.

Finished Goods Controls

The strips will be processed into the final cassette packaging and labeled with the Primary Panel information required by the State of Illinois and sealed in a 4 mil zip lock bag for moisture and dryness protection. Additionally, the applicant will pull out a daily batch sample amount of the strips. These "finished goods" will be placed into our safe or in the designated and secured and

area as a controlled daily batch reference as required by the Illinois Department of Public Health (IDOPH) as a standard known as “Batch Production Records”, which is the documentation of performance, every time a new batch is produced.

By implementing the finished goods controls, this will be a part of our standard operating procedure, which will be incorporated into BIOTRACK THC compliance, inventory control, cannabis waste management, keeping records of product complaints, and the ability to track recalls if there is ever a case of that.

Quality, Purity And Consistency

Requirements for Edible Products

Edible products will not contain more than 10 mg of THC per serving, nor will they contain more than 100 mg of THC per package. Only cannabis, cannabis concentrate, or terpenes will be used. Edible products that consist of more than a single serving shall be scored, delineated, or otherwise marked to indicate one serving or packaged in a manner such that a single serving is readily at identifiable.

Additional Manufacturing Options and Procedures

The Infuser considers other methods of manufacturing as additional option to produce cannabis infused products within their facility. These methods would include ethanol and non-ethanol extraction and are perfect for making solvent processed cannabis extracts. The following information are methods and product that can be made by methods of extraction.

Potential Extraction Methods:

- Supercritical ethanol extraction
- Water and ice extraction
- Sifter cam with dry ice
- Resin press

Ethanol Closed Loop Extraction Devices

Should the infuser applicant utilize the closed-loop ethanol extraction device, a top choice would be to use a machine manufactured by Precision Extraction Solutions. Precision has an extensive manual available with purchase of their product that describes the Standard Operating Procedures specific to maintaining the device in a safe manner. The Standard Operating Procedures described in their manual include:

- Procedures to validate all seals, fittings and pressurized vessels.
- Proper procedures regarding ethanol filling and safe handling.
- Proper procedures for machine cleaning and maintenance practices.

- Procedures regarding regular servicing and replacement of worn out gaskets, clamps, nuts/bolts, and finish.
- Procedures for material prep and column filling.
- Extraction run processing.
- Stepwise procedures for safely dealing with unexpected problems and issues that may arise during an extraction run.

The manufacturing manager will review these procedures with the staff on a monthly basis and document that this has been performed monthly, the manufacturing manager will review procedures on a regular basis and review with the staff as needed.

Ethanol Extraction

The extraction device will come with a certification document that will contain the signature and stamp of a licensed professional engineer in the serial number of the extraction unit being certified. Before being used, the extraction operation facilities will be reviewed by the local fire code official and will meet all required fire, safety, and building code requirements. The manufacturing/infusing area of the building will be entered through a separate and secured area.

The ethanol extraction process creates phase changes in carbon dioxide, utilizing temperature and pressure. Ethanol is known as a “tunable solvent” making it extremely versatile for creating a multitude of products by controlling temperature and pressure. These phase changes create an environment to isolate differing weights of components in the plant material.

The liquid then has properties making them ideal as a solvent. The “tunability” of ethanol extractions enables the targeting of maximum outputs of the THC depending on the type and quality of cannabis material being used this eliminates undesirable compounds such as chlorophyll from the final product. Ethanol fluid extraction methodology results in delivery of a clean, unaltered and consistent yet flexible product. The primary reason to use ethanol is to create a pure, clean, quality oil that is safe to produce with little to no post processing. No toxic solvents are required. Ethanol is efficient and inexpensive. Ethanol is also a sanitizing agent and results in prolonged shelf life with the proper system and environments.

