

Appendix L – Local Zoning Laws

H. JOANNE MASTEN, MAYOR



JOHN TERENCE JAYWORK, ATTORNEY

*Town of Smyrna*

DAVID S. HUGG III, TOWN MANAGER

March 20, 2014

Mr. Fabian Livingston

29 Del. C. Ch. 100 Freedom of Information Act

RE: Proposed Registered Compassion Center at 73 Artisan Drive, Smyrna, Delaware 19977

Dear Mr. Livingston:

On Monday, April 7, 2014, the Town of Smyrna, in accordance with the Smyrna Zoning Ordinance and Chapter 3, Title 22 of the Delaware Code Annotated, will conduct a public hearing in the Council Chambers of the Smyrna Town Hall, 27 S. Market Street Plaza, Smyrna, Delaware.

The purpose of the public hearing will be to discuss a proposed amendment to Appendix A ("Zoning") of the Town Code of the Town of Smyrna by amending Section 5 ("District Regulations"), Subsection 14 ("Industrial/Office/Research Park District" - IORP), to include Registered Compassion Centers and Registered Safety Compliance Facilities as a Conditional Use.

Once the proposed zoning ordinance amendment to allow Registered Compassion Centers and Registered Safety Compliance Facilities as a Conditional Use in the IORP zoning district is approved by Mayor and Council, you will then be able to submit an application to allow a Registered Compassion Center to be permitted as a Conditional Use for 73 Artisan Drive, Smyrna, Delaware 19977 to the Planning and Zoning Commission for their review and recommendation to Mayor and Council for final approval.

If you need additional information or have any questions, please contact me at (302) 389-2320 or [jvinc@smyrna.delaware.gov](mailto:jvinc@smyrna.delaware.gov).

Thank you.

Sincerely,

29 Del. C. Ch. 100 Freedom of Information Act

Janet L. Virc  
Manager  
Planning and Zoning

REGINA A. BROWN • JEFFREY A. FLAIRTY • JOHN L. EMBERT III • ROBERT C. JOHNSON • VALERIE M. WHITE • ANDREA C. RODRIGUEZ  
27 SOUTH MARKET STREET PLAZA • P.O. BOX 307 • SMYRNA, DELAWARE 19977

TOWN MANAGERS OFFICE  
[www.smyrna.delaware.gov](http://www.smyrna.delaware.gov)  
Phone 302-653-3486 - Fax 302-659-4169

Appendix M – BCA Development Letter of Intent

**BCA DEVELOPMENT, LLC**  
**101 PEOPLES DRIVE**  
**NEWARK, DE. 19702**

**302-292-0200**

March 7, 2014

Mr. Fabian Livingston

29 Del. C. Ch. 100 Freedom of Information Act

Re: 73 Artisan Drive  
Smyrna Industrial Park  
Smyrna, DE 19977

Dear Mr. Livingston,

It is our intent to enter into a lease with *Guided Steps Compassion Center* for the building at 73 Artisan Drive located in the Smyrna Industrial Park.

The lease will be for a period of two (2) years with the option of a three (3) year renewal. The space can be occupied with a 30 day notice.

If I can be of further assistance please let me know.

Sincerely,

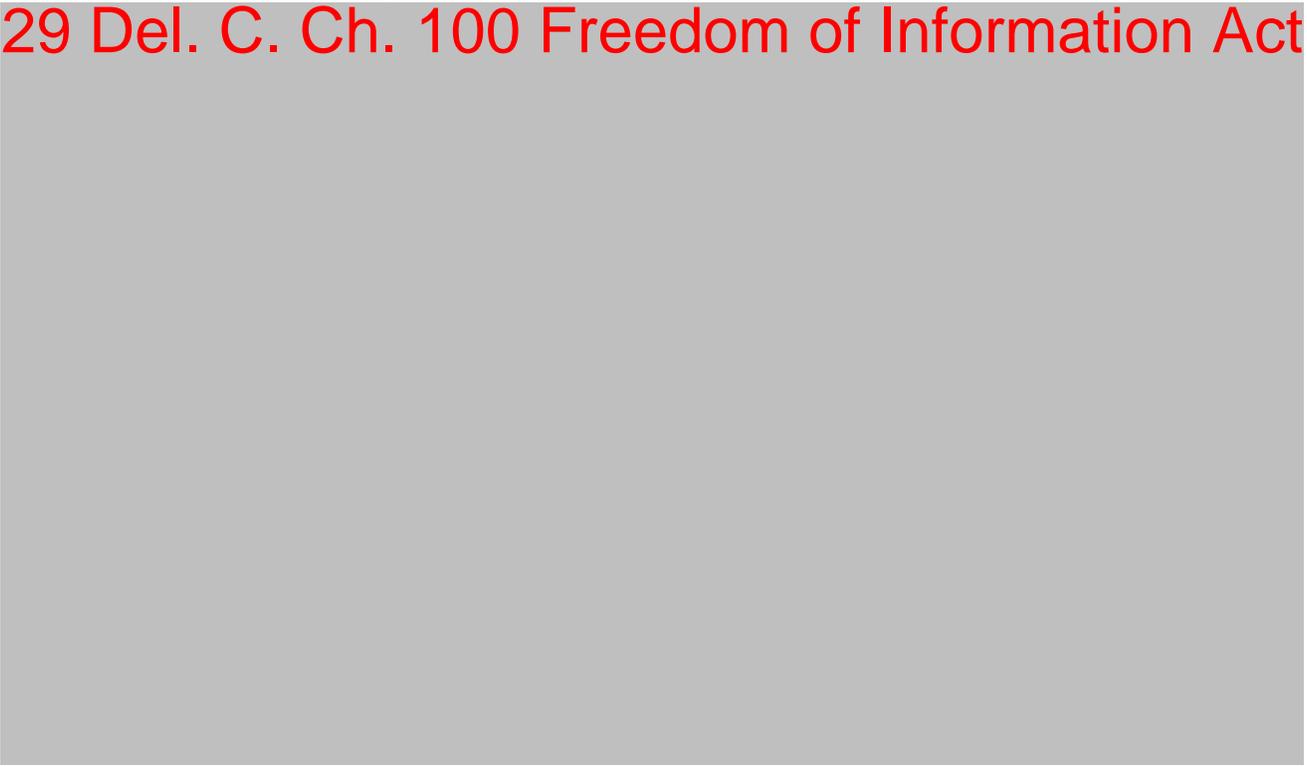
29 Del. C. Ch. 100 Freedom of Information Act

Brian Moriarty  
Partner

b:\GuidedSteps\73Artisan 03.07.14\fb

**Appendix N – Guided Steps Compassion Center Floor Plan**

**29 Del. C. Ch. 100 Freedom of Information Act**



Appendix O – Assurance Media Confidential Security Plan



Assurance  
Media  
Reliable. Secure. Advanced.

590 Century Blvd  
Suite B  
Wilmington De, 19808  
p 302.648.2288  
f 866.246.1153  
[www.assurancemedia.net](http://www.assurancemedia.net)

**Confidential Security Plan**  
**Guided Steps**  
**Compassion**  
**Center**

3/7/2014

Prepared By:

Joe Miroli  
Assurance Media LLC  
590 Century Blvd  
Suite B  
Wilmington DE 19808  
Phone: 302.648.2288  
877.244.8997  
Fax: 866.246.1183  
[jmiroli@assurancemedia.net](mailto:jmiroli@assurancemedia.net)

Enclose Under Separate Cover – Section "E"

In Addition To Section "G" Location and Security of  
Compassion Center

Not for public disclosure.

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## Overview

### Assurance Media LLC,

Has consulted with Guided Steps Compassion Center herein referred to as "Customer" to provide a comprehensive security plan in accordance with the Delaware Division of Health and Social Services Request for Proposal NO HSS 13 056 for "The Registration and Operation of a Medical Marijuana Compassion Center in the State of Delaware"

### About Assurance Media

Assurance Media is an approved State of Delaware electronic access and video surveillance partner currently providing services under GSS Contracts:

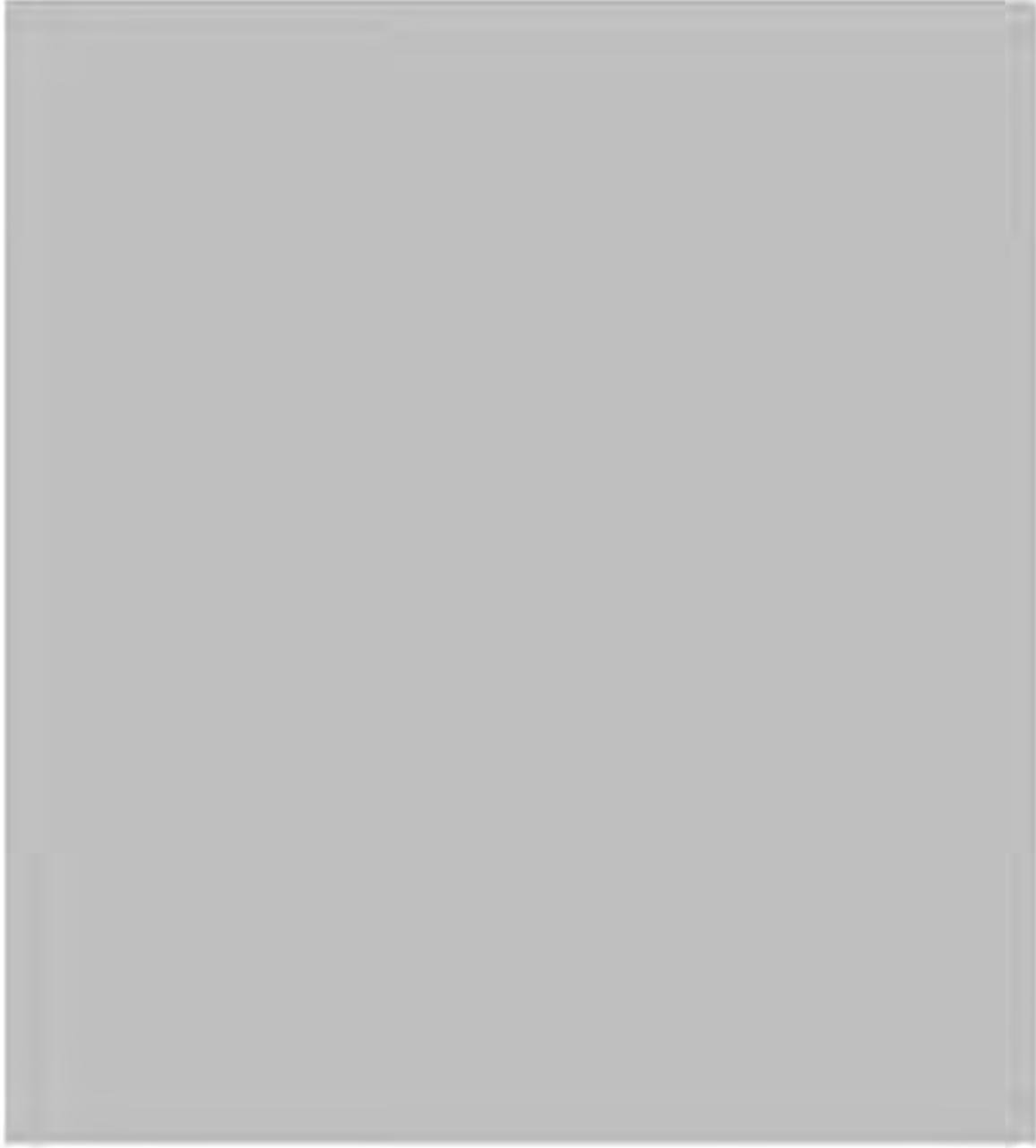
- \*State Of Delaware Contract #GSS09441A-TELECOM\_CBL
- \*State Of Delaware Contract #GSS11584-Audio / Video
- \*State Of Delaware Contract #GSS13599-BLDG\_SECURE

We are a certified Minority Women Business Enterprise M/WBE Certification Number: DE09081637, Located in Wilmington Delaware.

### Confidentiality

The following pages explicitly reference the Customers chosen site and depict actual security devices and locations for strategically placed components of the required security plan and could compromise the effectiveness of such security should this information become public.

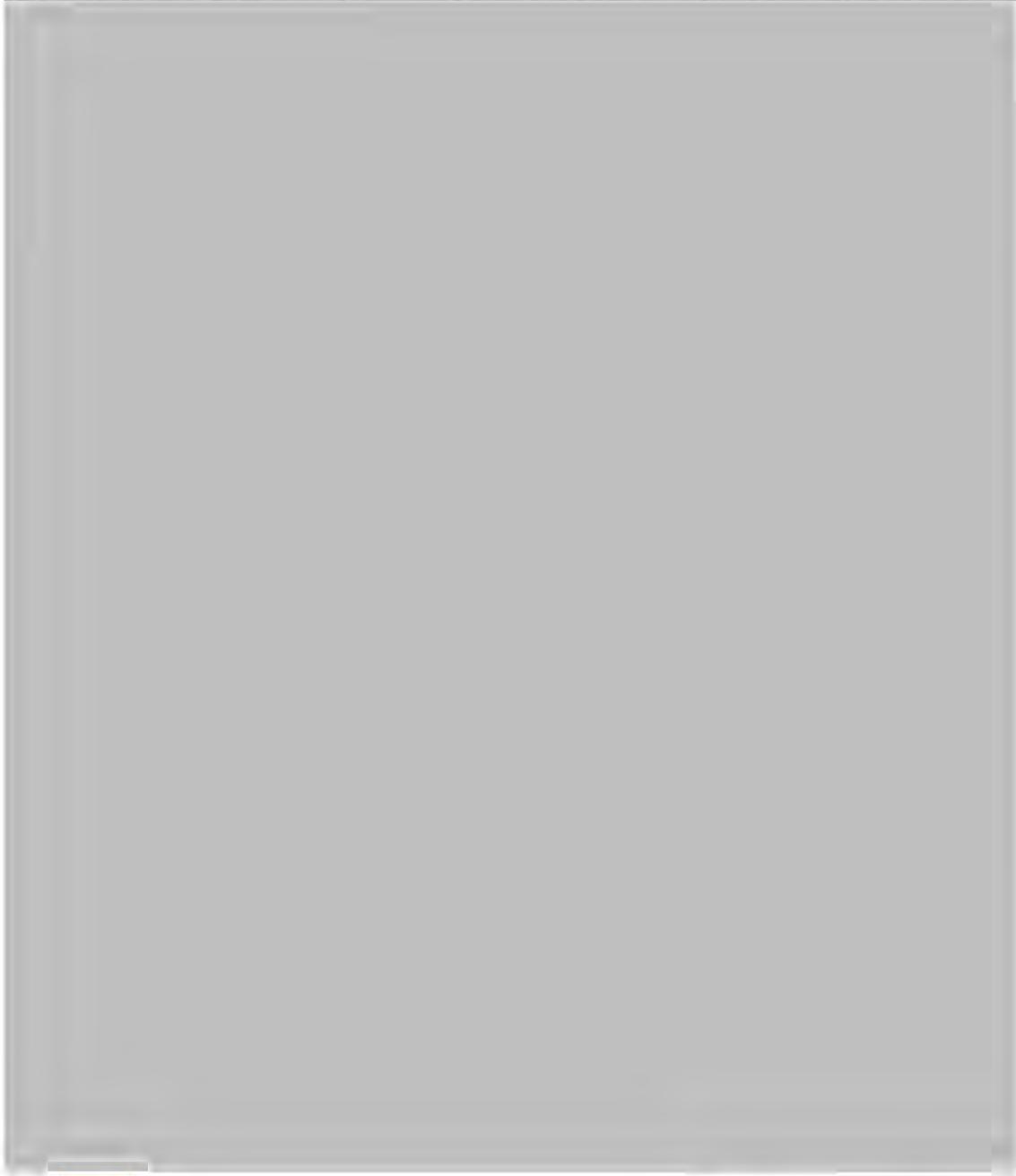
29 Del. C. Ch. 100 Freedom of Information Act



## 29 Del. C. Ch. 100 Freedom of Information Act



## 29 Del. C. Ch. 100 Freedom of Information Act



Appendix P – MJ Freeway



Date: Friday, February 28, 2014

Client Name: Guided Steps Compassion Center

Client Location: Delaware

Client Contact: Ms. Elizabeth Ford / [29 Del. C. Ch. 100 Freedom of Information Act](#) / [29 Del. C. Ch. 100 Freedom of Information Act](#)

Prepared By: Ian James, Account Manger, MJ Freeway Software Solutions

Email: [ian@mjfreeway.com](mailto:ian@mjfreeway.com)

Phone: 888.932.6537 x797

Description: Budgetary quote for one (1) grow location, one (1) processing location, one (1) dispensary location, and peripheral hardware.

**GramTracker™ Elite** software includes: Premium Technical Support, POS System, Patient Validation, Integrating Weighing, Inventory Management, Credit and Debit Card Processing support, Online Ordering, Batch Tracking, State Compliant Labeling, State Compliance Reporting & Integration, Locator Site Integration, Product Menu Population, Wholesale Orders & Tracking, Integrated Test Results, Archive History Function, Multi-Location Support, Patient Rewards, Text & Email Marketing (usage fees apply), Time Clock, and Custom Reporting.

**MixTracker™ Elite** software includes: Premium Technical Support, Integrated Weighing, Inventory Management, Batch Tracking, State Compliant Labeling, State Compliance Reporting & Integration, Wholesale Orders & Tracking, Integrated Test Results, Archive History Function, Ingredient Tracking, Conversion Yield Tracking, and Custom Reporting.

**GrowTracker™ Elite** software includes: Premium Technical Support, Integrated Weighing, Plant Management, Nutrient Tracking, Plant Schedules & Stages, Grow Costing, Employee & Task Scheduling (Q4 2013), Batch Tracking, State Compliant Labeling, State Compliance Reporting & Integration.

**Quickbooks Integration** software provides .iif export of data stored in MJ Freeway directly to Quickbooks (server Quickbooks only). OPTIONAL: All data can be exported out of MJ Freeway via CSV file format and imported where needed.

All modules are fully and seamlessly integrated maintaining continuity over all areas of operation.

MJ Freeway Software Solutions LLC

Ms. Elizabeth Ford. Guided Steps Compassion Center. February 21, 2014

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Page 1 of 5



**Note:** MJ Freeway offers Enterprise Support and Onsite services by request. These optional services are summarized below:

**Enterprise Support** is for large, busy operations with more than six (6) POS stations, more than thirty (30) employees, or over 300 transactions per day requiring fast, efficient, dedicated support operations.