Non-Ethanol Processes

The following products are able to be produced without the utilization of the closed-loop ethanol device:

Kief

Kief is otherwise known as dry sift. It is produced by separating trichomes (the crystalline structures that coat the outside of the dried cannabis flower) by ethanol extraction from the remainder of the plant. The plant material is placed inside a sifter can/bag. Dry ice is placed (the solid form of carbon dioxide), inside the can/bag with plant material. The sifter is lightly agitated over a flat surface for approximately 2-5 minutes. The quality can vary as result of the size of the micron screen used for sifting

Hash

Hash is the isolated dry head from plant matter. Hash can be produced utilizing ice water extraction which is one of the most common processes used to create quality non-solvent hash. The goal is to isolate the trichome heads which house the essential oils of cannabis. The process starts by placing micro bags into a bucket with pores in the 20 µm-220 µm range. The bucket is filled with water and ice and the plant materials are placed into the bucket. The contents are stirred vigorously while cannabis is added to it. The water will foam up (the more foam the better). After 20-30 minutes remove the specks separately and dry and cure for them seven days.

Live Resin

Typically, cannabis is cured and dried before getting processed into extraction. Cryogenic freezing sets this method apart. The plant material is frozen shortly after harvest and the result is an extract closely resembling the flavor of a living cannabis plant. There are special handling requirements for live resin. Solvent temperature, sometimes, moisture reabsorption/elimination and changes in oven parameters need to be addressed.

Hash Butter

Hash butter is better known as “hashish”. This product is made from the compressed resin glands found on the cannabis plant. Hashish can vary in appearance from black, brown, reddish and even “creamy”. It may be hard and brittle or soft and pliable. Using water/agitation and a system of micron bags the trichomes are separated from the resin material. The collected resin glands are compressed and cured.

Non-edible Requirements

A non-edible cannabis product that is manufactured for adult use will not contain more than 1000 mg of THC per package. Manufactured topical medicinal products will not contain more than 2000 mg of THC per package. Topical cannabis products will only contain ingredients permitted for standard cosmetic manufacturing in accordance with federal regulations.

Manufacturing Requirements:

All manufacturing operations will seek to minimize the potential for growth of microorganisms, allergen cross-contamination and deterioration of cannabis products. These will be a result of strict control of the manufacturing environment, equipment, packing, and holding locations. Any adulterated cannabis will be either disposed of or reprocessed. Sauces, gravies, dressings, dipping solutions and other preparations will be maintained at proper temperatures and stored in the non-secure refrigerator in the manufacturing kitchen.

Day-To-Day Manufacturing Operations

Operational Period: 8AM to 5PM daily.

- Each morning, the temperature and humidity factors (45%) in the storage area are reviewed, any fluctuations of temperature and humidity will be noted and reported to the onsite Manager.
- Equipment will be started, and all surfaces will be wiped down for sanitary requirements prior to production beginning.
- Products will be visually inspected, before being processed, for mold and mildew.
- Batch numbers will be verified, and lab results recorded prior to processing.
- The manager will determine the amount of end product, record in tracking system, and □ record product waste weights in the tracking system.

Any liquid plant material that has been removed from the inventory will be recorded in the Daily Log and the Tracking Number updated in the system with the manner of destruction. Any shortage, missing plants, etc. will result in an Internal Incident report and a notification to the Police Department.

Hazard Analysis

Biological hazards, chemical hazards, and physical hazards will be defined at each stage of the manufacturing process for the specific entity and procedures will be developed to mitigate against adverse effects. Each piece of equipment and machinery will be examined daily to document proper functioning. Machinery will only be utilized for the manufacturers documented intended use.

Training Program

A training program will be implemented by the infuser business within 2 days of the start of employment. Health and safety hazards, proper management of chemicals, emergency procedures, security procedures, and cleaning and maintenance requirements are examples of topics that will be addressed in the training program, and are explained in detail in the employee handbook. All personnel who prepare, handle, or package edible products will complete an Illinois food handler program and post their certificate in the manufacturing kitchen. The infuser applicant will hold meetings regularly for updates on training for regulations within the state and any “modifications” made by the infuser.

Inventory Control

The Proposed Applicant(s) sales transactions and POS system will always meet all data tracking system requirements of the State of Illinois. A data tracking system and/or other platforms as approved by the State of Illinois will be implemented and strictly followed in order to maintain records of all cannabis product movement and make those records available for audit. All cannabis material will be tracked via standard inventory control protocols from receipt, through the manufacturing stage and finally the packaging and shipment process in accordance with requirements.