**Enterprise Support** includes: Guaranteed 30 minute support response time. Dedicated Enterprise Support 800 number. Dedicated point of contact with a senior member of our support team. Monthly review of training and support needs with support team contact. After-hours support available with advanced scheduling. Consulting assistance for developing custom reports in our reporting engine. MJ Freeway best practices monthly review and consultation. This unique service provides you with access to one of our operational workflow experts to review how our features and reporting can help you run your business with greater efficiency and success. For example, our team will review your coupon and discount structure, recommend how you can better track the ROI on these discounts, and then work with you to create review and reporting tools to support these best practices. This service is optional. Cost to be quoted individually based on specifics on the operation.

**On-Site Setup and Training** includes: Dedicated support technician on-site to be utilized as desired for overall training, system and peripheral hardware set up, and configuration optimization. Priced on a per day basis, \$1,000 per day plus travel and per diem.

MJ Freeway Software Solutions LLC

Ms. Elizabeth Ford, Guided Steps Compassion Center February 21, 2014

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Page 2 of 5



**SOFTWARE QUOTE\*:**

Item	Quantity	Set Up Fee	Monthly Subscription	Notes
GrowTracker Elite	1	\$949	\$249	Base license for one (1) grow operation.
GramTracker Elite	1	\$475	\$200	Additional license for one (1) dispensary location. 50% off set up, and \$49 off per month when added to base license.
MixTracker Elite	1	\$475	\$200	Additional license for one (1) kitchen location. 50% off set up, and \$49 off per month when added to base license.
Quickbooks Integration	1	\$0	\$49	Not compatible with Quickbooks Online.
<b>Software Total:</b>		<b>\$1,899</b>	<b>\$698</b>	

**POS STATION PERIPHERAL HARDWARE QUOTE\*:**

Item	Quantity	Unit Price	Extended Price	Location	Notes
Label Printer	1	\$265	\$265	POS	Thermal label printer for printing patient labels and bar codes.
Receipt Printer	1	\$246	\$246	POS	For printing patient receipts.
Cash Drawer	1	\$104	\$104	POS	Connects to receipt printer.
Magnetic Card Swiper	1	\$60	\$60	POS	For swiping debit cards.
Barcode Scanner & Stand	1	\$80	\$80	POS	For scanning barcodes.
<b>Peripheral Hardware Sub-Total:</b>			<b>\$755</b>		

The POS Station outlined above assumes a pre-packaged product work flow. If you choose to weigh product on the spot at the point of sale, please add \$913 per station for integrated scales (for 1200 x 0.01 gram capacity NTEP certified scale).

MJ Freeway Software Solutions LLC

Ms. Elizabeth Ford, Guided Steps Compassion Center, February 21, 2014

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Page 3 of 5



**PRE-PACK STATION PERIPHERAL HARDWARE QUOTE\*:**

Item	Quantity	Unit Price	Extended Price	Location	Notes
Label Printer	1	\$265	\$265	Pre-Pack	Thermal label printer for printing bar codes and package labels.
Integrated Scale	1	\$497	\$497	Pre-Pack	Integrated scale for weighing of product. 1200 gram capacity in 0.1 gram increments. NTEP certified.
Barcode Scanner & Stand	1	\$80	\$80	Pre-Pack	For scanning & checking barcodes.
<b>Peripheral Hardware Sub-Total:</b>			<b>\$842</b>		

Multiply Peripheral Hardware Sub-Total by the total number of Pre-Pack stations desired for total cost. If not pre-packing, these stations may be omitted from the budget.

**GROW STATION PERIPHERAL HARDWARE QUOTE\*:**

Item	Quantity	Unit Price	Extended Price	Location	Notes
Label Printer	1	\$360	\$360	Grow	Waterproof thermal label printer for printing bar codes.
High Capacity Integrated Scale	1	\$1,474	\$1,474	Grow	Integrated scale for weighing of product. 6000 gram capacity in 0.1 gram increments. NTEP certified.
Mobile Barcode Scanner	1	\$290	\$290	Grow	Wireless bluetooth barcode scanner.
<b>Peripheral Hardware Sub-Total:</b>			<b>\$2,124</b>		

Grow peripheral hardware is challenging to scope in this planning stage of the process. A detailed and formal quote can be provided as needs are scoped and defined. Anticipate issuing a barcode scanner and label printer to each mobile grow station, and multiply the cost for these items by the total number of stations desired (\$650 per station). One high capacity scale should be sufficient for early stages.



**Additional Hardware Requirements:** This quote does not cover computers, tablets, network, or other systems needed to access the MJ Freeway system. Please contact me to review additional hardware requirements. Secure internet access and a minimum of four (4) USB ports are required (six (6) USB ports are recommended).

Thank you for your interest in MJ Freeway Software Solutions. We strive to exceed your expectations as your preferred partner for business management solutions in the marijuana industry. We hope you will join our team of satisfied customers. Please visit our website at <http://www.mjfreeway.com/order> to place your order and get started, or call me personally at 888.932.6537 x797 if you need additional information.

Sincerely,

Ian

Ian R. James  
Account Manger  
MJ Freeway Software Solutions  
Email: [ian@mjfreeway.com](mailto:ian@mjfreeway.com)  
Phone: 888.932.6537 x797

- Prices shall be valid for a period of ninety (90) days from the date quoted.



**Introduction**

MJ Freeway Software Solutions was founded in 2010 to cater specifically to the needs of the medical marijuana industry. Developed from the ground up to accommodate the emerging needs of our clients, MJ Freeway provides the premier business management platform in the industry. MJ Freeway is proud to be privately held, which enables us to cater solely to the needs of our clients, and our original founders and developers remain actively involved in day to day operations.

MJ Freeway's GramTracker™ and GrowTracker™ software suite provides a robust set of administrative tools allowing a business operator full visibility into and control over of all facets of operations. With complete system integration, MJ Freeway stands uniquely positioned to address the most challenging of regulatory compliance requirements. Some examples of more sweeping and precise regulatory requirements we have accommodated will be illustrated below in this document. MJ Freeway guarantees the tracking and reporting functionality our customers need to remain compliant with all existing and emerging regulatory requirements for tracking cannabis.

**Examples on regulatory compliance provided by MJ Freeway Software Solutions**

*Labeling*

The state of Arizona requires a very specific custom label. Compared to our standard label, pictured here, Arizona requires not only similar product information, but also specifically-prescribed typeset and nomenclature. We happily worked with the state to ensure our labels matched Arizona's exacting requirements, allowing an MJ Freeway subscriber to be the first licensed medical marijuana dispensary to open in the state.

**Standard Label**

215 Meds Collectives  
888-932-6537 08/15/2013  
87  
**Blue Dream Pre-Packaged**  
1.00 GR  
*Custom 35 Character Disclaimer*

**Arizona Label**

215 Meds Collectives 08/15/2013  
888-932-6537  
Disp ID: 432432432  
Producer: CG  
Patent: 87  
Reg# MWR12346  
**Blue Dream Pre-Packaged**  
  
**Blue Dream Pre-Packaged**  
1.00 GR Net MW Weight: 1.00 GR  
Batch ID: BD82213  
Lic# CG, 432432432  
  
Chemical additives: No chemical additives  
  
AZ DEPT OF HEALTH SERVICES  
*WARNING: Marijuana use can be addictive and can impair an individual's ability to drive a motor vehicle or operate heavy machinery. Marijuana smoke contains carcinogens and can lead to an increased risk for cancer, tachycardia, hypertension, heart attack, and lung infection. KEEP OUT OF REACH OF CHILDREN.*



*Tracking Plant Counts*

Some states, including Colorado and Maine, designate a maximum number of plants a caregiver or dispensary may cultivate at any given time per patient. MJ Freeway's GramTracker intelligently tracks the number of patient plants by caregiver assignment and can allow for manual override of standard state-plant limitations, if so dictated by a prescribing physician, and as may be allowed by state law. GrowTracker tracks all plants in all stages, allowing growers to ensure a legal number of plants are cultivated, and providing warning notification if limitations are exceeded.

**Plants listed by MMJ card number and caregiver in GrowTracker.**

<input type="checkbox"/>	<a href="#">BD314008</a>	982897423-23 (3)	215 Meds Collectives
<input type="checkbox"/>	<a href="#">BD314009</a>	MMR54321 (67)	215 Meds Collectives
<input type="checkbox"/>	<a href="#">BD314010</a>	MMR54321 (67)	215 Meds Collectives
<input type="checkbox"/>	<a href="#">BD314011</a>	MMR12346 (13)	215 Meds Collectives
<input type="checkbox"/>	<a href="#">BD314012</a>	MMR54321 (67)	215 Meds Collectives

**A GrowTracker plant count report providing a valuable warning**

Stage	Plants at Selected Locations	Plants at Other Locations	Total Plants	Max Allowed
Seedling	31	0	31	
Clone	39	0	39	
Veg	5	0	5	50
Flower or Later	11	0	11	30
<b>TOTAL</b>	<b>89</b>	<b>0</b>	<b>89</b>	<b>72</b>

*Setting Sales Limits*

Many states, including Arizona and Colorado, dictate a maximum amount of medicated product which may be sold to a patient within a given period of time. MJ Freeway's GramTracker allows a business operator to set sales limits, and the system will actively block any sales exceeding these limitations. If the jurisdiction in which you operate mandates use of a state database to verify and/or track patient validity and purchases, MJ Freeway will eagerly create an integration with any such state system, should the state create the necessary framework.

**GramTracker preventing sales beyond legal sales limits**

If current order is completed, the patient will exceed the medicated limit by 0.50 OZ

Enter CL to clear.

Order cannot be completed. It causes the patient to exceed the medicated limit by 0.50 OZ

Enter CL to clear.



**Batch Tracking**

In the wake of Colorado's success in the medical cannabis industry, many states, including Arizona and many states on the East Coast, mandate an inventory tracking methodology that assigns lot or batch numbers to like collections of medicated product. MJ Freeway software is designed with this model of tracking in mind, allowing an organization to track the chain of custody of medicated product throughout its entire life cycle, producing a complete history of the medication from seed to sale.

**State Specific Reporting**

Some states require very specific reporting or data accessibility to ensure compliance. Most notably, the state of Colorado requires a number of specific reports, and New Jersey requires access to a dispensary's database. In cases such as these, MJ Freeway has proactively contacted appropriate governing authorities to create the desired reports and to provide database access that guarantees access only to view necessary information without any ability to edit records. In the event new reporting requirements emerge, MJ Freeway's powerful reporting engine guarantees the ability to craft custom reports from information in the system database.

A sample compliance report generated within GramTracker

MEDICAL MARIJUANA ENFORCEMENT DIVISION 30% COMPLIANCE REPORT For the 12 Months Ending Aug 2013													
Business License Name:	215 Mads Collectives												
Business License Number:	452432432												
<small>INSTRUCTIONS: This report aggregates data from Forms 1010, 1070 and 1100 to show compliance with the 30% wholesale requirement and the two ounce limit per patient. Using 12-month averages, wholesale dispensers as a percentage of inventory must be under 30% in order to be compliant. In addition, monthly average inventory cannot exceed two ounces per patient. The 30% requirement applies only to MADA 810 licenses as per the average on-hand inventory.</small>													
Inventory Information (grams)	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Avg
Average Daily Inventory On-Hand (From Form 1100)	114,221.00	115,434.00	115,538.00	122,528.00	122,200.88	114,916.00	54,281.37	19,952.34	22,291.51	23,528.96	24,365.00	777,223.53	133,028.08
Wholesale Sales (From Form 1070)	0.00	112.00	152.00	0.00	119.00	0.00	0.00	0.00	75.00	330.00	95.00	0.00	68.96
Wholesale Purchases (From Form 1070)	0.00	45.00	0.00	163.00	113.00	0.00	0.00	887.00	1,828.00	0.00	887.00	0.00	430.68
Wholesale Sales as % of On-Hand Inventory	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%
Wholesale Purchases as % of On-Hand Inventory	0%	0%	0%	0%	0%	0%	0%	4%	30%	0%	2%	0%	0%
Inventory Measures (Scale Values)													
Total Number of Inventory Patients (From Form 1010)	6	6	8	3	9	9	7	8	8	8	5	5	76
Maximum On-Hand Inventory (ounces)	44.00	60.00	60.00	60.00	20.00	68.00	14.00	14.00	44.00	44.00	36.00	36.00	76
Maximum On-Hand Inventory (grams)	1,247.41	1,701.60	1,701.60	1,701.60	887.51	1,987.82	358.50	358.50	1,247.41	1,247.41	1,028.61	1,028.61	76
Average Daily Inventory On-Hand (From Form 1100)	114,221.00	115,434.00	115,538.00	122,528.00	122,200.88	114,916.00	54,281.37	19,952.34	22,291.51	23,528.96	24,365.00	777,223.53	133,028.08
On-Hand Inventory Over (Short) Maximum	112,974.18	115,122.00	114,154.21	120,927.00	121,113.88	112,966.00	53,554.46	19,165.44	22,175.10	23,291.46	23,548.42	756,222.92	131



*Card Tracking*

Most states require that dispensaries track whether a patient has a valid license card. Taking this a step further, MJ Freeway's GramTracker additionally makes clear when checking in or performing a sale whether a patient's card is valid, nearing, or past expiration. This will allow a dispensary to ensure both their patients' validity and ability to make a legally compliant purchase as well as to advise patients nearing expiration that they need to look into renewal and updating their patient records.

The POS screen alerts employees to an expired card with a bold red alert.



*Transaction History*

While MJ Freeway keeps detailed records of inventory movement, it also allows users to correct errors in data entry through manual adjustments. In doing so, however, the system also records and tracks any changes made to the inventory record. Users can then view any of these adjustments, and while recording them, can also record any relevant notes to explain why the adjustment was made. In doing so, GramTracker allows users to maintain a current and accurate inventory while preserving the benefit of a diligently and thoroughly tracked database.

A transaction report contains a chronologically itemized list of any changes made to your inventory stock levels, allowing you to see who made a change, when, and why.

Type	Date	Amount	New Level	Pkg ID	New Pkg Level	Cost	User	Description
MANUAL	Sep 04, 2013 04:59 pm	-0.50 GR	359,581.08 GR	27	48.70 GR		da	0.5 GR manually subtracted from Blueberry - BULK by da on Sep 04, 2013 04:59 pm. Reason: Moisture Loss

MJ Freeway Software Solutions stands ready to meet the compliance requirements for marijuana tracking in any state where either medical or adult-use marijuana regulations exist. Upon passage of finalized rules in any state, MJ Freeway creates a detailed Application Support Package, addressing each rule related to marijuana tracking and describing how MJ Freeway complies. This Application Support Package is provided to MJ Freeway's clients and prospects to assist them in the preparation of their state application. To receive an Application Support Package, or for additional information, please contact us directly at 888.932.6537 x2 or sales@mjfreeway.com.



*Track every gram*



### Track Every Gram from Seed to Sale

Available Worldwide, currently in **English, Spanish, and French.**

Use each product independently, or combine them for an integrated **Seed to Sale Business Solution.**

#### Product Suite

**GrowTracker™** for Producers and Cultivators

**MixTracker™** for Processors and Infused Product Manufacturers

**GramTracker™** for Collectives, Clubs, Dispensaries, and Retailers

#### The Power of MJ Freeway™

- Executive Dashboard for robust Multiple Location Functionality
- "One Stop Shop" for all your Hardware and Software needs
- Mobile-Enabled Software
- Customizable Reports
- Ad-hoc Reporting
- Timeclock for Employees
- Quickbooks Integration
- Premium Unlimited Remote Technical Support
- Online Customer and Patient Scheduling
- Test Results Integration
- Real Time Locater Site Menu Integration
- Delivery Optimized
- State-System Integration
- State and Federal Compliance Guaranteed

Email us to learn more at [info@mjfreeway.com](mailto:info@mjfreeway.com)

MJ Freeway™ was founded in 2010 by a team of career software and IT professionals.

The entire product suite is designed and built from the ground-up specifically for the cannabis industry.

Featured in Fortune Magazine, USA Today, CNN Money, MSNBC, IT World, and PC World.



*Track every gram*

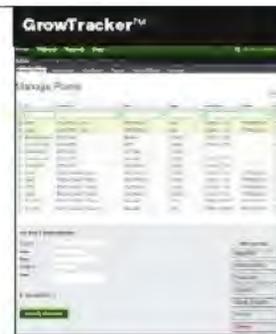
WHAT OUR CUSTOMERS ARE SAYING

"I love them, my staff loves them, and I don't know where we would be, or how I would run my business without MJ Freeway and their awesome support team."

—Gabe Gaston, The Wellness Shop

**GrowTracker™**

- Manage every cultivation detail
- Intuitive tools for **plant management, nutrients, cultivation costs, and scheduling**
- Effortlessly handle **harvest, packaging, and distribution**
- **Go mobile** throughout your cultivation facility with a phone or tablet and a wireless scanner



**MixTracker™**

- Maximize your output and efficiency
- Track **yields**
- Track extraction ratios
- Intelligently **combine products** to deliver value and quality
- Built-in **wholesale sales**



**GramTracker™**

- Maximize your retail business operations
- Powerful **inventory tracking** tools
- Built-in **CRM** follows **HIPAA** patient privacy guidelines
- **Touch-screen** and **mobile** enabled
- Text and email **marketing**
- Loyalty program
- **Online ordering** with real-time inventory





Call 888-932-6537

## Online Ordering and Delivery Services

### Online Ordering

- Online ordering page with your company name and logo
- Embed ordering page on your website, or we can provide online ordering as a standalone site for you
- Save time in your store -- patients can submit an order online, walk-in, or phone and pick up at your location
- For delivery service (where available) -- patients can directly enter their order and address to schedule a delivery
- Transfer orders between locations
- Choose which products to display online
- Automatically remove products based on inventory levels
- Tied to your real-time inventory -- Set inventory buffer levels and warning reminders.
- Only hosted software that supports automated online orders

### Delivery Support (Where Available)

- Supports mobile dispensaries and store-order-generated delivery
- Patients can submit an order online, walk-in, or phone
- Generates confirmation receipts by email or text to patient
- Patients can request a delivery time
- Assigns inventory to an unlimited number of drivers
- Easily transfer inventory between locations and drivers
- Track deliveries completed and still in process
- Validates patient records and accepts completed orders and payments at the delivery site
- Mobile dispensaries can easily transfer inventory from orders and back into store inventory
- Orders can be packed at a location and system inventory adjusted for outstanding delivery
- Roaming dispensaries can receive a request for an open delivery order and schedule a time
- Mobile dispensaries receive an automated email or text when an order is placed
- Sales efficiency reporting monitors driver, average time to order completion and number of on-time or late orders
- Reporting can be sorted by delivery order source: online, phone, walk in



Online Ordering Patient Order Signup



Online Ordering Standalone



Online Delivery Order



Delivery Efficiency Report

www.MJFreeway.com | Call 877.932.6537

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## Appendix Q – Sample Welcome Packet



### Welcome to Guided Steps Compassion Center!

We are very happy and excited to have you as a new member of our family! We appreciate your trust in us to create a partnership that will support you in accomplishing your health and wellness goals. We are confident you will be very satisfied with the services we offer. We will strive to meet all your health care needs and provide you the highest quality care. Your satisfaction is our goal!

#### Hours of Operation

Please note our hours of operation are as follows:

Monday – Friday: 9:00AM – 8:00PM  
Saturday – TBD  
Sunday – TBD

#### Appointments

Visits to Guided Steps Compassion Center are by appointment only, which may be made in the following manners:

- Online at our website: [www.<insert address>](http://www.<insert address>)
- Contacting us at: (302)653-####

Please contact us within 24 hours if your appointment needs to be rescheduled; this will allow us to use the time reserved for other patients in need. If you arrive late, your appointment may have to be rescheduled.

#### Sliding Scale Program

Guided Steps Compassion Center offers a Sliding Scale Donation Program based on income and family size, for patients who are unable to afford suggested donation amounts. You will be asked to complete an application and provide our office with income verification (two recent paystubs), address verification (utility bill) and identification. You must be prepared to pay a sliding donation amount which will be determined at the time of visit.

#### Other Services

Guided Steps Compassion Center offers the following services at no charge to our patients:

- Chiropractic
- Massage Therapy
- Acupuncture
- Reflexology
- Reiki
- Jin Shin Jyutsu
- Health Coach Counseling
- Senior Support Program
- Patient Group Support Program
- Patient Substance Abuse Support Program

The information enclosed will help you make the most of our services. If you have any questions, please do not hesitate to contact us. When you call, please have your Registry ID Card Number readily available so that we may expedite your request.

As your needs change, we will be happy to help you evaluate those needs and offer you services that will help you achieve your new goals.

Warmly,  
Guided Steps Compassion Center Staff

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



### Patient/Caregiver Code of Conduct Agreement

We, at Guided Steps Compassion Center, are extremely grateful our neighborhood accepts and welcomes us! Therefore, we ask your cooperation to keep our organization in good standing and repute. Below are the guidelines for Patient/Caregiver Code of Conduct.

In order to enter the facility, you must be at least 21 years of age with a valid Delaware Driver's License or valid Delaware State issued ID card.

Please have your medical marijuana Registry ID Card and valid State of Delaware ID ready for presentation to the Security Guard stationed in the main entrance.

You must have a current valid doctor's recommendation for medical marijuana; recommendations must be renewed on an annual basis.

Do not use or consume medicine in the building, in the parking lot, or in the surrounding area.

Cell phones or cameras are not permitted inside the facility. If these items are in your possession upon check-in with the Security Guard, they will be confiscated and held until your departure from the premises.

Please do not ask for any information other than store hours over the phone. If you have questions, please ask them in person at the facility.

You may not sell or redistribute your medicine to others.

Please be very discrete and place your medicine out of sight before leaving the facility. Do not display or discuss your medicine in the surrounding neighborhood.

Keep all medications locked up in a safe place.

Do not engage in loud, boisterous, or disruptive behavior in or near the facility.

All patients/caregivers should arrive and leave alone.

No backpacks are allowed in the facility.

No money is to be exchanged inside or outside of the facility between other patients or caregivers.

No loitering around the facility.

Patients/Caregivers are allowed only one visit a day, which is via appointment only.

Use of marijuana while driving may result in charges of driving under the influence. Do not drive or operate heavy machinery while using marijuana.

Respect and show courtesy towards all staff, patients, caregivers, and our neighbors.

I agree to these rules and I understand that violations of these rules will result in immediate termination of my privileges at Guided Steps Compassion Center.

Name (please print): \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



**Guided Steps Compassion Center  
Member Discounts and Services**

Guided Steps Compassion Center offers the following discounts and services at no cost to our members:

**Compassionate Care Discounts**

**State, Federal, and Military Disability Patients**

- 25% discount twice per month

**Cancer and AIDS Compassionate Care and Access Program**

- 25% discount twice per month

**Terminal patients with less than 6 months to live**

- Free medicine to patients within legal dispensing guidelines and terms recommendation

**Sliding Sale/Free Medicine Services**

- Seriously ill patients who cannot afford medical cannabis

**Compassionate Care Jar Program**

- Money donations by members and staff match by Guided Steps, on a temporary, as needed basis.
- Guided Steps will seek, on an individual basis, to match the patient's contribution so that the patient can purchase needed medical cannabis; and
- No one in need is turned away. Guided Steps will seek, on an individual basis, to provide free medicine at the time of the patient's visit (within the legal dispensing guidelines and terms of recommendation) until he or she is able to purchase it in the future.

**General Discounts**

- 10% Senior Citizen discount (patients 65 years of age or older); and
- Member patients who cannot afford medication (based on total income below 200% of the Federal Poverty Level Guidelines).

**Compassionate Courier Service**

Patients who are able to administer their own medication (not requiring assistance from a designated caregiver) and have no transportation to the facility to obtain their medication will have the option of calling in for their medication to be transported securely and safely to their residence.

**Support Programs**

**Senior Support Program**

This program is specifically for seniors who are new to medical cannabis and have family who are not supportive of it. The goal of this program is for a support counselor, as well as other seniors, to share experiences and stories etc. in an effort to encourage positive thoughts and energy for the mind, body, and spirit (conducted by experienced and licensed counselor).

**Patient Group Support Program**

This program is for patients who do not have the support of their family for the use of medical cannabis. The goal of this program is for a support counselor, as well as other patients, to share experiences and stories etc. in an effort to encourage positive thoughts and energy for the mind, body, and spirit.

Guided Steps Compassion Center  
Member Discounts and Services

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**Patient Substance Abuse Support Program**

This program is for patients who feel comfortable to discuss and face their addictions. The goal of this program is to discuss ways the use of medical cannabis, positive surroundings, and positive thinking can help one overcome addictions *(conducted by experienced and licensed counselor)*.

**Wellness Programs**

**Chiropractic Care**

Chiropractic is a method of natural healing most chosen by those seeking complementary / alternative health care for acute and chronic conditions. Chiropractic focuses on maintaining your health naturally to help your body resist disease, rather than simply treating the symptoms of disease.

**Massage Therapy**

Massage therapy is more than relaxing me-time. Studies continue to prove the physical and emotional benefits of even a single massage therapy session. Some of the benefits of massage therapy include:

- Relieves stress
- Encourages relaxation
- Improves posture
- Improves circulation
- Lowers blood pressure
- Relaxes muscles
- Improves flexibility and range of motion
- Promotes deeper and easier breathing
- Strengthens the immune system
- Enhances post-operative rehabilitation
- Improves rehabilitation after injury

**Acupuncture**

Acupuncture is one of the main forms of treatment in traditional Chinese medicine. It involves the use of sharp, thin needles that are inserted in the body at very specific points. This process is believed to adjust and alter the body's energy flow into healthier patterns, and is used to treat a wide variety of illnesses and health conditions.

**Reflexology**

Reflexology is a therapeutic method of relieving pain by stimulating predefined pressure points on the feet and hands. This controlled pressure alleviates the source of the discomfort. In the absence of any particular malady or abnormality, reflexology may be as effective for promoting good health and for preventing illness as it may be for relieving symptoms of stress, injury, and illness.

**Reiki**

Reiki is a form of therapy that uses simple hands-on, no-touch, and visualization techniques, with the goal of improving the flow of life energy in a person. Reiki (pronounced *ray-key*) means "universal life energy" in Japanese, and Reiki practitioners are trained to detect and alleviate problems of energy flow on the physical, emotional, and spiritual level. Reiki touch therapy is used in much the same way to achieve similar effects that traditional massage therapy is used—to relieve stress and pain, and to improve the symptoms of various health conditions. Some of the benefits of Reiki include:

- Creates deep relaxation and aids the body to release stress and tension
- Accelerates the body's self-healing abilities
- Aids better sleep
- Reduces blood pressure

Guided Steps Compassion Center  
Member Discounts and Services

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- Can help with acute (injuries) and chronic problems (asthma, eczema, headaches, etc.) and aides the breaking of addictions
- Helps relieve pain
- Removes energy blockages, adjusts the energy flow of the endocrine system bringing the body into balance and harmony
- Assists the body in cleaning itself from toxins
- Reduces some of the side effects of drugs and helps the body to recover from drug therapy after surgery and chemotherapy
- Supports the immune system
- Increases vitality and postpones the aging process
- Raises the vibrational frequency of the body
- Helps spiritual growth and emotional clearing

**Jin Shin Jyutsu**

Jin Shin Jyutsu is a Japanese form of acupressure based on gentle touching and cradling of the body rather than massage; the practitioner identifies zones of compromised flow of energy chi (life force) by pulse diagnosis and then attempts to harmonize the body, mind and spirit, simultaneously touching a combination of 2 of 26 "safety energy locks" located along the body's energy pathways so as to redirect the patient's intrinsic life forces to unblock the flow of energy. Some of the benefits of Jin Shin Jyutsu include:

- Alleviates low-back pain and improves range of motion
- Enhances immunity by stimulating lymph flow—the body's natural defense system
- Helps cancer patients with symptoms from chemotherapy
- Improves the condition of the body's largest organ—the skin
- Increases joint flexibility
- Lessens depression and anxiety
- Promotes regeneration
- Improving circulation and breathing
- Reduces post-surgery adhesions and swelling
- Reduces spasms and cramping
- Relaxes and soften tired, overused muscles,
- Relieves migraine pain

**Health Coach Counseling**

A Health Coach will guide and mentor patients, empowering them to take responsibility for their own health, and support them to implement and sustain lifestyle and behavior changes that will contribute to the achievement of their personal wellness goals. Some common areas a Health Coach will help a patient to focus include:

- Stress management
- Weight management
- Food cravings
- Digestion
- Sleep
- Energy

A Health Coach does not diagnose, treat, or take the place of any medical practitioner; rather serves as the missing link (the patient guide) that helps develop strategies to enact real, lasting lifestyle changes that address not only the diagnostic label (i.e. pre-diabetic), but also serves to enhance the patient's overall wellness.



<Placeholder>

**DHSS List of Medical Marijuana  
Frequently Asked Questions  
(FAQs)**

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



Marijuana Policy Project  
236 Massachusetts Ave. NE, Suite 400  
Washington, DC 20002  
p: (202) 462-5747 • f: (202) 232-0442  
info@mpp.org • www.mpp.org

*"We change laws."*

### Federal Enforcement Policy on State Marijuana Laws

#### Current Policy

In a Department of Justice memorandum<sup>1</sup> issued to federal prosecutors on August 29, 2013, Deputy Attorney General James Cole outlined federal law enforcement policy with respect to state laws, which allow citizens access to marijuana — whether for medical or adult use — as well as businesses and individuals complying with those laws.

The cornerstone of this policy is its emphasis on state regulation. According to the memo, the federal government will focus its efforts on eight enforcement priorities and rely on state law enforcement authorities to manage areas that are not federal priorities. Deputy Attorney General Cole made clear that to ensure U.S. government's concerns are addressed, the department expects states to implement a strong regulatory framework. The memo states, "The Department's guidance in this memorandum rests on its expectation that state and local governments that have enacted laws authorizing marijuana-related conduct will implement strong and effective regulatory and enforcement systems that will address the threat those state laws could pose to public safety, public health, and other law enforcement interests."

The eight areas of particular concern to the department are:

1. Preventing the distribution of marijuana to minors;
2. Preventing revenue from the sale of marijuana from going to criminal enterprises, gangs, and cartels;
3. Preventing the diversion of marijuana from states where it is legal under state law in some form from going to other states;
4. Preventing state-authorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity;
5. Preventing violence and the use of firearms in the cultivation and use of marijuana;
6. Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana use;
7. Preventing the growing of marijuana on public lands and the attendant public safety and environmental dangers posed by marijuana production on public lands; and
8. Preventing marijuana possession or use on federal property.

#### Previous Policy Statements

The August 2013 memo was written in response to voter initiatives in Washington and Colorado that allow regulated adult access to marijuana.<sup>2</sup> The purpose of the memo was to update federal policy as it appeared in two previous memos issued by the department in 2009 and 2011.

During President Obama's first presidential campaign in 2008, he made several statements<sup>3,4</sup> articulating his belief that federal law enforcement priorities should not be directed toward

<sup>1</sup> James M. Cole, Guidance Regarding Marijuana Enforcement, United States Department of Justice, Office of the Deputy Attorney General, August 29, 2013.

<http://www.justice.gov/iso/opa/resources/3052013829132756857467.pdf>

<sup>2</sup> Bly, Laura S. "Colorado, Washington OK Recreational Marijuana Use," *USA Today*, November 7, 2012.

<http://www.usatoday.com/story/dispatches/2012/11/07/colorado-washington-legalize-recreational-marijuana-tourism/1689269/>

<sup>3</sup> Tierney, John. "Obama to Stop Raids on Marijuana Clinics," *New York Times*, May 14, 2008.

<http://tierneylab.blogs.nytimes.com/2008/05/14/obama-to-stop-raids-on-marijuana-clinics/>

<sup>4</sup> "Obama: Decriminalize Pot," *Washington Post*, January 31, 2008.

<http://www.washingtontimes.com/news/2008/jan/31/obama-decriminalize-pot/>

enforcement of federal marijuana laws in states that allow for the use of medical marijuana. In October 2009, the department issued a memorandum,<sup>5</sup> now referred to as the "Ogden memo," that memorialized that view. It established department policy that it was unlikely that medical marijuana patients and their caregivers who acted in clear and unambiguous compliance with state law would be the targets of federal prosecution.<sup>6</sup>

In a subsequent memo issued in 2011,<sup>7</sup> the department qualified some of its previous guidance for prosecutors in the Ogden memo by stating that the policy statements in the Ogden memo did not apply to business enterprises. In the August 2013 memo, however, this policy limitation no longer applies in a well-regulated environment. Even large-scale, for-profit businesses are not supposed to be targeted if they do not place department interests at risk.

#### **Policy in Practice**

While some were surprised the department continued medical marijuana prosecutions following the Ogden memo, the new Cole memo is essentially consistent with what department policy has been in practice throughout the Obama administration. The vast majority of federal prosecutions took place in states that did not provide clear and robust regulations. California and Montana in particular bore the brunt of the federal law enforcement activity due to their lack of a regulatory framework for marijuana providers. By contrast, states with strong regulations for businesses saw little or no federal law enforcement activity, including Arizona, Colorado, Maine, New Jersey, New Mexico, Rhode Island, and Vermont. Federal enforcement in states with clear regulations has generally been limited to those breaking the law and making dispensaries locate further away from schools.

#### **Federal Law and Preemption**

It is important to note that all three policy memos have been clear that they do not change federal law. Possession, cultivation, and sale of marijuana remain illegal under the federal Controlled Substances Act, and states may not prevent the federal government from enforcing its own laws. Nonetheless, both federal and state governments establish their own laws under our federalist system of government, and state laws are not preempted unless they compel citizens to break federal law. The federal government has not argued that any state laws regulating marijuana violate this principle, and in some cases where third parties have made the case, they have typically lost.<sup>8</sup>

#### **The Laboratories of Democracy**

It is clear that the federal government has taken a step back from strictly enforcing its own laws related to the cultivation, possession, and sale of marijuana and is encouraging those states which allow marijuana-related activities to adopt strong regulatory frameworks. Whether it's to free up law enforcement to pursue serious criminals, lighten the burden on the courts, take marijuana sales out of the hands of criminals, or increase state budgets with additional revenue, federal marijuana policy gives state legislatures and voters the opportunity to implement laws that make the most sense for their own citizens.

<sup>5</sup> David Ogden, Memorandum for Selected United States Attorneys: Investigations and Prosecutions in States Authorizing the Medical Use of Marijuana, United States Department of Justice, Office of the Deputy Attorney General. October 19, 2009. <http://blogs.justice.gov/main/archives/192>

<sup>6</sup> Some raids did continue, particularly in states such as California, which lacked substantive regulations for business. See: Gibel, Bryan. "Feds Continue Raids on Medical Pot in California," *Mission Local*, November 3, 2009. <http://missionlocal.org/2009/11/feds-to-continue-raids-on-medical-pot-in-california/>

<sup>7</sup> James M. Cole, Memorandum for United States Attorneys: Guidance Regarding the Ogden Memo in Jurisdictions Seeking to Authorize Marijuana for Medical Use, United States Department of Justice, Office of the Deputy Attorney General. June 29, 2011. <http://www.justice.gov/oip/docs/dag-guidance-2011-for-medical-marijuana-use.pdf>

<sup>8</sup> See: *White Mountain Health Center Inc. v. County of Maricopa*, CV-2012-053585, (December 3, 2012), and *Arizona v. United States*, Case No. CV 11-1072-PHX-SRB (D.C. Ariz. January 4, 2012).



U.S. Department of Justice

Office of the Deputy Attorney General

The Deputy Attorney General

Washington, D.C. 20530

August 29, 2013

MEMORANDUM FOR ALL UNITED STATES ATTORNEYS

FROM: James M. Cole   
Deputy Attorney General

SUBJECT: Guidance Regarding Marijuana Enforcement

In October 2009 and June 2011, the Department issued guidance to federal prosecutors concerning marijuana enforcement under the Controlled Substances Act (CSA). This memorandum updates that guidance in light of state ballot initiatives that legalize under state law the possession of small amounts of marijuana and provide for the regulation of marijuana production, processing, and sale. The guidance set forth herein applies to all federal enforcement activity, including civil enforcement and criminal investigations and prosecutions, concerning marijuana in all states.

As the Department noted in its previous guidance, Congress has determined that marijuana is a dangerous drug and that the illegal distribution and sale of marijuana is a serious crime that provides a significant source of revenue to large-scale criminal enterprises, gangs, and cartels. The Department of Justice is committed to enforcement of the CSA consistent with those determinations. The Department is also committed to using its limited investigative and prosecutorial resources to address the most significant threats in the most effective, consistent, and rational way. In furtherance of those objectives, as several states enacted laws relating to the use of marijuana for medical purposes, the Department in recent years has focused its efforts on certain enforcement priorities that are particularly important to the federal government:

- Preventing the distribution of marijuana to minors;
- Preventing revenue from the sale of marijuana from going to criminal enterprises, gangs, and cartels;
- Preventing the diversion of marijuana from states where it is legal under state law in some form to other states;
- Preventing state-authorized marijuana activity from being used as a cover or pretext for the trafficking of other illegal drugs or other illegal activity;

Memorandum for All United States Attorneys  
Subject: Guidance Regarding Marijuana Enforcement

Page 2

- Preventing violence and the use of firearms in the cultivation and distribution of marijuana;
- Preventing drugged driving and the exacerbation of other adverse public health consequences associated with marijuana use;
- Preventing the growing of marijuana on public lands and the attendant public safety and environmental dangers posed by marijuana production on public lands; and
- Preventing marijuana possession or use on federal property.