At the end of each day product will be stored securely. All loose product will be placed in the secure room that is locked and secured as a restricted access area. Security officers will not have

access to this room when operations personnel are not on site as a checks and balances measure. The Proposed Applicant(s) will meet all data tracking system requirements for the State of Illinois. The inventory tracking and record keeping system will ensure that:

1. The Proposed Applicant(s) will register/record any incoming cannabis material, which includes entering the ID numbers into the tracking system software
2. The Proposed Applicant(s) will record each cannabis sale or transfer transaction
3. Any cannabis product that is considered waste during the process will be recorded and entered the tracking software, along with a daily disposition of how these were disposed of, if any.
 - All inventory over the last 30 calendar days will be counted utilizing the Cannabis data tracking system and independently verified by a second person.
 - If there is a discrepancy in inventory the company shall conduct an audit.
 - The company shall notify the Illinois Department of Agriculture within 24 hours if an audit reveals a discrepancy that is not within 5% of the documented inventory has occurred, if theft or diversion is suspect the licensee shall immediately report this to the Illinois department of Agriculture.

Weights and Measures

All weighing devices will be approved, tested, and sealed in accordance with the requirements in chapter 5 (commencing with section 12500) of division five of the business and professionals code, and registered with the county sealer consistent with chapter 2 (commencing with section 12240) of division five of the business and professionals code. All cannabis or cannabis products will be weighed when the product is bought or sold by weight or count, packaged for sale by weight or count, and counted for entry into the data tracking system.

Batch Production Record

A written batch production record will be generated each time a batch of cannabis product is manufactured. The UID will be specific for the batch. The density of equipment and processing lines using the production of the batch will be documented. Cleaning and sanitizing of production equipment will be recorded, including a record of proper labeling. The density and weight of each component used and the actual yield. The percentage of theoretical yield will be compared, and this ratio recorded. The results of any testing performed during batch production will be recorded. All procedures will be documented in cannabis data tracking system, including the name of the person performing the procedure.

Packaging and Labeling

As per the State of Illinois, the state regulations on cannabis sales, the dispensary will not sell more than the maximum per-individual daily limit established for cannabis goods, including edibles. All cannabis products manufactured in the facility will be packaged before they are released for distribution. Cannabis and manufactured products will be packaged in plain, opaque, tamper-proof and childproof containers. Packaging will not betray depictions of the product, cartoons or images other than the company's name and/or logo nor will it be packaged in a way that is appealing to children. Below is a visual of THC content warning signs that can be used.



- Product Identity
- Universal Symbol
- Net Weight or Volume
- "Cannabis Infused"
- Cannabinoid Content (in mg)

- Manufacturer name and website
- Date of manufacture and packaging
- Government warning statement
- UID Number
- Batch or Lot Number
- Instructions for Use
- List of ingredients
- Allergens (if applicable)
- Artificial Food Coloring (if applicable)
- Expiration, Use By, or Best by Date (if applicable)
- Keep refrigerated or refrigerate after opening (if applicable)
- Sodium, Sugar, carbohydrates, total fat
- "For Medical Use Only (if applicable)"

Child resistant packaging will include hinged lid containers, pop top bottles, reversible vials, etc. Child resistant packaging will conform to federal consumer product safety regulations and American Society for Testing and Materials (ASTM) standards. For products with multiple servings the package will be resealable. Cannabis product labels will include an agreed list and limited nutritional facts. There will be mandated warning statements about the amount of THC content.