These priorities will continue to guide the Department's enforcement of the CSA against marijuana-related conduct. Thus, this memorandum serves as guidance to Department attorneys and law enforcement to focus their enforcement resources and efforts, including prosecution, on persons or organizations whose conduct interferes with any one or more of these priorities, regardless of state law.<sup>1</sup>

Outside of these enforcement priorities, the federal government has traditionally relied on states and local law enforcement agencies to address marijuana activity through enforcement of their own narcotics laws. For example, the Department of Justice has not historically devoted resources to prosecuting individuals whose conduct is limited to possession of small amounts of marijuana for personal use on private property. Instead, the Department has left such lower-level or localized activity to state and local authorities and has stepped in to enforce the CSA only when the use, possession, cultivation, or distribution of marijuana has threatened to cause one of the harms identified above.

The enactment of state laws that endeavor to authorize marijuana production, distribution, and possession by establishing a regulatory scheme for these purposes affects this traditional joint federal-state approach to narcotics enforcement. The Department's guidance in this memorandum rests on its expectation that states and local governments that have enacted laws authorizing marijuana-related conduct will implement strong and effective regulatory and enforcement systems that will address the threat those state laws could pose to public safety, public health, and other law enforcement interests. A system adequate to that task must not only contain robust controls and procedures on paper; it must also be effective in practice. Jurisdictions that have implemented systems that provide for regulation of marijuana activity

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<sup>1</sup> These enforcement priorities are listed in general terms; each encompasses a variety of conduct that may merit civil or criminal enforcement of the CSA. By way of example only, the Department's interest in preventing the distribution of marijuana to minors would call for enforcement not just when an individual or entity sells or transfers marijuana to a minor, but also when marijuana trafficking takes place near an area associated with minors; when marijuana or marijuana-infused products are marketed in a manner to appeal to minors; or when marijuana is being diverted, directly or indirectly, and purposefully or otherwise, to minors.

Memorandum for All United States Attorneys  
Subject: Guidance Regarding Marijuana Enforcement

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must provide the necessary resources and demonstrate the willingness to enforce their laws and regulations in a manner that ensures they do not undermine federal enforcement priorities.

In jurisdictions that have enacted laws legalizing marijuana in some form and that have also implemented strong and effective regulatory and enforcement systems to control the cultivation, distribution, sale, and possession of marijuana, conduct in compliance with those laws and regulations is less likely to threaten the federal priorities set forth above. Indeed, a robust system may affirmatively address those priorities by, for example, implementing effective measures to prevent diversion of marijuana outside of the regulated system and to other states, prohibiting access to marijuana by minors, and replacing an illicit marijuana trade that funds criminal enterprises with a tightly regulated market in which revenues are tracked and accounted for. In those circumstances, consistent with the traditional allocation of federal-state efforts in this area, enforcement of state law by state and local law enforcement and regulatory bodies should remain the primary means of addressing marijuana-related activity. If state enforcement efforts are not sufficiently robust to protect against the harms set forth above, the federal government may seek to challenge the regulatory structure itself in addition to continuing to bring individual enforcement actions, including criminal prosecutions, focused on those harms.

The Department's previous memoranda specifically addressed the exercise of prosecutorial discretion in states with laws authorizing marijuana cultivation and distribution for medical use. In those contexts, the Department advised that it likely was not an efficient use of federal resources to focus enforcement efforts on seriously ill individuals, or on their individual caregivers. In doing so, the previous guidance drew a distinction between the seriously ill and their caregivers, on the one hand, and large-scale, for-profit commercial enterprises, on the other, and advised that the latter continued to be appropriate targets for federal enforcement and prosecution. In drawing this distinction, the Department relied on the common-sense judgment that the size of a marijuana operation was a reasonable proxy for assessing whether marijuana trafficking implicates the federal enforcement priorities set forth above.

As explained above, however, both the existence of a strong and effective state regulatory system, and an operation's compliance with such a system, may allay the threat that an operation's size poses to federal enforcement interests. Accordingly, in exercising prosecutorial discretion, prosecutors should not consider the size or commercial nature of a marijuana operation alone as a proxy for assessing whether marijuana trafficking implicates the Department's enforcement priorities listed above. Rather, prosecutors should continue to review marijuana cases on a case-by-case basis and weigh all available information and evidence, including, but not limited to, whether the operation is demonstrably in compliance with a strong and effective state regulatory system. A marijuana operation's large scale or for-profit nature may be a relevant consideration for assessing the extent to which it undermines a particular federal enforcement priority. The primary question in all cases and in all jurisdictions should be whether the conduct at issue implicates one or more of the enforcement priorities listed above.

Memorandum for All United States Attorneys  
Subject: Guidance Regarding Marijuana Enforcement

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As with the Department's previous statements on this subject, this memorandum is intended solely as a guide to the exercise of investigative and prosecutorial discretion. This memorandum does not alter in any way the Department's authority to enforce federal law, including federal laws relating to marijuana, regardless of state law. Neither the guidance herein nor any state or local law provides a legal defense to a violation of federal law, including any civil or criminal violation of the CSA. Even in jurisdictions with strong and effective regulatory systems, evidence that particular conduct threatens federal priorities will subject that person or entity to federal enforcement action, based on the circumstances. This memorandum is not intended to, does not, and may not be relied upon to create any rights, substantive or procedural, enforceable at law by any party in any matter civil or criminal. It applies prospectively to the exercise of prosecutorial discretion in future cases and does not provide defendants or subjects of enforcement action with a basis for reconsideration of any pending civil action or criminal prosecution. Finally, nothing herein precludes investigation or prosecution, even in the absence of any one of the factors listed above, in particular circumstances where investigation and prosecution otherwise serves an important federal interest.

cc: **Mythili Raman**  
Acting Assistant Attorney General, Criminal Division

Loretta E. Lynch  
United States Attorney  
Eastern District of New York  
Chair, Attorney General's Advisory Committee

Michele M. Leonhart  
Administrator  
Drug Enforcement Administration

H. Marshall Jarrett  
Director  
Executive Office for United States Attorneys

Ronald T. Hosko  
Assistant Director  
Criminal Investigative Division  
Federal Bureau of Investigation

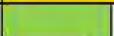
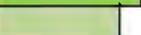
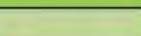
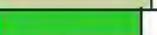
Medical Cannabis/Conditions

Hybrid Strains		Treatment	
<b>Blue Cheese</b>  CBD: 1.3% Avg. THC: 20% Avg.		Depression	
		Insomnia	
		Nausea	
		Pain	
		Stress	
		Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and Bipolar Disorder.	
<b>Blue Chemdawg</b>  THC: 15-20%		Depression	
		Insomnia	
		Nausea	
		Pain	
		Stress	
		Also used to help with ADD/ADHD, Anxiety, Migraines, PTSD, and Spinal Cord Injury.	
<b>Blue Dream</b>  CBD: 0.4% Avg. CBN: 0.3% Avg. THC: 18% Avg.		Depression	
		Insomnia	
		Nausea	
		Pain	
		Stress	
		Also used to help with Anxiety, Arthritis, Migraines, PMS, and PTSD.	
<b>Bubba Kush</b>  CBD: TBD THC: TBD		Depression	
		Insomnia	
		Nausea	
		Pain	
		Stress	
		Also used to help with ADD/ADHD, Anxiety, Migraines, PMS, and Spinal Cord Injury.	

Guided Steps Compassion Center  
Medical Cannabis/Condition

<p>California Dream THC: Up to 24%</p>		<table border="1"> <tbody> <tr><td>Depression</td><td></td></tr> <tr><td>Insomnia</td><td></td></tr> <tr><td>Nausea</td><td></td></tr> <tr><td>Pain</td><td></td></tr> <tr><td>Stress</td><td></td></tr> </tbody> </table> <p>Also used to help with Anxiety, Arthritis, Migraines, PMS, and PTSD.</p>	Depression		Insomnia		Nausea		Pain		Stress	
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Insomnia												
Nausea												
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<p>Caramelicious THC: Up to 21%</p>		<table border="1"> <tbody> <tr><td>Depression</td><td></td></tr> <tr><td>Insomnia</td><td></td></tr> <tr><td>Nausea</td><td></td></tr> <tr><td>Pain</td><td></td></tr> <tr><td>Stress</td><td></td></tr> </tbody> </table> <p>Also used to help with Anxiety, Migraines, and PMS.</p>	Depression		Insomnia		Nausea		Pain		Stress	
Depression												
Insomnia												
Nausea												
Pain												
Stress												
<p>*CBD Kush <u>*CBD-Rich Strain:</u> CBD: 7% Avg. THC: 7% Avg.</p>		<table border="1"> <tbody> <tr><td>Anxiety</td><td></td></tr> <tr><td>Migraines</td><td></td></tr> <tr><td>PMS</td><td></td></tr> </tbody> </table> <p>Also used to help with Depression, Muscle Spasms, Nausea, Stress, Arthritis, ADD/ADHD, and Bipolar Disorder.</p>	Anxiety		Migraines		PMS					
Anxiety												
Migraines												
PMS												
<p>*CBD Critical Mass <u>*CBD-Rich Strain:</u> CBD: 8.13% Avg. THC: 5.49% Avg.</p>		<table border="1"> <tbody> <tr><td>Anxiety</td><td></td></tr> <tr><td>Arthritis</td><td></td></tr> <tr><td>Migraines</td><td></td></tr> <tr><td>ADD/ADHD</td><td></td></tr> <tr><td>Bipolar Disorder</td><td></td></tr> </tbody> </table> <p>Also used to help with Depression, Muscle Spasms, Nausea, and Stress.</p>	Anxiety		Arthritis		Migraines		ADD/ADHD		Bipolar Disorder	
Anxiety												
Arthritis												
Migraines												
ADD/ADHD												
Bipolar Disorder												
<p>*CBD Medical Haze <u>*CBD-Rich Strain:</u> CBD: 8% Avg. THC: 4% Avg.</p>		<p>Used to help with Chronic Pain, Fear, Nausea, Rheumatism, and Seizures.</p>										

Guided Steps Compassion Center  
Medical Cannabis/Condition

<p><b>Chemdawg</b> CBD: 0.2% THC: Up to 20%</p>		<p><b>Anxiety</b> </p> <p><b>Migraines</b> </p> <p><b>PTSD</b> </p> <p><b>ADD/ADHD</b> </p> <p><b>Spinal Cord Injury</b> </p> <p>Also used to help with Chronic Pain and Depression.</p>
<p><b>*Charlotte's Web</b> <b>*CBD-Rich Strain:</b> CBD: 75% Avg. THC: 24% Avg.</p>		<p><b>Depression</b> </p> <p><b>Insomnia</b> </p> <p><b>Nausea</b> </p> <p><b>Pain</b> </p> <p><b>Stress</b> </p> <p>Used to help with ADD/ADHD, Anxiety, Epilepsy, Migraines.</p>
<p><b>Giri Scout Cookies</b> CBD: 0.7-1% THC: 18-23%</p>		<p><b>Anxiety</b> </p> <p><b>Migraines</b> </p> <p><b>ADD/ADHD</b> </p> <p><b>PTSD</b> </p> <p><b>PMS</b> </p> <p>Also used to help with Depression and Pain.</p>
<p><b>La Blanca</b> THC: Up to 23%</p>		<p><b>Arthritis</b> </p> <p><b>Anxiety</b> </p> <p><b>Migraines</b> </p> <p><b>Pain</b> </p> <p><b>PMS</b> </p> <p>Also used to help with relaxing muscles and increasing appetite.</p>
<p><b>Larry OG Kush</b> THC: 18% Avg.</p>		<p><b>Depression</b> </p> <p><b>Insomnia</b> </p> <p><b>Lack of Appetite</b> </p> <p><b>Pain</b> </p> <p><b>Stress</b> </p> <p>Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and PTSD.</p>

Guided Steps Compassion Center Medical Cannabis/Condition												
<b>Light of Jah</b> THC: Up to 20%		Used to help with Chronic Pain or similar conditions.										
<b>Medijuana</b> THC: Up to 25%		Used to help with Chronic Pain, Migraines, Sleep Disorders, and treatment for Chemotherapy.										
<b>Mega Jackpot</b> THC: Up to 25%		<table border="1"> <tr> <td>Anxiety</td> <td><div style="width: 70%; background-color: #FFD700;"></div></td> </tr> <tr> <td>Chronic Pain</td> <td><div style="width: 60%; background-color: #90EE90;"></div></td> </tr> <tr> <td>Nausea</td> <td><div style="width: 40%; background-color: #90EE90;"></div></td> </tr> <tr> <td>Migraines</td> <td><div style="width: 70%; background-color: #32CD32;"></div></td> </tr> </table> <p>Also used to help with Insomnia.</p>	Anxiety	<div style="width: 70%; background-color: #FFD700;"></div>	Chronic Pain	<div style="width: 60%; background-color: #90EE90;"></div>	Nausea	<div style="width: 40%; background-color: #90EE90;"></div>	Migraines	<div style="width: 70%; background-color: #32CD32;"></div>		
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<b>OG's Kush</b> THC: 16-24% Avg. THCA: 21% Avg.		<table border="1"> <tr> <td>Anxiety</td> <td><div style="width: 90%; background-color: #FFD700;"></div></td> </tr> <tr> <td>Migraines</td> <td><div style="width: 50%; background-color: #90EE90;"></div></td> </tr> <tr> <td>ADD/ADHD</td> <td><div style="width: 40%; background-color: #90EE90;"></div></td> </tr> <tr> <td>PMS</td> <td><div style="width: 20%; background-color: #32CD32;"></div></td> </tr> <tr> <td>Bipolar Disorder</td> <td><div style="width: 15%; background-color: #ADD8E6;"></div></td> </tr> </table>	Anxiety	<div style="width: 90%; background-color: #FFD700;"></div>	Migraines	<div style="width: 50%; background-color: #90EE90;"></div>	ADD/ADHD	<div style="width: 40%; background-color: #90EE90;"></div>	PMS	<div style="width: 20%; background-color: #32CD32;"></div>	Bipolar Disorder	<div style="width: 15%; background-color: #ADD8E6;"></div>
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<b>Purple OG</b> CBD: TBD THD: TBD		<table border="1"> <tr> <td>Depression</td> <td><div style="width: 60%; background-color: #FFD700;"></div></td> </tr> <tr> <td>Headaches</td> <td><div style="width: 40%; background-color: #90EE90;"></div></td> </tr> <tr> <td>Insomnia</td> <td><div style="width: 50%; background-color: #90EE90;"></div></td> </tr> <tr> <td>Pain</td> <td><div style="width: 70%; background-color: #32CD32;"></div></td> </tr> <tr> <td>Stress</td> <td><div style="width: 80%; background-color: #ADD8E6;"></div></td> </tr> </table> <p>Also used to help with Anxiety, Migraines, and PMS.</p>	Depression	<div style="width: 60%; background-color: #FFD700;"></div>	Headaches	<div style="width: 40%; background-color: #90EE90;"></div>	Insomnia	<div style="width: 50%; background-color: #90EE90;"></div>	Pain	<div style="width: 70%; background-color: #32CD32;"></div>	Stress	<div style="width: 80%; background-color: #ADD8E6;"></div>
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Stress	<div style="width: 80%; background-color: #ADD8E6;"></div>											

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<p><b>Sour Diesel</b> CBD: Medium THC: 19-21%</p>		<table border="1"> <tbody> <tr> <td>Anxiety</td> <td></td> </tr> <tr> <td>Migraines</td> <td></td> </tr> <tr> <td>ADD/ADHD</td> <td></td> </tr> <tr> <td>Bipolar Disorder</td> <td></td> </tr> <tr> <td>PTSD</td> <td></td> </tr> <tr> <td colspan="2">Also used to help with Depression, Insomnia, HIV-AIDS, Nausea, Pain, and Stress.</td> </tr> </tbody> </table>	Anxiety		Migraines		ADD/ADHD		Bipolar Disorder		PTSD		Also used to help with Depression, Insomnia, HIV-AIDS, Nausea, Pain, and Stress.	
Anxiety														
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ADD/ADHD														
Bipolar Disorder														
PTSD														
Also used to help with Depression, Insomnia, HIV-AIDS, Nausea, Pain, and Stress.														
<p><b>Stacked Kush</b> CDB: 0.7-1.0% THC: 18-20%</p>		<p>Used to help with Anxiety and Depression.</p>												
<p><b>Strawberry Cough</b> CBD: TBD THC: TBD</p>		<table border="1"> <tbody> <tr> <td>Anxiety</td> <td></td> </tr> <tr> <td>Migraines</td> <td></td> </tr> <tr> <td>ADD/ADHD</td> <td></td> </tr> <tr> <td>Bipolar Disorder</td> <td></td> </tr> <tr> <td>Gastro. Disorder</td> <td></td> </tr> </tbody> </table>	Anxiety		Migraines		ADD/ADHD		Bipolar Disorder		Gastro. Disorder			
Anxiety														
Migraines														
ADD/ADHD														
Bipolar Disorder														
Gastro. Disorder														
<p><b>Strawberry Ice</b> THC: 8-15%</p>		<p>Used to help with Stress, Chronic Pain, and Nausea.</p>												
<p><b>Super Nova</b> TCH: Up to 25%</p>		<p>Used to help with Anorexia, Anxiety, Chronic Pain, and Insomnia.</p>												

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Medical Cannabis/Condition

<p><b>Super Silver Haze</b> CBD: 0.01% Avg. CBN: 0.14% Avg. THC: 14.7% Avg.</p>		<table border="1"> <tbody> <tr> <td>Anxiety</td> <td></td> </tr> <tr> <td>Migraines</td> <td></td> </tr> <tr> <td>PMS</td> <td></td> </tr> <tr> <td>PTSD</td> <td></td> </tr> <tr> <td>Epilepsy</td> <td></td> </tr> </tbody> </table> <p>Also used to help with Depression.</p>	Anxiety		Migraines		PMS		PTSD		Epilepsy	
Anxiety												
Migraines												
PMS												
PTSD												
Epilepsy												
<p><b>Waikiki Queen</b> THC: Up to 24%</p>		<p>Used to help with Chronic Pain and Depression.</p>										
<p><b>White Queen</b> TCH: Up to 25%</p>		<table border="1"> <tbody> <tr> <td>Depression</td> <td></td> </tr> <tr> <td>Fatigue</td> <td></td> </tr> <tr> <td>Insomnia</td> <td></td> </tr> <tr> <td>Pain</td> <td></td> </tr> <tr> <td>Stress</td> <td></td> </tr> </tbody> </table> <p>Also used to help with Anxiety and Migraines.</p>	Depression		Fatigue		Insomnia		Pain		Stress	
Depression												
Fatigue												
Insomnia												
Pain												
Stress												
<p><b>White Widow</b> TCH: Up to 25%</p>		<table border="1"> <tbody> <tr> <td>Depression</td> <td></td> </tr> <tr> <td>Insomnia</td> <td></td> </tr> <tr> <td>Nausea</td> <td></td> </tr> <tr> <td>Pain</td> <td></td> </tr> <tr> <td>Stress</td> <td></td> </tr> </tbody> </table> <p>Also used to help with Anxiety, Migraines, PTSD, Gastro. Disorders, and ADD/ADHD.</p>	Depression		Insomnia		Nausea		Pain		Stress	
Depression												
Insomnia												
Nausea												
Pain												
Stress												
<p><b>Indica Strains</b></p>		<p><b>Treatment</b></p>										
<p><b>Pakistan Chitral Kush</b> CBD: TBD THC: TBD THCA: TBD</p>		<p>Used to help with Depression, Mood Enhancement, Relaxing, and Stress.</p>										