- Package tag is designed specifically for transfer use
- Package tag is perforated with the upper and lower information being the same
- The larger portion staying with the package
- Lower portion can be attached to another device such as a container at retail
- The words “cannabis-infused” will be placed on the label in bold six point font text
- A list of product ingredients in descending order of predominance by weight or volume will be put on the label.
- Major food allergies will be listed.
- For edibles, artificial food colorings contained product and the amount of sodium, sugar, carbohydrates in total fat per serving in grams will be on the label.
- Product expiration date

In further detail as per Section 1000.420 Packaging and Labeling of Recreational and Medical Cannabis and Cannabis-Infused Products, the infuser applicant has read and acknowledges the following regulations that the State of Illinois, and the Illinois Department of Agriculture have set in place and will strictly follow all procedures for packaging and labeling cannabis products;

- a) Each cannabis product produced for sale shall be registered with the Department on forms provided by the Department. Each product registration shall include a label and the required registration fee (Section 1000.140). The registration fee is for the name of the product offered for sale and one fee shall be sufficient for all package sizes.
- b) All harvested cannabis intended for distribution to a dispensing organization must be packaged in a sealed and labeled medical cannabis container.
- c) Packaging of any product containing cannabis shall be child-resistant and light-resistant consistent with current standards, including the Consumer Product Safety Commission standards referenced by the Poison Prevention Act.
- d) Each cannabis product shall be labeled by the cultivation center prior to sale to a dispensary and each label shall be securely affixed to the package and shall state in legible English:
 - 1) The name and P.O. Box of the registered cultivation center where the item was manufactured;
 - 2) The common or usual name of the item and the registered name of the cannabis product that was registered with the Department of Agriculture pursuant to subsection (a);

- 3) A unique serial number that will match the product with a producer batch and lot number to facilitate any warnings or recalls the Department of Agriculture or producer deems appropriate;
- 4) The date of final testing and packaging, if sampled, and the identification of the independent testing laboratory;
- 5) The date of manufacture and "use by" date;
- 6) The quantity (in ounces or grams) of cannabis contained in the product;
- 7) A pass/fail rating based on the laboratory's microbiological, mycotoxins, and pesticide and solvent residue analyses, if sampled;
- 8) Content list of the following, including the minimum and maximum percentage content by weight for subsections (d)(8)(A)(i) through (iv):
 - i) delta-9-tetrahydrocannabinol (THC);
 - ii) tetrahydrocannabinol acid (THCA)
 - iii) cannabidiol (CBD);
 - iv) cannabidiol acid (CBDA); and
 - v) any other ingredients besides cannabis.

The acceptable tolerances for the minimum percentage printed on the label for any of subsections (d)(8)(A)(i) through (iv) shall not be below 85% or above 115% of the labeled amount;

- 9) A statement that the product is for medical use and not for resale or transfer to another person.
- e) Medical Cannabis-Infused Products. All items shall be individually wrapped or packaged at the original point of preparation. The packaging of the medical cannabis-infused product shall conform to the labeling requirements of the Illinois Food, Drug and Cosmetic Act and, in addition to the other requirements set forth in this Section, shall include the following information in English on each product offered for sale or distribution:
- 1) All ingredients of the item, including any colors, artificial flavors and preservatives, listed in descending order by predominance of weight shown with common or usual names;
 - 2) The following phrase: "This product was produced in a medical cannabis cultivation center not subject to public health inspection that may also process common food allergens.";

- 3) Allergen labeling as specified in the Federal Food, Drug and Cosmetics Act, Federal Fair Packaging and Labeling Act, and the Illinois Food, Drug and Cosmetic Act;
- 4) The pre-mixed total weight (in ounces or grams) of usable cannabis in the package (the pre-mixed weight of medical cannabis used in making a cannabis-infused product shall apply toward the limit on the total amount of medical cannabis a registered qualifying patient may possess at any one time);
- 5) A warning that the item is a medical cannabis-infused product and not a food must be distinctly and clearly legible on the front of the package;
- 6) A clearly legible warning emphasizing that the product contains medical cannabis and is intended for consumption by registered qualifying patients only;
- 7) Ingredients List
 - A) A list of the following ingredients, including the minimum and maximum percentage content by weight for subsections (e)(7)(A)(i) through (iv):
 - i) delta-9-tetrahydrocannabinol (THC);
 - ii) tetrahydrocannabinol acid (THCA);
 - iii) cannabidiol (CBD);
 - iv) cannabidiol acid (CBDA); and
 - v) any other ingredients besides cannabis.
 - B) The acceptable tolerances for the minimum percentage printed on the label for any of subsections (e)(7)(A)(i) through (iv) shall not be below 85% or above 115% of the labeled amount.
- f) THC and CBD Container Content and Restriction
Each individually packaged medical cannabis-infused product, even if comprised of multiple servings, shall include the total milligram content of THC and CBD and may not include more than a total of 100 milligrams of active THC.
- g) The label shall not contain any of the following information:
 - 1) Any false or misleading statement or design;

- 2) Any seal, flag, crest, coat of arms or other insignia likely to mislead the qualified patient to believe that the product has been endorsed, made or used by the State of Illinois or any of its representatives; or
 - 3) Depictions of the product, cartoons or images other than the cultivation center's logo. Medical cannabis-infused products shall not bear a reasonable resemblance to any product available for consumption as a commercially available candy.
- h) It is a violation for anyone other than the end user to alter, obliterate or destroy any label attached to a medical cannabis container to administer the product.
- i) For each commercial weighing and measuring equipment device used at a facility, the cultivation center must:
- 1) Ensure that the commercial device is licensed pursuant to the Weights and Measures Act and the associated administrative rules (8 Ill. Adm Code 600);
 - 2) Maintain documentation of the licensure of the commercial device; and
 - 3) Provide a copy of the license of the commercial device to the Department for review upon request.

Good Manufacturing Procedures

Personnel Standards and Qualifications

All Employees must be at least 21 years of age, must pass a criminal background check showing the Employee to have had no convictions of a felony under State or Federal law or of any State, Federal or local law concerning the manufacture, possession or sale of controlled substances or alcoholic liquor.

Disease control - Cleanliness

All employees will undergo evaluation and will be excluded if they demonstrate any source of microbial contamination that could potentially threaten the cannabis products. These include open lesions such as boils, sores or infected wounds. This will extend both to the individuals involved in the manufacturing and packaging process. If it is possible for the individual to cover the source of possible contamination (such as by wearing an impermeable cover like gloves), the individual will be able to perform their duties following this action.

All individuals working in direct contact with cannabis products, cannabis product-context surfaces, and cannabis product packaging materials shall conform to hygienic, sanitary processes necessary to protect against allergen cross-contamination and contamination of cannabis product while on duty. These methods include:

- Wearing appropriate outer garments to protect against allergen cross contact and contamination of cannabis products, context services, and/or packing materials.

- Maintaining adequate personal cleanliness.
- Washing hands thoroughly in an adequate hand-washing facility before starting work, after each absence from the workstation, and any time when the hands may have become soiled or contaminated, and sanitizing hands if necessary, to protect against contamination with undesirable organisms. There is a designated handwashing area within the manufacturing space of the facility for this purpose.
- Removing all unsecured jewelry and other objects that might fall into cannabis products, equipment, or containers and removing hand jewelry that cannot be adequately sanitized during periods in which cannabis products are manipulated by hand. If jewelry cannot be removed, it may be covered by material which can be maintained in an intact, clean, and sanitary condition in which effectively protects against contamination by these products of the cannabis products, canvas product surfaces or cannabis product-packaging materials next line-maintaining any gloves, if they are used in cannabis product handling in an intact, clean and sanitary condition.
- Wear appropriate hairnets, headbands, caps, beard covers, or other restraints in an effective matter.
- Storing clothing or other personal belongings in areas separate from those where cannabis products are exposed or equipment or utensils are washed.
- Changing into the appropriate Vital Bloom company uniform at the beginning of the shift.
- No eating food, chewing gum, drinking beverages, and/or tobacco may be used at the time when manufacturing activities are being undertaken.
- Taking any other necessary precautions to protect against contamination by microorganisms or foreign substances (including perspiration, hair, cosmetics, tobacco, chemicals, and medicines applied to the skin).

Grounds Maintenance

The grounds of the premises will be controlled and kept in a condition that prevents contamination of components and cannabis products. The grounds will be inspected daily at the beginning of a shift by the manager the procedures for adequate maintenance of the grounds will include;

- The proper storage of equipment, removal of litter and waste, and cutting of weeds and grass with an immediate vicinity of the cannabis manufacturing facility so as to limit the ability for breeding or harborage for pests.
- Any standing water or food borne bacteria/parasites will be removed.
- Determine if materials or situations in the manufacturing holdings adjacent to the facility represent a significant risk of contamination of the facility and take appropriate measures to eliminate any pass, dirt, and/or filth that pose a source of cannabis product contamination.