Guided Steps Compassion Center  
Medical Cannabis/Condition

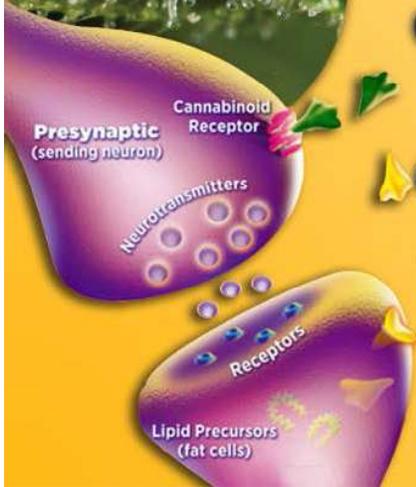
<p>*Pakistan Valley  *CBD Rich Strain CBD: 7.9% Avg. THC: 21.2% Avg.</p>		<p>Used to help with Chronic Pain relief.</p>										
<p>Purple Kush  CBD: TBD THC: TBD</p>		<table border="1"> <tr> <td>Depression</td> <td></td> </tr> <tr> <td>Headaches</td> <td></td> </tr> <tr> <td>Insomnia</td> <td></td> </tr> <tr> <td>Pain</td> <td></td> </tr> <tr> <td>Stress</td> <td></td> </tr> </table> <p>Also used to help with Anxiety, Cancer, Migraines, ADD/ADHD, PMS, Multiple Sclerosis</p>	Depression		Headaches		Insomnia		Pain		Stress	
Depression												
Headaches												
Insomnia												
Pain												
Stress												
<p><b>Sativa Strains</b></p>		<p><b>Treatment</b></p>										
<p>Jack Herer  CBD: TBD THC: 16% Avg. THCA: 23% Avg.</p>		<table border="1"> <tr> <td>Depression</td> <td></td> </tr> <tr> <td>Fatigue</td> <td></td> </tr> <tr> <td>Insomnia</td> <td></td> </tr> <tr> <td>Pain</td> <td></td> </tr> <tr> <td>Stress</td> <td></td> </tr> </table> <p>Also used to help with Anxiety, Migraines, ADD/ADHD, Gastro. Disorder, and Hypertension</p>	Depression		Fatigue		Insomnia		Pain		Stress	
Depression												
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Pain												
Stress												

### The Human Endocannabinoid System

THC and CBN are known to "fit" like lock and key into network of existing receptors. The Endocannabinoid System exists to receive cannabinoids produced inside the body called "Anandamide" and "2-Arachidonylglycerol". Stimulating the ECS with plant-based cannabinoids restores balance and helps maintain symptoms.

CB1 receptors are concentrated in the brain and central nervous system but also sparsely populates other parts of the human body.

Receptors are found on cell surfaces



Tetrahydrocannabinol



Cannabidiol

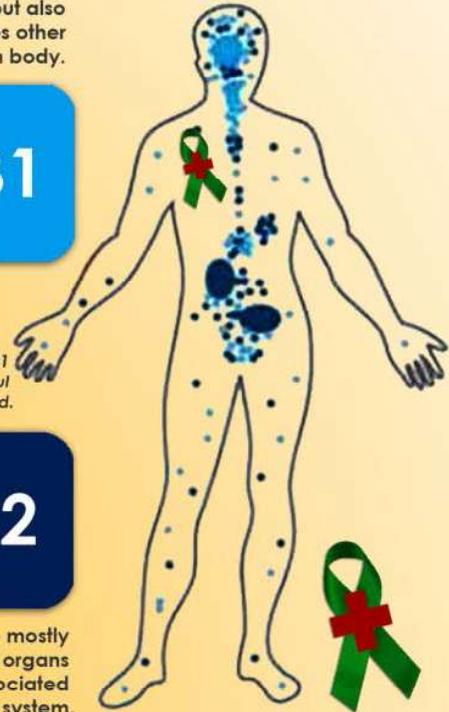
CBD does not directly "fit" CB1 or CB2 receptors but has powerful indirect effects still being studied.



Cannabinol



CB2 receptors are mostly in the peripheral organs especially cells associated with the immune system.

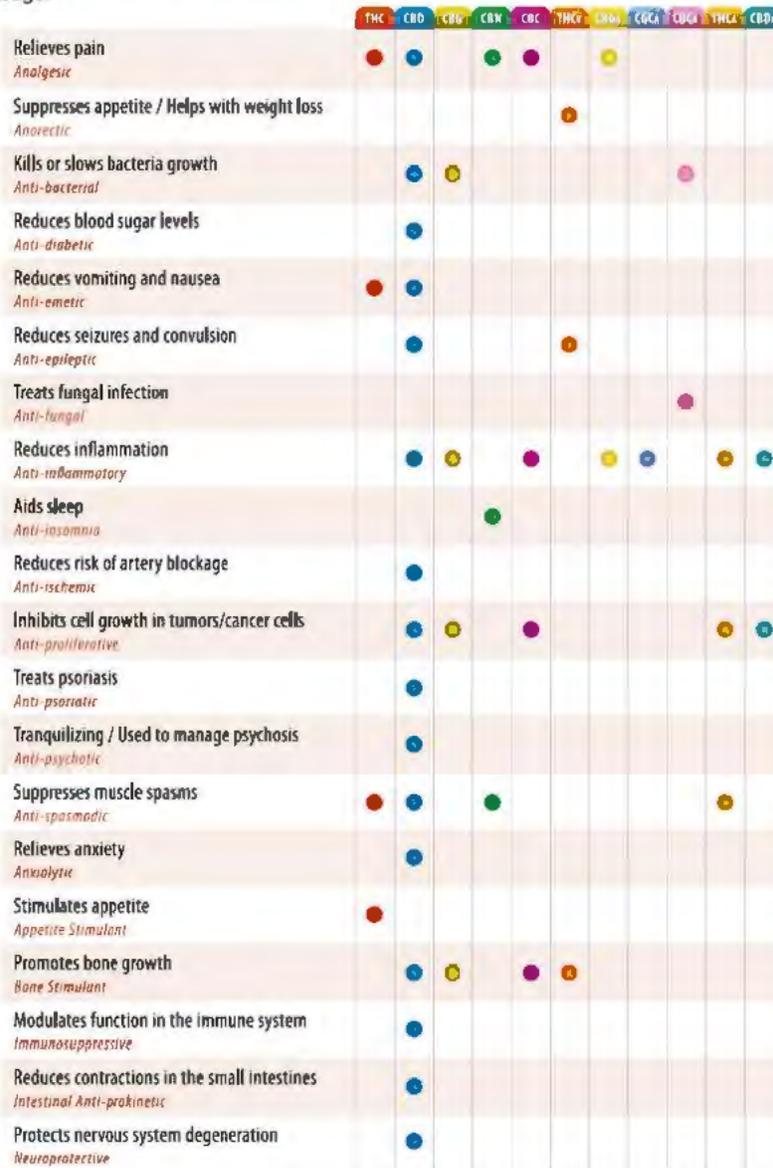


[www.the-human-solution.org](http://www.the-human-solution.org)



### Know Your Medicine Ailments and Corresponding Cannabinis

Researchers have identified over 70 unique cannabinoids within the cannabis plant, many of which interact with the human endo-cannabinoid system using the cannabinoid receptors found throughout your body. Some cannabinoids bind more selectively to certain receptors and are more specific for desired medical usage.



These statements have not been evaluated by the FDA. Guided Steps Compassion Center makes no claims meant to diagnose, treat, or cure any disease or medical condition. Please consult with your doctor prior to starting ANY medical treatment or before using ANY medical product during pregnancy or if you have a serious medical condition.



### Ways to Consume Medical Marijuana

Medical marijuana is a very effective medicine used by patients across the globe to treat and alleviate symptoms of many serious conditions in which traditional interventions have failed. Studies have proven that cannabis has therapeutic properties not be replicated by any other currently prescribed medications, AND has far fewer and much less severe side effects.

One of the first questions we're asked is: **What are the best and healthiest ways to consume medical marijuana?**

We tell patients that first, they must have a recommendation letter from a qualifying doctor or a medical marijuana card. Once they have this, they can purchase different types of cannabis to be used as medicine from a local marijuana dispensary. For those who choose not to smoke marijuana, there are numerous alternative forms, such as marijuana based products and foods. Here we discuss all the various methods of consumption of medical marijuana available to patients in need.

#### Smoking Medical Marijuana



Smoking is the most expedient method of consumption, with almost immediate effect and dosage controlled by the patient. The downside to smoking marijuana, although not as harmful as cigarettes, is that it can damage the lungs and cause respiratory problems. Although results from clinical trials have been contradictory, many researchers believe herbal marijuana contains toxins and carcinogens that lead to increased risk of respiratory diseases and cancer and therefore recommend other methods of consumption of medical marijuana besides smoking.

If you do choose to smoke, here are some helpful tips to minimize the risk due to toxins and tars contained in the marijuana:

- Use a more potent, higher THC cannabis so less inhalation is necessary to acquire an effective dose.
- Using a pipe allows a more consistent and predictable dosage.
- Use a filter and non-chemical rolling paper if smoking a marijuana cigarette (joint).
- Exhale immediately after inhaling deeply to avoid the tars in the marijuana from coating your lungs. It is a myth that holding your breath will create a stronger dosage or enable more THC to be absorbed.

Guided Steps Compassion Center  
Ways to Consume Medical Marijuana

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**Medical Marijuana Vaporizers**



Use of a marijuana vaporizer is the most recommended method as an alternative to smoking. A vaporizer is a device that gently heats up cannabis at a lower temperature, achieved with digital accuracy, releasing the active medicinal components of marijuana, such as THC, while producing fewer harmful byproducts.

**How the Medical Marijuana Vaporizer Works:**

A vaporizer heats the cannabis plant slowly causing the active ingredients to evaporate into a vapor without reaching the point of combustion, thereby releasing a much lower proportion of other harmful components that come from smoking. Inhalation of the vapor then offers the same therapeutic benefits of smoking but without exposure to harmful toxins.

**Medical Marijuana Edibles**



The effects of consumed cannabis is much different compared to smoking or vaporizing. Edibles are slower to kick in, slow to wear off and usually give more of a "body" versus "head" high, an effect described as 'heavier' or 'deeper' than if smoked or inhaled. This can be particularly beneficial for those with chronic severe body pain.

A word of caution to those choosing to medicate with edible marijuana – unlike with smoking and vaporizing, it is much easier to over-consume, and therefore over-medicate with ingestion. Because it can take longer to feel the effect and/or because the edibles taste good, patients are warned to start with a small amount, wait an hour or two before ingesting more, and be extra careful in consumption so as not to exceed recommended dosage.

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Ways to Consume Medical Marijuana

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That said, it's also important to realize that eating raw cannabis does not deliver therapeutic benefits and is not recommended. Marijuana edibles are made, instead, with butters or oils derived from the cannabis plant, often called cannabutter or cannabis infused oil. Marijuana butters and oils are made by simmering the cannabis flowered tops and leaves in butter or vegetable oil for several hours. This process transfers the THC and other therapeutic cannabinoids into the butter or oil, which can then be used in cooking all sorts of food, such as brownies, cookies, candies, as well as liquids, such as soup and sauces.

Marijuana edibles are particularly helpful to relieve pain, spasticity and sleep disorders but is, for obvious reasons, not the best method if experiencing nausea or vomiting. Dispensaries can help you to experiment which type of edible and dose is best for your particular situation and to find the best tasting edibles.

**Medical Marijuana Tinctures & Tonics**



Cannabis can also be made into tinctures and tonics, which are then added to food and liquids, applied on the skin, or consumed directly in small amounts or by placing drops under the tongue. This is particularly useful when nausea and vomiting are present, such as when undergoing chemotherapy treatments. Tinctures and tonics are made much in the same way as edibles, but instead of cooking them in butter or oil, the cannabis flowered tops and leaves are soaked in alcohol. The solids are then finely strained, leaving behind a liquid that contains the THC and other cannabinoids that produce the needed medical relief. Typical dosage of marijuana tinctures is between 3 drops to no more than 2 full droppers. As with the edibles, it is best to start slow and use only a small portion until relief from symptoms is achieved.

**Medical Marijuana Topicals**



Another alternative route of administration for medical marijuana free from any psychoactive reactions is to use a topical made from cannabis and apply it directly onto the skin. Marijuana topicals, such as balms, salves, lotions, sprays and ointments made from cannabis oils, can be

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Ways to Consume Medical Marijuana

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very effective analgesics and anti-inflammatories. Most dispensaries will have a variety of marijuana topicals to choose from, or you can make your own using cannabis oil and adding it to a substance of your choice.

Conditions in which marijuana topicals have helped provide relief are arthritis, chapped skin, eczema, minor burns, muscle soreness, sunburns, swellings, joint pain, and tendonitis- to name a few. Many dispensaries also carry sprays that can be used topically to ease muscle aches that accompany many conditions and more importantly the painful symptoms of shingles. It is especially useful for the unfortunate few who develop post-herpetic neuralgia (phn), a nerve inflammation condition that results from shingles disease. Topicals have been proven to not only have anti-inflammatory properties but also to act as an antibacterial, quickening healing times for injuries.

#### Medical Marijuana Tea & Sodas



Cannabis leaves, stems, and buds can also be used in making a medicinal tea. The process is fairly simple. As with other herb teas, boil the water, pour this over the leaves and stems in a small pot or cup, and let steep for at least half an hour. Similar to marijuana edibles and tinctures, adding alcohol, oil or butter is necessary to help dissolve the THC, which is only slightly soluble in boiling water. Recipes often use milk, spices, and sometimes hard liquor to make a spiced chai-type tea.

Marijuana tea can vary in strength, depending on the types and amounts of ingredients used. Teas have been described by patients to vary from being much like drinking chamomile tea to delivering a high that lasted for hours. General advice is to start with an amount equivalent to a marijuana cigarette for each cup, however experimenting with different recipes and amounts will help determine the amount needed to deliver the therapeutic effect desired.

For those that prefer consuming marijuana in liquid form, there are several marijuana sodas available at some dispensaries as well. Sodas are made by adding a marijuana tincture (see tinctures above.) The latest sodas to hit the market were released late last year by Clay Butler. The 12 ounce cans containing between 35-65 milligrams of THC come in five flavors: Canna Cola, lemon-lime Sour Diesel, Doc Weed (much like Dr. Pepper,) Grape Ape and Orange Kush. Other sodas are available as well so if this seems like an option for you, check with your local dispensary.

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Ways to Consume Medical Marijuana

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#### Hash & Wax



Hash is made by collecting the resin from the flowers of a female cannabis plant, also called trichomes. The primary active substance of this part of the cannabis plant is THC (tetrahydrocannabinol) along with other cannabinoids as well.

The resin collected from the marijuana flowers can then be compressed into small blocks (sometimes referred to as Ear Wax), which can then be eaten, smoked, or added to tea, edibles and other medical marijuana products. Hash differs than dried marijuana buds, stems and leaves in that it has a much higher concentration of THC. Due to the high potency, patients will often combine a small amount of hash with a less potent form of cannabis to create a very strong and immediate effect, offering pain relief in minutes.

Check with your local dispensary for hashish products they carry and how to use them best for pain or symptom relief from your medical condition.



DRAFT

### Traveling with Medical Marijuana

It can be a challenge to travel for medical marijuana patients. In addition to concerns brought on by their condition, traveling with medical marijuana can be difficult, especially for out-of-state trips. Even in certain areas of the country, in-state travel can present problems when local ordinances vary. Patients should consider the following factors before traveling with their medication:

#### Traveling Within the Same State

Medical marijuana patients who are appropriately registered with their state should not encounter problems if they are traveling locally. Patients may have their medication on their person when they are walking and driving within their own county. For out-of-county trips, patients should be aware that some counties set their own laws regarding maximum medical marijuana amounts, though, in California for example, all counties must allow at least the state minimum. Patients should know their state's laws and, as a rule of thumb, avoid traveling to unfamiliar areas with more than the allowed minimum.

If a patient is traveling out-of-county and the state's recognized minimum is not sufficient, it may be possible to arrange temporary dispensary privileges in the area where the patient is staying. Patients should ask the dispensary they are currently using for advice, or check their state's website for the rules.

**Whether in state or out of state, medical marijuana patients should never travel with marijuana plants.** Even in states where it is legal to grow medical marijuana plants, their transportation is highly restricted. In California, for example, there are only three situations where it is appropriate to travel with these plants:

- When a patient or caregiver is bringing plants from a dispensary to a residence.
- When a registered caregiver is moving plants from one patient's residence to another.
- When a patient is moving residences.

Except for these situations, avoid traveling with medical marijuana plants to minimize the chance of legal complications.

#### Out of State Trips

Travel to different states for medical marijuana patients is difficult because they cannot legally bring their medical marijuana in most cases. Patients should note these guidelines:

- States without medical marijuana laws can arrest patients under possession laws, even if the patient is registered in their home state.
- Federal authorities can arrest patients under federal drug trafficking laws if medical marijuana crosses state lines.
- In states that recognize medical marijuana cards issued by the patient's home state (called reciprocity), the patient usually still needs to register in the state that they are visiting and acquire any medical marijuana needed there, rather than bringing it with them.
- In the above situation if patients plan to bring their own medical marijuana, they should make sure that the states border one another so that they are not traveling through states where medical marijuana is illegal.

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Traveling with Medical Marijuana

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#### **Traveling by Ground vs. Flying with Medical Marijuana**

The safest mode of transportation for traveling patients is by car. Private bus and train companies may remove passengers at their own discretion who appear under the influence or are known to possess medical marijuana, even with a medical marijuana card or valid physician's letter.

As for flying, airports and airplanes are federal jurisdictions, and patients can be detained and arrested when going through security. Federal authorities do not recognize the medical marijuana laws or cards of any state. There are some airports that are medical marijuana 'friendly' and allow patients with correct documents to board with the amount deemed necessary for personal consumption.