Sanitary Procedures

The general manager will examine the physical facilities daily to make sure that the building as well as any fixtures are maintained in a clean and sanitary condition and kept in good repair.

- Utensils, surfaces and equipment will be examined by the manufacturing manager daily at the beginning of the shift and maintained in a condition to prevent against allergen cross-contact and contamination of cannabis product or products components, cannabis product-context services, or cannabis product-packaging materials
- Cleaning compounds and sanitizing agents used in cleaning and sanitizing procedures will be examined daily for visible signs of undesirable microorganisms. Toxic cleaning compounds, sanitizing agents, and pesticide chemicals in the manufacturing area will be examined and confirmed to be stored in a way as to not result in possible contamination of product
- If the use of pesticides is required to control pests this will only be performed under precautions and restrictions under the direct observation of the manufacturing manager or by a licensed professional.
- All cannabis product-context surfaces used for manufacturing, processing, packaging or holding low moisture cannabis products shall be maintained in a clean, dry and sanitary condition. This will be verified before use by the manufacturing manager. When such surfaces are cleaned, they shall be sanitizing thoroughly and dry before subsequent use
- single-use articles (such as utensils intended for one-time use, paper cups and paper towels) will be stored, handled and disposed of in a manner that protects against allergen cross contact and contamination of cannabis products, cannabis product-contact services, or cannabis product packaging materials. Responsibility to implement this policy falls upon the manufacturing manager or facility manager.
- Daily, at the beginning of shift, the manufacturing manager will evaluate the instruments and controls used for measuring, regulating, or recording temperatures, pH, water activity, or other conditions to prevent the growth of undesirable microorganisms. The manufacturing manager will calibrate these daily if applicable.

Temperature Controls

The manufacturing manager will review daily the integrity of the interior temperature and if necessary the water used in the manufacturing process. There will be one to two refrigerators in the manufacturing area for any products that require refrigeration to keep from spoiling. The first will be in the manufacturing kitchen and will be used in the creation of products to be infused during the manufacturing process. At the beginning of every shift, each refrigerator or cold storage component will be assessed and temperature confirmed to be 41°F. The second refrigerator will be in the manufacturing secure storage safe from and will contain any product in

the process of being manufactured that was not completed the same day or the cannabis product that is used for infusion.

Product Recall Procedures

Any communication that contains any allegation, written, electronic, or oral, expressing concerns for any reason relating to the manufacturing process will be designated a “product complaint”. Examples include: foul odor, off taste, illness or injury, disintegration, color variation of material in cannabis product container, improper packaging, etc. These will be recorded and reviewed at the monthly manufacturing quality control meeting. Any of the factors described above could necessitate a product recall. A cannabis data tracking system (BIOTrack THC) will be used to determine where a specific batch or a portion of a specific batch was dispensed or distributed. All recalled products will be stored in the quarantine room for minimum of 72 hours before destruction. These processes will be recorded utilizing video surveillance as will the process of rendering the cannabis unusable.

In keeping with State of Illinois health and safety regulations, the infusion facility will effectuate a recall if the safety of a consumer is ever at risk. For example, if a cannabis cultivator recalled its product due to pesticide residue, we would determine that there is risk to our consumers and recall. The standard for risk assessment will be on a case by case basis, however the proposed applicant will take consumer safety at the highest level of concern. Additionally, a recall will be implemented if any products fail to meet quality standards. We will establish and implement written procedures for recalling cannabis products stored at the dispensary that are determined to be misbranded or adulterated.

These procedures will include: factors which necessitate a recall, personnel responsible for implementing the recall procedures, and notification protocols. This includes a mechanism to notify all customers that have, or could have, obtained the product, including communication and outreach via media, as necessary and appropriate. Additionally there will be a mechanism to notify any licensees that supplied or received the recalled product, and instructions to the general public and/or other licensees for the return and/or destruction of recalled products. A Recall Coordinator will be appointed to oversee the process of any required recall.