Always check the laws of your home state and the state that you will be visiting before taking a trip with your medication. Though it is very helpful to patients, medical marijuana is not yet legal in all areas and even in states where medicinal use of marijuana is legal, state and local laws vary. Know your rights and responsibilities as a patient, and always ask an authority if you are unsure of the law.

Source: <http://www.unitedpatientsgroup.com/resources/traveling-with-medical-marijuana>

#### **Can I Fly with Medical Marijuana?**

This is a frequently asked question by medical marijuana patients and caregivers needing to travel outside their resident state. This question is one that immediately brings up one of the most debated political topics around the legalization of medical marijuana in the United States - federal versus state and local laws.

##### **The Answer According to Federal Law**

According to federal law the answer is no - you may NEVER fly on a commercial airliner with marijuana or marijuana containing products, even if you have a doctor's written recommendation for medical marijuana or a medical marijuana identification card (MMIC). It does not matter if you are flying within state, out of state or out of the country, the answer is always no.

Airports, airspace and airplanes all fall under federal jurisdiction and marijuana, medical or otherwise, is considered illegal under federal law. Therefore, technically, if you choose to travel by plane with medical marijuana, you risk being detained, arrested and prosecuted under federal law even if the state you are departing from allows you to possess and use marijuana legally.

Under federal law, possession of marijuana is punishable by up to one year in jail and a minimum fine of \$1,000 for a first conviction. For each subsequent conviction, the sentences and penalties increase.

##### **The Answer According to State Law**

Whether or not you can fly within different areas of a single state with medical marijuana depends on the state in which you are traveling.

##### **Flying Internationally**

The general rule here falls outside state, local and even federal law - never travel internationally with any amount of medical marijuana unless you want to take the risk of being detained, arrested, charged, missing your flight, and having your medicine confiscated.

Source: <http://www.unitedpatientsgroup.com/resources/traveling-with-medical-marijuana/flying/california>

Guided Steps Compassion Center  
Traveling with Medical Marijuana

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**Transportation Security Administration (TSA)**  
U.S. Department of Homeland Security

**TSA's Policy**

TSA security officers do not search for marijuana or other drugs. In the event a substance that appears to be marijuana is observed during security screening, TSA will refer the matter to a law enforcement officer.

Whether or not marijuana is considered legal under local law is not relevant to TSA screening because TSA is governed by federal law. Federal law provides no basis to treat medical marijuana any differently than non-medical marijuana.

Even if an item is generally permitted, it may be subject to additional screening or not allowed through the checkpoint if it triggers an alarm during the screening process, appears to have been tampered with, or poses other security concerns. The final decision rests with TSA on whether to allow any items on the plane.

Source: [http://apps.tsa.dhs.gov/mytsa/cib\\_results.aspx?search=marijuana](http://apps.tsa.dhs.gov/mytsa/cib_results.aspx?search=marijuana)

**Appendix R – Sliding Scale Donation Form**



**Sliding Donation Scale Form**

<b>Patient Information</b>			Today's Date: / /	
First Name:	Middle:	Last:	Other names:	
Home Address:		City:	State:	Zip:
Mailing Address:		City:	State:	Zip:
Home Phone #: ( ) -		Home Phone #: ( ) -		
Date of Birth: / /	Social Security # - -	Do you have insurance? (circle one) Yes No		
Marital Status: (circle one)	Single	In a relationship	Married	Divorced Separated Widowed

Household Size		
Name	Date of Birth	Social Security Number
	/ /	- -
	/ /	- -
	/ /	- -
	/ /	- -

NOTE: To comply with federal regulations, in order to give you a discount on our medical services, it is necessary for us to ask some personal questions. Your answers will be kept on file and in strict confidence. You must verify your income at least every year.

Your yearly income tax return, a copy of your W-2 form, last month's paycheck stubs, copies of your social security checks, or other checks you may receive will be sufficient proof. Your annual income and your family size will be used to calculate your discount.

Household Income			
Name	Amount	Frequency (Circle one)	Employer:
You	\$	Weekly Monthly Yearly	
Spouse	\$	Weekly Monthly Yearly	
Children	\$	Weekly Monthly Yearly	
Other	\$	Weekly Monthly Yearly	
	\$	Weekly Monthly Yearly	
<b>TOTAL</b>	\$	Weekly Monthly Yearly	

Other Income	You	Spouse	Children	Other	Subtotal
Social Security					
Public Assistance					
Retirement Pension					
Food Stamps					
Child Support, Alimony					
Interest Income					
Other					
				<b>TOTAL</b>	\$

Sliding Fee Scale:

- A – 80% Discount
- B – 60% Discount
- C – 40% Discount
- D – 20% Discount
- E – 0%Discount



Sliding Donation Scale Form

I do hereby swear or affirm that the information provided on this application is true and correct to the best of my knowledge and belief. I agree that any misleading or falsified information, and/or omissions may disqualify me from further consideration for the sliding fee program and will subject me to penalties under Federal Laws which may include fines and imprisonment. I further agree to inform [health center name] if there is a significant change in my income. If acceptance to the sliding fee program is obtained under this application, I will comply with all rules and regulations of [health center name]. I hereby acknowledge that I read the foregoing disclosure and understand it.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_  
Please print

Date: \_\_\_\_\_



5182

Federal Register / Vol. 78, No. 16 / Thursday, January 24, 2013 / Notices

EARLY TERMINATIONS GRANTED DECEMBER 1, 2012 THRU DECEMBER 31, 2012—Continued

20130407	G	Alfa Laval AB; Clearview ACE Acquisition Company, LLC; Alfa Laval AB.
20130409	G	Citrix Systems, Inc.; Zenprise, Inc.; Citrix Systems, Inc.
<b>12/20/2012</b>		
20130313	G	Mercy Health; Jefferson Health System; Mercy Health.
20130364	G	Warburg Pincus Private Equity XI, L.P.; Morgan Stanley; Warburg Pincus Private Equity XI, L.P.
<b>12/21/2012</b>		
20130185	G	McKesson Corporation; PSS World Medical, Inc.; McKesson Corporation.
20130359	G	Leucadia National Corporation; Jefferies Group, Inc.; Leucadia National Corporation.
20130412	G	Global Eagle Acquisition Corp.; PAR Investment Partners, L.P.; Global Eagle Acquisition Corp.
20130424	G	Gregory B. Maffei; Liberty Media Corporation; Gregory B. Maffei.
20130425	G	Gregory B. Maffei; Liberty Interactive Corporation; Gregory B. Maffei.
20130440	G	GTCR Fund X/A LP; Enhanced Equity Fund, L.P.; GTCR Fund X/A LP.
20130452	G	The Medicines Company; Incline Therapeutics, Inc.; The Medicines Company.
<b>12/26/2012</b>		
20130330	G	John C. Malone; The John Risley 2009 Family Trust; John C. Malone.
20130433	G	Sanofi; Johnson & Johnson; Sanofi.
20130434	G	Young Innovations Holdings LLC; Young Innovations, Inc.; Young Innovations Holdings LLC.
20130437	G	John C. Malone; The Colin MacDonald 2009 Family Trust; John C. Malone.
20130439	G	Chesapeake Energy Corporation; FTS International, Inc.; Chesapeake Energy Corporation.
20130441	G	Barry Diller; Expedia, Inc.; Barry Diller.
20130445	G	Freeport-McMoRan Copper & Gold Inc.; Plains Exploration & Production Company; Freeport-McMoRan Copper & Gold Inc.
20130446	G	Freeport-McMoRan Copper & Gold Inc.; McMoRan Exploration Co.; Freeport-McMoRan Copper & Gold Inc.
<b>12/27/2012</b>		
20130343	G	Elliott International Limited; Compuware Corporation; Elliott International Limited.
<b>12/30/2012</b>		
20130350	G	Fast Retailing Co., Ltd.; JB Investors, L.P.; Fast Retailing Co., Ltd.
<b>12/31/2012</b>		
20130453	G	Dr. Guangu Lu; A123 Systems, Inc.; Dr. Guangu Lu.
20130478	G	Bayer AG; Iava Pharmaceutical Industries Ltd.; Bayer AG.

**FOR FURTHER INFORMATION CONTACT:**  
Renee Chapman, Contact Representative; or Theresa Kingsberry, Legal Assistant; Federal Trade Commission, Premerger Notification Office, Bureau Of Competition, Room H-303, Washington, DC 20580. (202) 326-3100.

By Direction of the Commission.  
**Donald S. Clark,**  
Secretary.

(FR Doc. 2013-01183 Filed 1-23-13; 8:45 am)  
BILLING CODE 6750-01-M

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**Office of the Secretary**

**Annual Update of the HHS Poverty Guidelines**

**AGENCY:** Department of Health and Human Services.

**ACTION:** Notice.

**SUMMARY:** This notice provides an update of the Department of Health and Human Services (HHS) poverty guidelines to account for last calendar year's increase in prices as measured by the Consumer Price Index.

**DATES:** *Effective Date:* January 24, 2013, unless an office administering a program using the guidelines specifies a different effective date for that particular program.

**ADDRESSES:** Office of the Assistant Secretary for Planning and Evaluation, Room 404E, Humphrey Building, Department of Health and Human Services, Washington, DC 20201.

**FOR FURTHER INFORMATION CONTACT:** For information about how the guidelines are used or how income is defined in a particular program, contact the Federal, state, or local office that is responsible for that program. For information about poverty figures for immigration forms, the Hill-Burton Uncompensated Services Program, and the number of people in poverty, use the specific

telephone numbers and addresses given below.

For general questions about the poverty guidelines themselves, contact Kendall Swenson, Office of the Assistant Secretary for Planning and Evaluation, Room 404E, Humphrey Building, Department of Health and Human Services, Washington, DC 20201—telephone: (202) 690-7507—or visit <http://aspe.hhs.gov/poverty/index.cfm>.

For information about the percentage multiple of the poverty guidelines to be used on immigration forms such as USCIS Form I-864, Affidavit of Support, contact U.S. Citizenship and Immigration Services at 1-800-375-5283.

For information about the Hill-Burton Uncompensated Services Program (free or reduced-fee health care services at certain hospitals and other facilities for persons meeting eligibility criteria involving the poverty guidelines), contact the Office of the Director, Division of Health Facilities, Health

Resources and Services Administration, HHS, Room 10-105, Parklawn Building, 5600 Fishers Lane, Rockville, Maryland 20857. To speak to a staff member, please call (301) 443-5656. To receive a Hill-Burton information package, call 1-800-638-0742 (for callers outside Maryland) or 1-800-492-0359 (for callers in Maryland). You also may visit <http://www.hrsa.gov/getthehealthcare/affordable/hillburton/>.

For information about the number of people in poverty, visit the Poverty section of the Census Bureau's web site at <http://www.census.gov/hhes/www/poverty/poverty.html> or contact the Census Bureau's Customer Service Center at 1-800-823-8282 (toll-free) or visit <http://ask.census.gov> for further information.

**SUPPLEMENTARY INFORMATION:**

**Background**

Section 673(2) of the Omnibus Budget Reconciliation Act (OBRA) of 1981 (42 U.S.C. 9902(2)) requires the Secretary of the Department of Health and Human Services to update the poverty guidelines at least annually, adjusting them on the basis of the Consumer Price Index for All Urban Consumers (CPI-U). The poverty guidelines are used as an eligibility criterion by the Community Services Block Grant program and a number of other Federal programs. The poverty guidelines issued here are a simplified version of the poverty thresholds that the Census Bureau uses to prepare its estimates of the number of individuals and families in poverty.

As required by law, this update is accomplished by increasing the latest published Census Bureau poverty thresholds by the relevant percentage change in the Consumer Price Index for All Urban Consumers (CPI-U). The guidelines in this 2013 notice reflect the 2.1 percent price increase between calendar years 2011 and 2012. After this inflation adjustment, the guidelines are rounded and adjusted to standardize the differences between family sizes. The same calculation procedure was used this year as in previous years. (Note that these 2013 guidelines are roughly equal to the poverty thresholds for calendar year 2012 which the Census Bureau expects to publish in final form in September 2013.)

The poverty guidelines continue to be derived from the Census Bureau's current official poverty thresholds; they are not derived from the Census Bureau's new Supplemental Poverty Measure (SPM).

The following guideline figures represent annual income.

**2013 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA**

Persons in family/household	Poverty guideline
1	\$11,490
2	15,510
3	19,530
4	23,550
5	27,570
6	31,590
7	35,610
8	39,630

For families/households with more than 8 persons, add \$4,020 for each additional person.

**2013 POVERTY GUIDELINES FOR ALASKA**

Persons in family/household	Poverty guideline
1	\$14,360
2	19,380
3	24,410
4	29,440
5	34,470
6	39,500
7	44,530
8	49,560

For families/households with more than 8 persons, add \$5,030 for each additional person.

**2013 POVERTY GUIDELINES FOR HAWAII**

Persons in family/household	Poverty guideline
1	\$13,230
2	17,850
3	22,470
4	27,090
5	31,710
6	36,330
7	40,950
8	45,570

For families/households with more than 8 persons, add \$4,620 for each additional person.

Separate poverty guideline figures for Alaska and Hawaii reflect Office of Economic Opportunity administrative practice beginning in the 1966-1970 period. (Note that the Census Bureau poverty thresholds—the version of the poverty measure used for statistical purposes—have never had separate figures for Alaska and Hawaii.) The poverty guidelines are not defined for Puerto Rico or other outlying jurisdictions. In cases in which a Federal program using the poverty guidelines serves any of those jurisdictions, the Federal office that administers the program is generally responsible for deciding whether to use

the contiguous-states-and-DC guidelines for those jurisdictions or to follow some other procedure.

Due to confusing legislative language dating back to 1972, the poverty guidelines sometimes have been mistakenly referred to as the "OMB" (Office of Management and Budget) poverty guidelines or poverty line. In fact, OMB has never issued the guidelines; the guidelines are issued each year by the Department of Health and Human Services. The poverty guidelines may be formally referenced as "the poverty guidelines updated periodically in the Federal Register by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2)."

Some federal programs use a percentage multiple of the guidelines (for example, 125 percent or 185 percent of the guidelines), as noted in relevant authorizing legislation or program regulations. Non-Federal organizations that use the poverty guidelines under their own authority in non-Federally-funded activities also may choose to use a percentage multiple of the guidelines.

The poverty guidelines do not make a distinction between farm and non-farm families, or between aged and non-aged units. (Only the Census Bureau poverty thresholds have separate figures for aged and non-aged one-person and two-person units.)

Note that this notice does not provide definitions of such terms as "income" or "family," because there is considerable variation in defining these terms among the different programs that use the guidelines. These variations are traceable to the different laws and regulations that govern the various programs. This means that questions such as "Is income counted before or after taxes?", "Should a particular type of income be counted?", and "Should a particular person be counted as a member of the family/household?" are actually questions about how a specific program applies the poverty guidelines. All such questions about how a specific program applies the guidelines should be directed to the entity that administers or funds the program, since that entity has the responsibility for defining such terms as "income" or "family," to the extent that these terms are not already defined for the program in legislation or regulations.

Dated: January 18, 2013.

**Kathleen Sebelius,**

*Secretary of Health and Human Services.*

[PR Doc. 2013-01422 Filed 1-22-13; 11:15 am]

BILLING CODE 4150-05-P

Appendix S – Iron Mountain

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IRON MOUNTAIN INFORMATION MANAGEMENT, LLC

Address of Iron Mountain Branch/District Office:

FOR IRON MOUNTAIN PURPOSES ONLY	
Account Number:	NAIC'S Code:
Branch/District Cost Ctr. No.:	

Contract Effective Date: March 12, 2014

CUSTOMER: Guided Steps Compassion Center			BILLING ADDRESS (If Different):		
Street Address: 582 Barley Ct			Street or Box No.:		
City: Smyrna	State: DE	Zip + 4: 19977	City:	State:	Zip + 4:
Primary Contact and Title: Elizabeth Ford VP of Finance and Operations			Billing Contact:		
Telephone: 302.399.3557	Fax:		Telephone: dlbcphone.2	Fax:	
E-mail: ford.elizabeth1@gmail.com			E-mail:		

Iron Mountain Information Management, LLC ("Iron Mountain" or "IM") will perform the services described on schedules annexed to this Agreement, either physically or by reference (each a "Schedule"), and Customer will pay IM for such services according to the rates and provisions in the Schedules. All services will be provided subject to this Agreement, which consists of this page, the Basic Terms and Conditions, the Schedules and the Glossary of terms that can be found at <http://cic.ironmountain.com>.

**VALUE OF DEPOSITS.** Customer declares, for the purposes of this Agreement, that (a) with respect to hard-copy (paper) records, microfilm and microfiche stored pursuant to this Agreement, the value of such stored items is \$1.00 per carton, linear foot of open-shelf files, container or other storage unit, and (b) with respect to round reel tape, audio tape, video tape, film, data tape, cartridges or cassettes or other non-paper media stored pursuant to this Agreement, the value of such stored items is equal to the cost of replacing the physical media. Customer acknowledges that it has declined to declare an excess valuation, for which an excess valuation fee would have been charged.

**LIMITATION OF LIABILITY.** Iron Mountain's liability, if any, for loss or destruction of, or damage to, materials stored with Iron Mountain ("Deposits" or "Items") is limited to the value of each Deposit as described above, or as otherwise set forth herein. Iron Mountain's maximum liability with respect to services not related to storage is the amount paid by Customer for a discrete project or, if the loss is related to service of an ongoing and continuing nature, six months of fees paid by Customer for such service. Other limitations on Iron Mountain's and/or Customer's liability are set forth on the following pages.

CUSTOMER: Guided Steps Compassion Center	IRON MOUNTAIN
Individual Signing: [print name]	Individual Signing: [print name]
Signature:	Signature:
Title:	Title:
Signing Date:	Signing Date:

In order to keep Customer apprised of Iron Mountain's service offerings, new regulations that may be of interest to customers and similar information, Iron Mountain will add Customer's representative to its informational mailing list, if an email address is provided above, to receive newsletters and communications through email or postal delivery. Customer may elect to unsubscribe any time after receiving the first newsletter or communication.