Waste Management and Pesticide Disposal

Any recyclable waste generated by the applicant facility will be recycled per applicable State and local laws, ordinances, and rules. Any cannabis waste, liquid waste, or hazardous waste will be disposed of in accordance with Section 8 Ill. Adm. Code 1000.460 of the emergency changes to the Act, except, to the greatest extent feasible, all cannabis plant waste will be rendered unusable by grinding and incorporating the cannabis plant waste with compostable mixed waste to be disposed of in accordance with Section 8 Ill. Adm. Code 1000.460(g)(1).

As per Section 1000.460 of the Illinois Environmental Protection Act, cannabis waste must be stored, secured, locked, and managed in accordance with State regulations the submitted and approved operations and management practices plan in the applicant’s facility. The following list will be part of the waste management plan and will follow all regulations. Where required the applicant will use

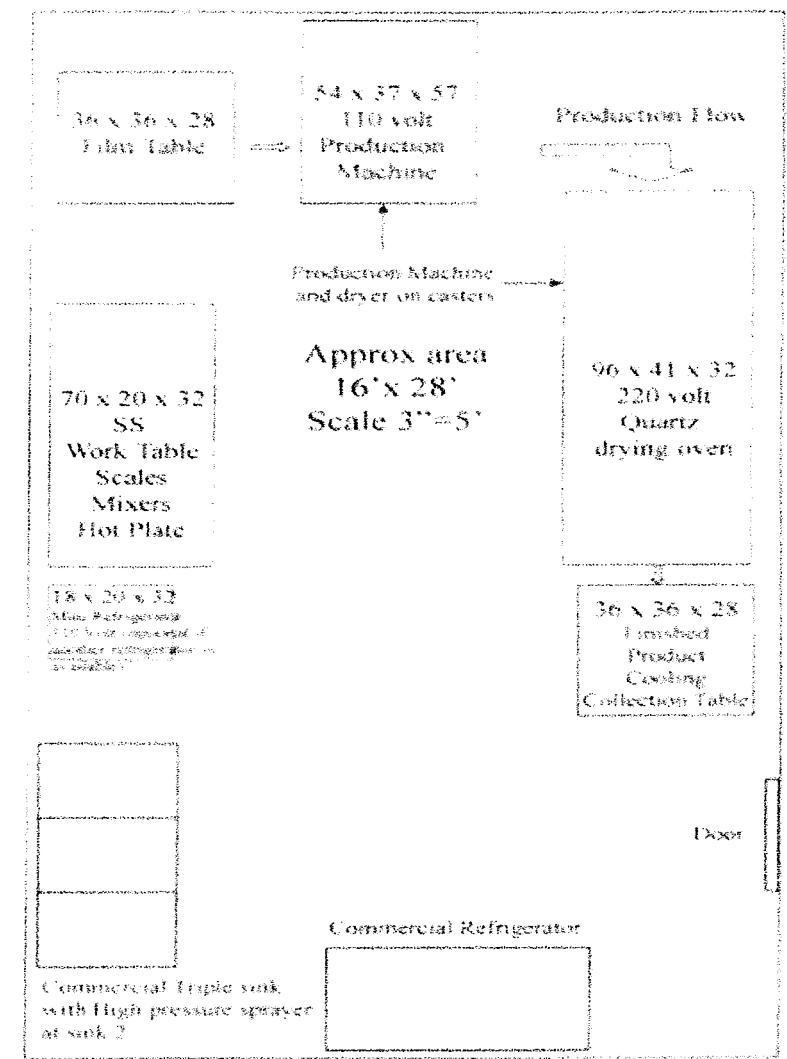
a “Material Safety Data Sheet” for any Pesticide or other agricultural chemical used or stored in its facility and where the product is used or stored.

- **Liquid Waste.** Liquid waste from an infusion center shall be disposed of in compliance with the Illinois Environmental Protection Act and 35 Ill. Adm. Code.
- **Hazardous Waste.** Disposal of hazardous and chemical waste must be conducted in a manner consistent with federal, State and local laws.
- **Cannabis waste** must be rendered unusable following the methods set forth in this Section prior to leaving a cultivation center. Disposal of the cannabis waste rendered unusable must follow the methods in this Section.
- An infusion facility must provide the Department of Agriculture and ISP, through the traceability system (see Section 1000.400), a minimum of seven days’ notice prior to rendering the product unusable and disposing of the product.

The “allowable method” as per the Department of Agriculture to render cannabis plant waste unusable, is by grinding and incorporating the cannabis plant waste with other ground materials so the resulting mixture is at least 50% non-cannabis waste by volume. The applicant has read and understood that in order to use other methods to render cannabis waste unusable, the method must be approved by the Department of Agriculture before implementation. Although the infuser applicant will likely never have any pesticides in the facility, all regulations for use of pesticides and disposal will be followed as per the Illinois Department of Agriculture.

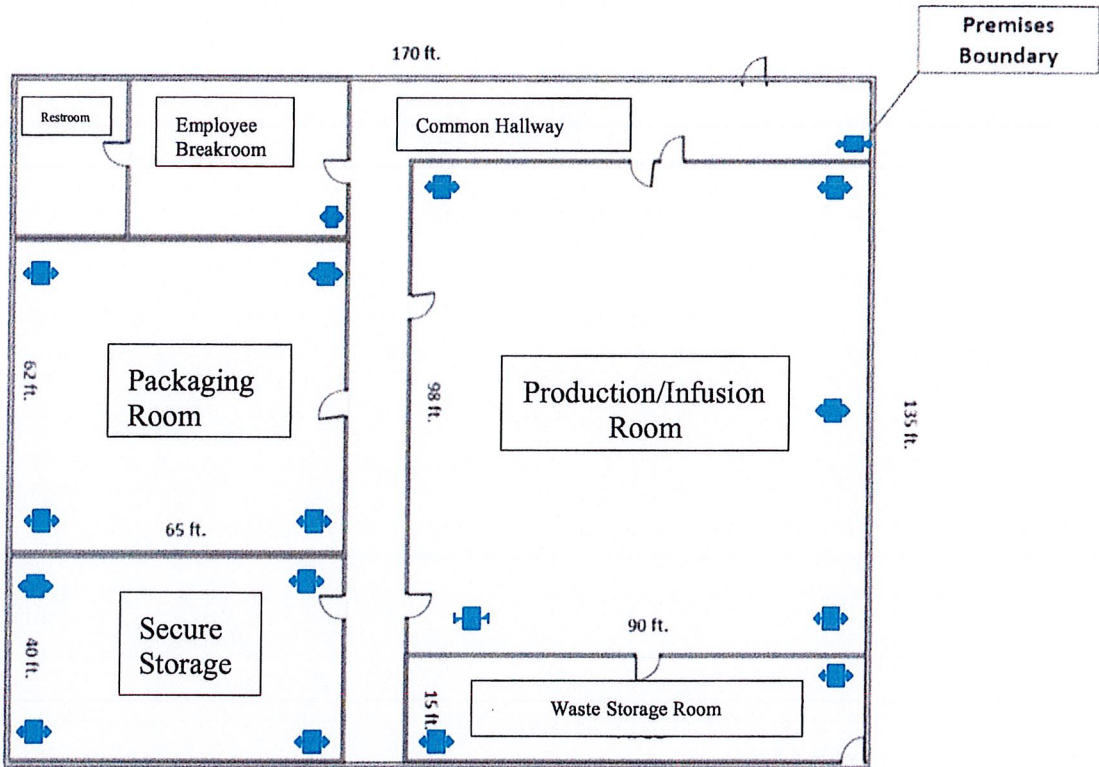
Production Layout

The infuser applicant has provided a layout of what the production area will look like, this shows how the process will be set up, and used for best procedures.




Example of Infuser Floorplan

This example shows what the proposed floorplan may look like. The infuser applicant will take in all considerations for the building the infuser business will be in, and once approved by the local zoning and planning will submit all plans.



Index Key:

Cameras: 

Secured Access Door: 