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### BASIC TERMS AND CONDITIONS

(Based on terms and conditions promulgated by Professional Records & Information Services Management)

**The following terms and conditions shall apply to this Agreement.**

1. **Term.** The term of this Agreement shall commence on the date of Customer's signature or, if later, the Effective Date set forth on the first page of this Agreement. The initial term of this Agreement shall continue for one (1) year after commencement. Upon expiration of the initial term, the term will continue with automatic renewals for additional one (1) year terms, unless written notice of non-renewal is delivered by either party to the other not less than thirty (30) days prior to the expiration date. In the event that IM continues to hold Deposits after the expiration or termination of this Agreement, the terms of this Agreement shall continue to apply until all Deposits have been removed from IM's facility, except that IM may adjust rates upon thirty (30) days' written notice.
2. **Charges.** Rates and charges shall be as specified in the Pricing Schedule (Schedule A) and/or other Schedules. Rates and charges for storage and services shall remain fixed for the first year of this Agreement, and may thereafter be changed at any time by IM upon thirty (30) days' written notice. Transportation surcharges apply and change monthly without notice in accordance with IM's fuel surcharge policy, which may be found at <http://cic.ironmountain.com/fuelsurcharge/>.
3. **Storage Volume.** Customer acknowledges that the rates and charges on Schedule A have been offered by IM on the basis of Customer's agreement to maintain its storage levels with IM at no less than eighty percent (80%) of the storage levels maintained by Customer during the immediately preceding three (3) month period, excluding any Deposits destroyed by IM at Customer's request.
4. **Customer Instructions.** Customer warrants that it is the owner or legal custodian of the Deposits and has full authority to store the Deposits and direct their disposition in accordance with this Agreement. IM will perform services pursuant to the direction of Customer's agent(s) identified pursuant to IM's standards. Authority granted to any persons on standard authorization forms shall constitute Customer's representation that the identified persons have full authority to order any service, including disposal or removal of Deposits. Such orders may be given in person, by telephone or in writing (fax, email or hard-copy). Customer releases IM from all liability by reason of the destruction of materials pursuant to Customer's authorization.
5. **Operational Procedures.** Customer shall comply with IM's reasonable operational requirements, as modified from time to time, regarding cartons, carton integrity, delivery/pickup/account closing volumes, preparation for pickup, security, secure shredding protocols, access and similar matters. Extraordinary volume requests (defined as 125% of the average volume over the immediately preceding three month period) may involve additional costs, such as overtime, which Customer will pay at IM's overtime rates, provided Customer consents to such costs in advance.
6. **Force Majeure.** Neither party shall be liable for delay or inability to perform caused by acts of God, governmental actions, labor unrest, acts of terrorism, riots, unusual traffic delays or other causes beyond its reasonable control.
7. **Governmental Orders.** IM is authorized to comply with any subpoena or similar order related to the Deposits, at Customer's expense, provided that IM notifies Customer promptly upon receipt thereof, unless such notice is prohibited by law. IM will cooperate with Customer's efforts to quash or limit any subpoena, at Customer's expense.
8. **Confidentiality.** "Confidential Information" means any information (i) contained in the Deposits, (ii) concerning or relating to the property, business and affairs of the party disclosing such information that is furnished to the receiving party, and (iii) regarding this Agreement, its Schedules and IM's processes and procedures; except for information that was previously known to the receiving party free of any obligation to keep it confidential, is subsequently made public by the disclosing party or is disclosed by a third party having a legal right to make such disclosure. Confidential Information shall be used only in the manner contemplated by this Agreement and shall not be intentionally disclosed to third parties without the disclosing party's written consent. IM shall not obtain any rights of any sort in or to the Confidential Information of Customer contained in Deposits. IM shall implement and maintain reasonable safeguards designed to protect Customer's Confidential Information.
9. **Limitation of Liability.**
  - a. **Liability for Loss or Damage to Deposits.** IM shall not be liable for any loss or destruction of, or damage to, Deposits, including costs resulting from a loss of a Deposit constituting a breach of data security or confidentiality, unless such loss or damage resulted from IM's negligence. If liable, the amount of IM's liability is limited as provided on the first page hereof. Deposits are not insured by IM against loss or damage, however caused. Customer may insure Deposits through third-party insurers for any amount. Customer shall cause its insurers of Deposits to waive any right of subrogation against IM. If Deposits are placed in the custody of a third-party carrier for transportation, the carrier shall be solely responsible for any loss or destruction of, or damage to, such Deposits while in the custody of the carrier.

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- b. **Liability for Non-Storage Services.** With respect to services not related to the storage of Deposits, IM shall not be liable for any loss or default unless such loss or default is due to the negligence of IM. If liable, the amount of IM's liability is limited as provided on the first page hereof. IM shall not be liable for the loss of contents of shredding bins unless and until the contents are in the custody and control of IM.
- c. **No Consequential Damages.** In no event shall either party be liable for any consequential, incidental, special or punitive damages, or for loss of profits or loss of data, regardless of whether an action is brought in tort, contract or under any other theory.
10. **ITAR/EAR Compliance.** Customer represents that none of the Deposits stored by Iron Mountain pursuant to this Agreement require protection from access by foreign persons because they contain technical information regarding defense articles or defense services within the meaning of the International Traffic in Arms Regulations (22 CFR 120) or technical data within the meaning of the Export Administration Regulations (15 CFR 730-774). If any of Customer's Deposits do contain any such information, Customer shall notify Iron Mountain of the specific Deposits that contain such information and acknowledges that special storage and service rates shall apply thereto.
11. **Non-Custodial Status.** Unless Iron Mountain shall have explicitly agreed in writing, Iron Mountain's performance of services shall not cause Iron Mountain to be deemed a "custodian" of the records or "designee" of Customer under state or federal law with respect to such records.
12. **Notice of Claims.** Claims by Customer must be presented in writing within a reasonable time, in no event longer than ninety (90) days after delivery or return of the Deposits to Customer, or ninety (90) days after Customer is notified of loss, damage or destruction to part or all of the Deposits.
13. **Notice of Loss.** When Deposits have been lost, damaged or destroyed, Iron Mountain shall, upon confirmation of the event, report the matter in writing to Customer.
14. **Payment Terms.** Payment terms are net, thirty (30) days. Customer shall be liable for late charges totaling one percent (1%) per month of the outstanding balance. Prior to delivery of Deposits upon expiration, termination, or substantial withdrawal, IM may require payment by certified check.
15. **Customer Default.** If Customer fails to pay IM's charges (other than disputed charges) within sixty (60) days after the date of an invoice, IM may suspend service. If Customer fails to pay IM's charges (other than disputed charges) for six (6) months or longer, IM may securely destroy Deposits, provided IM shall have provided ninety (90) days' written notice to Customer; Customer shall pay IM's standard price for such secure destruction. A final notice will be sent to Customer ten (10) days prior to secure destruction of the Deposits. IM shall have other rights and remedies as may be provided by law. In the event IM takes any actions pursuant to this Section, it shall have no liability to Customer or anyone claiming by or through Customer.
16. **Termination.** Either party may terminate this Agreement upon written notice to the other party in the event that the other party shall have breached any of its material obligations hereunder and shall not have cured such default within forty-five (45) days after written notice of such default, subject to the fees set forth in the applicable Schedule(s).
17. **Safe Materials and Premises.** Customer shall not store with IM or place in shredding bins any material that is highly flammable, may attract vermin or insects, or is otherwise dangerous or unsafe to store or handle, or any material that is regulated by federal or state law or regulation relating to the environment or hazardous materials. Customer shall not store negotiable instruments, jewelry, check stock or other items that have intrinsic value. Customer warrants that it shall only place paper-based materials in the shredding bins. Customer shall reimburse IM for damage to equipment or injury to personnel resulting from Customer's breach of this warranty.
18. **Purchase Orders.** In the event that Customer issues a purchase order to IM covering the services provided under this Agreement, any terms and conditions set forth in the purchase order which are in addition to or establish conflicting terms and conditions to those set forth in this Agreement are expressly rejected by IM.
19. **Miscellaneous.** IM may subcontract its obligations under this Agreement, in whole or in part, to an affiliate. Neither party may assign this Agreement in whole or in part, except to an affiliate, without the prior written consent of the other party. An affiliate means any entity controlling, controlled by, under common control with, or having a common parent with IM or Customer. Any notice made pursuant to this Agreement may be given in writing at the addresses set out on the first page hereof until written notice of a change of address has been received. Notices to IM shall be sent to the attention of its General Manager. IM may exercise all rights granted to warehousemen by the Uniform Commercial Code as adopted in the state where the Deposits are stored. In the event of inconsistency between these Basic Terms and Conditions and a Schedule, the Basic Terms and Conditions shall prevail as to the services covered thereby. This Agreement shall be governed by the laws of the state in which Customer's office identified in this Agreement is located except for conflicts of laws principles.



## Schedule A: PROGRAM PRICING SCHEDULE

### Records Management Value Package

This Records Management Value Package Pricing Schedule is incorporated into and made part of the Customer Agreement ("Agreement") between Iron Mountain Information Management, LLC, (the "Company" or "Iron Mountain") and Guided Steps Compassion Center (the "Customer").

Please see our Customer Information Center at [cic.ironmountain.com](http://cic.ironmountain.com) for a Glossary with definitions of the terms used in this Pricing Schedule and more detail regarding our services, standard processes, and billing practices. In addition, restrictions apply to volume and/or stated timeframes for some service transaction types and these may be found in the Glossary under each service type.

This Records Management Value Package Pricing Schedule supersedes and terminates any prior Pricing Schedule and/or Schedule A existing between Iron Mountain and the Customer for the accounts noted below. All other services not specifically listed on this Schedule A will be charged at Iron Mountain's then current rates.

Guided Steps Compassion Center

District Name/Number: | Customer No.

Effective Date: March 12, 2014



### Program Fee

<p>\$ 89 /month</p> <p>x Value Package 100</p>	<p>In consideration for the Customer's payment of a monthly program fee of \$ 89 ("Program Fee"), Iron Mountain agrees to provide the services listed as included within this Schedule A ("Standard Service Transactions"). A 30 day "no charge" grace period from Agreement signature to program startup will be provided, with Program Fee billed in advance commencing in the following month.</p>
<p>Value Package 300</p>	<p>See <i>Pricing for Core Services</i> and <i>Custom Pricing</i> for detail on the specific services included within your monthly program. Services not listed as included will be billed at the rates listed within this Schedule A.</p> <p>Customer volume growth or reduction may result in transition and pricing adjustment from one Value Package to another, and some or all of the volume tiers for the Value Packages may be adjusted annually.</p>

DESCRIPTION (STORAGE/SHRED ONLY)	PRICE	PER
<ul style="list-style-type: none"> <li>■ "Records Management Value Package 100"</li> </ul> <p>Up to 100 cubic feet of storage and 2 Shred Containers serviced monthly (offsite)</p>	\$89.00	Month
<ul style="list-style-type: none"> <li>■ "Records Management Value Package 300"</li> </ul> <p>Up to 300 cubic feet of storage and 2 Shred Containers serviced monthly (offsite)</p>	\$139.00	Month

Changes to rates for the Program Fee as well as for other available services shall remain subject to the basic terms defined in the Agreement.

Iron Mountain will review Customer's storage volume periodically. If the Customer's storage volume exceeds the amount for the selected Value Package, Iron Mountain will increase the Monthly Program Fee to the fee listed for the appropriate Value Package. Should Customer's inventory volume increase to volume higher than the "Value Package 300" volume of 300 cubic feet, Iron Mountain will transition the account to Iron Mountain's standard pricing structure for those services ("Ala Carte Program") and a new Schedule A to reflect those prices, which shall be at Iron Mountain's then standard List Prices minus 20%.



### Pricing for Core Services

STANDARD STORAGE AND SERVICES (see <a href="http://cic.ironmountain.com/records/glossary">http://cic.ironmountain.com/records/glossary</a> for service definitions)		
DESCRIPTION	EFFECTIVE PRICE	UNIT
■ Carton Storage	Included	Cubic Feet
■ Receiving and Entering - Carton	\$3.21	Cubic Feet
■ Regular Retrieval - Carton	\$4.15	Cubic Feet
■ Regular Retrieval - File from Carton	\$5.57	File
■ Regular Refile - Carton	\$4.15	Cubic Feet
■ Regular Refile - File to Carton	\$5.57	File
■ Archival Destruction - Carton	\$5.02	CF plus Regular Retrieval
■ Permanent Withdrawal - Carton	\$6.27	CF plus Regular Retrieval
■ Permanent Withdrawal - File from Carton	\$3.02	File plus Regular Retrieval
■ Next Day Delivery	\$39.47	Visit, Plus Handling
■ Regular Pickup	\$39.47	Visit, Plus Handling
■ Handling Charge	\$3.64	Cubic Feet
■ Off-Site Secure Shredding	\$15.00	Container*

\*The per Container rate for Off-Site Secure Shredding applies only to those Containers in excess of the number included in the selected Records Management Value Package.

PREMIUM STORAGE AND SERVICES (see <a href="http://cic.ironmountain.com/records/glossary">http://cic.ironmountain.com/records/glossary</a> for service definitions)		
DESCRIPTION	EFFECTIVE PRICE	UNIT
■ Rush Retrieval - Carton	\$6.21	Cubic Feet
■ Rush Retrieval - File from Carton	\$8.28	File
■ Regular Interfile - Carton	\$7.56	Cubic Feet
■ Half Day Delivery	\$54.52	Transportation Visit plus Handling
■ Rush Delivery - Business Day	\$109.02	Transportation Visit plus Handling
■ Rush Delivery - Weekends/Holidays/After Hours	\$218.05	Transportation Visit plus Handling
■ Archival Destruction - File from Carton	\$4.73	File plus Regular Retrieval
■ Miscellaneous Services - Labor	\$56.21	Hour
■ Photocopy Services	\$ .82	Page
■ Fax Services	\$2.84	Page
■ Re-Boxing Charge	\$5.68	Labor plus New Carton
■ Image on Demand (IOD) Retrieval - Standard*	\$25.00	Entire files up to 50 pages
■ Image on Demand (IOD) Retrieval - Premium *	\$ .25	Per image over 50 pages

- Other premium IOD services requiring separate quote include Optical Character Recognition (OCR), manually keyed indexing, abstract file search/scan, special file delivery (FTP), and Rush service levels



OTHER PROGRAM FEES (see <a href="http://cic.ironmountain.com/records/glossary">http://cic.ironmountain.com/records/glossary</a> for service definitions)		
DESCRIPTION	EFFECTIVE PRICE	UNIT
■ Administrative Fee (Summary Billing)	Included	Account ID per Month
■ Administrative Fee (Detailed Billing)	Included	Account ID per Month
■ Fuel Surcharge		Transportation Vist*

\*Fuel Surcharges are only applicable for Transportation Services not included within your monthly Program Fee. A Fuel Surcharge is applied monthly based upon changes in the price of diesel fuel as published by the US Department of Energy. This charge is calculated monthly and included as a percentage of transportation related service charges. The current monthly Fuel Surcharge information can be found at <http://cic.ironmountain.com/FuelSurcharge>.

### Custom Pricing

CUSTOM STORAGE AND SERVICES (see <a href="http://cic.ironmountain.com/records/glossary">http://cic.ironmountain.com/records/glossary</a> for service definitions)		
DESCRIPTION	EFFECTIVE PRICE	UNIT
■ Initial Move - Carton	No Charge	
■ Initial Move - Individual Listing	\$0.62	File
■ Initial Move - Labor	\$ 54.05	Hour
■ Individual Listing	\$0.62	File
■ Carton Supplies – Standard Letter/Legal	\$3.49	Each
■ Carton Supplies – Auto-Fold Letter/Legal	\$4.77	Each
■ Carton Supplies – Deluxe Letter/Legal	\$4.95	Each
■ Carton Supplies – Letter Transfer	\$6.02	Each
■ Carton Supplies – Legal Transfer	\$7.14	Each
■ Carton Supplies – Check	\$2.95	Each
■ Carton Supplies – X-ray	\$3.95	Each
■ Storage Minimum	Not applicable	
■ Minimum Service Order Charge	\$14.20	Each*

\*Minimum Service Order Charge is only applicable for requested services not included within your monthly Program Fee.

Any additional Records Management and/or Secure Shredding services not listed above will be billed at then current List Prices.

Initial Move prices apply for the Initial Move services listed above for Items received by Iron Mountain during the startup process (Initial Move) for this new Records Management Value Package and shall apply to all initial storage volume received by Iron Mountain within three (3) months of the Effective Date of this Schedule A.



**Appendix T – Standard Operating Procedures**

	Document Identifier	Version	Effective Date
	SOP 100	0.1	DD MMM YYYY

**Note: ALL SOPs will be updated once Guided Steps Compassion Center has been established, and procedures have been further defined and documented.**

# Standard Operating Procedures

DRAFT

73 Artisan Drive Smyrna, DE 19977 (302)653-####	<Insert website address>
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1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT



**2. Approvals**

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
_____ <b>Signature</b>	_____ <b>Date (DD-MMM-YYYY)</b>
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
_____ <b>Signature</b>	_____ <b>Date (DD-MMM-YYYY)</b>

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SOP 100: Standard Operating Procedures

**3. Purpose**

The purpose of this document is to ensure consistency across all Guided Steps Compassion Center Standard Operating Procedures (SOPs) in providing detailed instructions for the:

- Creation of new SOPs, format and deviations
- SOP annual review process
- Retirement of SOPs
- Maintenance of SOPs
- Storage of SOPs

**4. Scope**

This SOP applies to all Guided Steps Compassion Center employees.

**5. Related Forms and SOPs**

1. SOP Template

**6. Definitions**

TERM	DEFINITION
SOPs	<p>Standard Operating Procedures:</p> <ul style="list-style-type: none"> <li>• Enterprise-specific documents that record day-to-day activities performed in the work environment.</li> <li>• Describe steps to complete individual procedures.</li> <li>• Define repeatable, auditable, and concrete business processes.</li> <li>• Identify enterprise systems and how systems work together.</li> <li>• Combine to form a comprehensive management system.</li> </ul>

**7. Procedure**

Procedures for the creation, annual review, retirement, maintenance, and storage of SOPs are described below.

**7.1 Creating New SOPs**

- Once the need for a new SOP has been identified, the Requestor will create a draft SOP and submit it to Executive Management.
- Executive Management will review the proposed SOP to determine if the new SOP is warranted.
  - If new SOP is rejected, Executive Management will notify Requestor of reason(s) for SOP not being approved. Executive Management
  - If approved, Executive Management Executive Management will return the draft SOP to the Requestor for any necessary revisions.
- Requestor will make any necessary updates, and submit the final version to Executive Management for approval.
- Executive Management will obtain approval from Management to proceed with the new SOP.
- After SOP is fully approved, Executive Management will:
  - File the original documents in the SOP binder.
  - Store the electronic version in the SOP repository.
  - Update the SOP inventory list and applicable training documents.
- Training on the new SOP is scheduled before the SOP Effective Date.

## 7.2 Annual Review of SOPs

SOPs are reviewed by the responsible department manager on a bi-annual basis (every 2 years).

The review process is as follows:

- The responsible department manager reviews the SOP to determine if updates are needed.
  - If no changes are required, the SOP Inventory list is updated to show the latest review date.
  - If updates are required, the responsible department manager will submit an email detailing the changes being requested to Executive Management
  - Executive Management will route to Management for approval.
    - If Management rejects the changes requested, the existing SOP will remain in effect.
      - Responsible department manager will be advised of the reason(s) the request is not approved.
    - If the request is approved, the responsible department manager will update the SOP, and obtain Management sign-off.
    - Executive Management will perform the following tasks:
      - File the new version of document in the SOP binder
      - Archive the previous version of the document
      - Update the SOP inventory list
      - Update any training documents if applicable
- The responsible department manager will conduct staff training as applicable.

## 7.3 Maintenance of SOPs

If staff members identify a SOP change, they will submit an email detailing the changes to Executive Management or the responsible department manager in which the process outlined in Section 7.2 (*Annual Review of SOPs*) is then followed.

If the request requires the retirement of an SOP, the process outlined in Section 7.4 (*Retirement of SOPs*) is followed.

## 7.4 Retirement of SOPs

- If a SOP is determined to no longer be applicable, Executive Management will submit an email detailing the changes to Management.
- Management will review the changes requested.
  - If Management rejects changes, the existing SOP will remain in effect, and the Requester is advised of the reason(s) the request was not approved.
  - If Management approves the changes, Executive Management will do the following:
    - Retire/archive the original SOP
    - Update the SOP Inventory List
    - Update training documents if applicable

## 7.5 Archiving of SOPs

- The original signed SOPs and supporting forms are stored in binders and filed numerically in the Guided Steps Compassion Center SOP library.
- Any retired SOP documentation is archived.
- Electronic copies of SOPs and supporting documents are maintained in the SOP repository on the Guided Steps Compassion Center production server.



SOP 100: Standard Operating Procedures

**8. SOP Approval**

The minimum approval level for any SOP is Vice President.

**9. SOP Effective Dates**

- Each SOP will have an effective date.
- All personnel are expected to complete training and sign-off on all applicable SOPs by the effective date.
- The author will provide 30 days between the release of the SOP and the Effective Date of the SOP so that training may occur.
- New employees must be trained and provide sign-off on all applicable SOPs within 30 days of hire date.

**10. Records**

The original signed copy of this document is stored in the SOP 100: Standard Operating Procedures binder, as well as an electronic version stored in the Guided Steps Compassion Center electronic SOP repository.

DRAFT

	Document Identifier	Version	Effective Date
	SOP 101	0.1	DD MMM YYYY
<h1>Employee Training and Development</h1> <p><i>DRAFT</i></p>			
73 Artisan Drive Smyrna, DE 19977 (302)653-####		<Insert website address>	

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DRAFT

1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT

**3. Overview**

The purpose of this document is to outline Guided Steps Compassion Center's requirements for conducting employee training to ensure all personnel have sufficient training to effectively perform their job functions.

Areas of training include:

- Company SOPs
- Applicable governmental regulations
- Technical training
- Courses applicable to job functions

**4. Scope**

This procedure applies to all Guided Steps employees.

**5. Related Forms**

1. SOP Acknowledgement Form
2. Training Record

**6. Definitions**

TERM	DEFINITION
<b>Management</b>	Refers to all senior personnel at Guided Steps: President and Vice Presidents

**7. Procedure**

**7.1. Employee Training**

The need for training may arise for a number of reasons, such as:

- SOP updates
- New SOPs
- New responsibilities
- New technology
- Career development
- New state and/or federal laws and/or regulations pertaining to medical marijuana

Once the need for training has been identified, Management will:

- Schedule the training
- Notify staff required to attend
- Create the employee training records

In the case of SOP or internal training, both the training attendees and instructor will sign any training forms.

For external training, the attendee will provide a training certificate indicating successful completion of the course.

Management will collect any signed forms or training certificates and file them in the employee's personnel file.

**8. Records**

The original signed copy of this document is stored in the SOP 101: Employee Training and Development binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.





Training Record	
Date of Training	Title of Training
Attendee Name	
Company	
Instructor	
Description	
Attendee Signature	Date (DD/MMM/YYYY)
Instructor Signature	Date (DD/MMM/YYYY)

DRAFT

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	Document Identifier	Version	Effective Date
	SOP 103	0.1	DD MMM YYYY
<h1>Visitors</h1> <p style="font-size: 48px; opacity: 0.3; transform: rotate(-30deg); position: absolute; top: 50%; left: 50%; pointer-events: none;">DRAFT</p>			
<p>73 Artisan Drive Smyrna, DE 19977 (302)653-####</p>		<p>&lt;Insert website address&gt;</p>	

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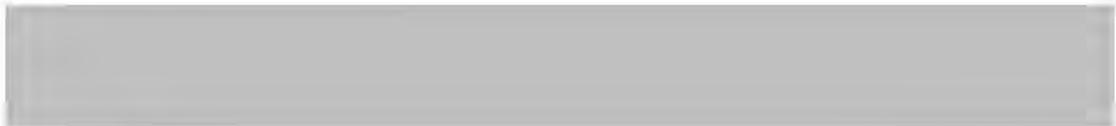
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DRAFT

1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT



2. Approvals

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____



SOP 103: Visitors

**3. Overview**

The purpose of this document is to provide guidelines for meeting and hosting visitors at Guided Steps Compassion Center to ensure they are signed in and accompanied accordingly while on-site.

**4. Scope**

This SOP applies to all Guided Steps employees meeting with or hosting visitors on-site.

**5. Related Forms**

1. Visitor Log
2. Incident Report

**6. Definitions**

There are no terms to be defined in this SOP.

**7. Procedure**

**7.1. Visitor Guidelines**

**7.1.1. Normal Business Hours**

- During the normal business hours of 9:00AM and 6:00PM, visitors will be greeted in the Guided Steps reception area.
- Service personnel will be guided at the discretion of the Office Manager or Management.

**7.1.2. After Normal Business Hours**

- Special arrangements will be made for visitors to be on site after 6:00PM.
- Guided Steps staff will be on-site during the entire visit.

**7.2. Visitor Procedure**

- Visitors must check in at the Guided Steps Security Desk and sign the Visitor Log upon arriving at the compassion center.
- Visitors will proceed to the reception area and check in with the Receptionist.
- Receptionist will notify the hosting individual whom the visitor(s) is scheduled to meet with.
- The Host will meet visitor(s) in the reception area and escort them to designated meeting place.
- Host will accompany visitor(s) at all times (except rest room) while on premises.
- At conclusion of visit, the Host will escort visitor(s) to the Security Desk.
- Visitor(s) must sign the Visitor Log prior to leaving the compassion center.

**7.3. Visitor Procedure Violation**

- Visitor procedure violations will immediately be reported to the Office Manager or Management.
- Office Manager or Management will notify authorities if necessary.
- Office Manager or Management will complete an Incident Report.
- Management will determine escalation level based on severity of the incident.
  - Potential action steps:
    - Appropriate parties notified
      - (i.e. vendor/client company, police)
    - Visitor escorted from premises

**8. Records**

The original signed copy of this document is stored in the SOP 103: Visitors binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.





INCIDENT REPORT			
Incident Details			
Date	<input type="text"/>	Initiator Name	<input type="text"/>
Incident Severity (Check One)	<input type="checkbox"/>	<b>CRITICAL</b>	<input type="checkbox"/>
		<b>MAJOR</b>	<input type="checkbox"/>
		<b>MINOR</b>	<input type="checkbox"/>
Incident Discovery	Who Discovered	<input type="text"/>	
	Date/Time Occurred	<input type="text"/>	
	Date/Time Discovered	<input type="text"/>	
	Personnel Involved	<input type="text"/>	
Description of Incident		Incident Team Assigned	
<input type="text"/>		<input type="text"/>	
Resolution			
Date Incident Resolved	<input type="text"/>		
Resolution Details	<input type="text"/>		
Comments			
<input type="text"/>			
APPROVALS			
Requestor	<input type="text"/>	Date	<input type="text"/>
Manager	<input type="text"/>	Date	<input type="text"/>

	Document Identifier	Version	Effective Date
	SOP 104	0.1	DD MMM YYYY
<h1>Audits</h1> <p><i>DRAFT</i></p>			
73 Artisan Drive Smyrna, DE 19977 (302)653-####		<Insert website address>	



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DRAFT

1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT



SOP 104: Audits

2. Approvals

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
_____	_____
Signature	Date (DD-MMM-YYYY)
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
_____	_____
Signature	Date (DD-MMM-YYYY)

DRAFT

**3. Overview**

The purpose of this procedure is to describe the requirements for conducting internal and vendor audits. The objectives of this SOP are to ensure Guided Steps Compassion Center:

1. Compliance with its own SOPs and applicable regulations.
2. Audits are conducted effectively and efficiently.
3. Produce documents and information required in internal and external audits.
4. Audit issues identified are resolved in a timely manner.

**4. Scope**

This procedure applies to Guided Steps employees who are responsible for or involved in internal audits.

**5. Related Forms**

1. Internal Audit Checklist
2. Audit Outcome Report
3. Internal Audit Log

**6. Definitions**

TERM	DEFINITION
DHSS	Delaware Health and Social Services
Quality Council	<p>A committee reporting to the Guided Steps Quality Council Chairman, an independent board director, and assists the board and the company in the following areas:</p> <ul style="list-style-type: none"> <li>• Overseeing and assuring adherence to State of Delaware and Federal laws and legislation of medical marijuana.</li> <li>• Ensuring business integrity, as well as employee, volunteer, patient, and caregiver safety.</li> <li>• Quality company processes, services, and products.</li> </ul>

**7. Procedure**

**7.1. Internal Audits**

Guided Steps Compassion Center Management will:

- Conduct internal audits on a **monthly** basis.
- With the help of Management and the Quality Council, plan and determine the focus of each Internal Audit.
  - Internal audits may focus on one or multiple topics.
- Record the internal audit date, topic, and other summary information in the Internal Audit Log.
- Complete the applicable sections of the Internal Audit Checklist for any topics being audited.
  - It is not required that the auditor complete the entire form.
  - In addition, the auditor may add section and/or questions to audit checklist.
- Generate an Audit Outcome Report using and provide to management within 3 business days of audit completion.
- Work with Management to develop and complete any corrective action plans as necessary.

Results of Internal Audits are considered **confidential**, and will only be shared with verified DHSS auditors.

#### 7.2. Hosting Audits

Upon arrival, the auditor(s) will:

- Check in with Security and sign the Visitor Log (*Reference SOP 103: Visitors*).
- Upon clearance, the auditor(s) will proceed into reception area and check in with the Receptionist.
- Receptionist will notify Management of auditor(s) arrival.
- The appropriate manager will meet auditor(s) in the reception area.
- Host will accompany auditor(s) at all times (except rest room) while on premises.
- At conclusion of visit, the Host will escort auditor(s) to the Security Desk.
- Auditor(s) must sign the Visitor Log prior to leaving the compassion center.

Upon completion of audit:

- Auditor(s) should supply manager a preliminary report of findings.
- Manager will discuss outcome of audit with Executive Management.
  - Outcome will be discussed at next scheduled Board of Directors meeting.
- Initiate CAPA if necessary (*Reference SOP 106: CAPA*).

#### 8. Records

The original signed copy of this document is stored in the SOP 104: Audits binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.



INTERNAL AUDIT CHECKLIST							
Date of Internal Audit							
Auditor(s)							
COMPANY BACKGROUND							
1.	Are detailed organizational charts available?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
2.	What is the company's customer profile?						
Comments							
3.	Can company provide any customer references?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
EMPLOYEES/VOLUNTEERS							
1.	Number of employees:						
Comments							
2.	All compassion center personnel have passed background checks?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
3.	Background checks are conducted annually?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
4.	Does company have any staff training programs and plans?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
5.	Does company have employee training records?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Comments							
6.	Does training include:						
	Job description	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
	Qualifications	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
	Employment history	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
	Training received while employed with company	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
	Experienced gained while employed with company	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
	List of company procedures relevant to employee's position	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>
Record of procedures employee has been trained on	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>	
Comments							
QUALITY CONTROL PROCESSES							
1.	Does company have documents describing how to perform various activities related to the scope of the audit?	<input type="checkbox"/> Y	<input type="checkbox"/>	<input type="checkbox"/> N	<input type="checkbox"/>	<input type="checkbox"/> N/A	<input type="checkbox"/>

Internal Audit Checklist

Version 0.1

Comments						
2.	Is there a defined process and procedure for managing the company's procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
Do the procedures cover all areas of interest:						
3.	Growing, Cultivation & Disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Testing Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Quality Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Inventory Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
4.	Is there a corrective and preventive action process?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
5.	Is there an internal audit process?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
6.	Is there a process for managing vendors?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Are critical vendors audited:						
7.	Computer hosting facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Electronic data storage vendors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Paper storage vendors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Other:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments						
<b>SECURITY</b>						
1.	Is access to the building controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
2.	Is access to the Grow Room controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
3.	Is access to the Cultivation Room controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
4.	Is access to the Medicine Room controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
5.	Is access to the Safe Room/Vault controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
6.	Is access to the Dispensary controlled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						
7.	Are fire protection mechanisms in place?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Comments						

Internal Audit Checklist

Version 0.1

8.	Are recovery procedures defined and tested?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
9.	Are computer access rights managed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
10.	Is there protection against computer viruses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
11.	Is there protection against unauthorized access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
<b>BUSINESS CONTINUITY/DISASTER RECOVERY PLAN</b>							
1.	Business Continuity/Disaster Recovery Plan in place, tested, and results documented	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
2.	What redundancy is built into the computer infrastructure? (e.g. clustered servers, RAID arrays, dual independent internet connections)						
Comments							
3.	What provisions are there to prevent disruption of power to the computer facilities? (e.g. Uninterruptable Power Supplies, Back-up generator)						
Comments							
4.	Is there a secure dedicated server room with temperature control?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
5.	Is there a back-up site for computer facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
6.	Is there a back-up site for office facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
7.	Where is back-up data/media stored?						
Comments							
8.	Has the electronic data storage company been audited?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							
9.	Where are paper archives and records stored?						
Comments:							
10.	What is the record retention policy?						
Comments:							
11.	Has the paper storage vendor been audited?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comments							

Internal Audit Checklist

Version 0.1

MISCELLANEOUS			
1.	All documents identified in questionnaire available for review	Y <input type="checkbox"/>	N <input type="checkbox"/> N/A <input type="checkbox"/>
Comments			
2.	Other areas of concern		
Comments			
3.	General comments		
Comments			
LEAD AUDITOR			
I have inspected the content of this checklist and have found no errors or omissions substantive enough to prohibit use.			
Name			
Title			
Signature		Date (DD-MMM-YYYY)	
AUDITOR			
I have inspected the content of this checklist and have found no errors or omissions substantive enough to prohibit use.			
Name			
Title			
Signature		Date (DD-MMM-YYYY)	



AUDIT OUTCOME REPORT	
Auditor	Audit Date
General Comments/Observations	
<p>Examples:</p> <ul style="list-style-type: none"> <li>• Unsecured areas</li> <li>• Incomplete reports</li> <li>• Inadequate packaging</li> </ul>	
Other Areas of Concern	
Comments	
Manager Name	Title
Signature	Date (DDMMYY)



	Document Identifier	Version	Effective Date
	SOP 105	0.1	DD MMM YYYY
<h1>Incident Reporting</h1> <p><i>DRAFT</i></p>			
73 Artisan Drive Smyrna, DE 19977 (302)653-####		<Insert website address>	

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DRAFT

1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT

2. Approvals

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
_____	_____
Signature	Date (DD-MMM-YYYY)
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
_____	_____
Signature	Date (DD-MMM-YYYY)

**3. Overview**

The purpose of this procedure is to describe the process for handling the occurrence of Guided Steps Compassion Center's employee, vendor, visitor, volunteer, patient and/or care giver generated incidents, which can originate for any number of reasons including, but not limited to building security, training, and audit findings. The objectives of this SOP are to:

1. Ensure incidents are dealt with and resolved efficiently, and are properly documented.
2. Provide a structured process enabling incidents to be reported, assessed, corrected, and prevented in the future.

**4. Scope**

This SOP applies to all Guided Steps employees.

**5. Related Forms**

1. Incident Report
2. Incident Report Log

**6. Definitions**

TERM	DEFINITION
Incident	Incidents are physical in nature, affecting approved SOPs and company policies. Examples: <ul style="list-style-type: none"> <li>• Unauthorized visitor(s)</li> <li>• Office break-in</li> <li>• SOP Violations</li> <li>• Customer Complaint</li> <li>• External DNS outage natural disaster</li> </ul>
Corrective Actions	The action and/or steps utilized to correct the incident.
Preventative Action	Any action initiated to prevent a problem from occurring or recurring.

**7. Procedure**

**7.1. Incident Reports**

Guided Steps Compassion Center staff will report incidents to Management immediately.

Management will:

- Immediately report the incident to other managers and staff to ensure awareness.
- Determine the appropriate action steps to be taken, which include but are not limited to:
  - Notify Security to escort individual from the premises.
  - Address/correct SOP violation.
- Upon incident resolution, notify managers/staff of the outcome.
- Complete an Incident Report within 24 hours of the incident.
- Add incident to the Incident Report Log.
- File the original signed Incident Report in the Incident binder.
- File an electronic copy of the Incident Report in the Guided Steps electronic repository.

**7.2. CAPAs**

Incident Reports may also initiate CAPAs (See SOP 106: CAPA for details).

Examples of incidents which may lead to CAPAs:

- Critical audit findings
- Frequent occurrences of similar incidents
- The root cause or the extent of the incident is unknown.

**8. Records**

The original signed copy of this document is stored in the SOP 105: Incident Reporting binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.



INCIDENT REPORT			
Incident Details			
Date		Initiator Name	
Incident Severity (Check One)	<input type="checkbox"/>	CRITICAL	<input type="checkbox"/>
		MAJOR	<input type="checkbox"/>
		MINOR	<input type="checkbox"/>
Incident Discovery	Who Discovered		
	Date/Time Occurred		
	Date/Time Discovered		
	Personnel Involved		
Description of Incident		Incident Team Assigned	
Resolution			
Date Incident Resolved			
Resolution Details			
Comments			
APPROVALS			
Requestor		Date	
Manager		Date	



Incident Report Log						
Initiator Name	Date Occurred	Incident Severity	Description	Date Resolved	Resolution Details	Initials

DRAFT

	Document Identifier	Version	Effective Date
	SOP 106	0.1	DD MMM YYYY
<h1>CAPA</h1> <p><i>DRAFT</i></p>			
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SOP 106: CAPA

1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT



SOP 106: CAPA

**2. Approvals**

Author	
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<Name> <Title>	
_____	_____
<b>Signature</b>	<b>Date (DD-MMM-YYYY)</b>
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
_____	_____
<b>Signature</b>	<b>Date (DD-MMM-YYYY)</b>



SOP 106: CAPA

**3. Purpose**

The purpose of this procedure is to describe the process of how corrective and preventative actions ("CAPA") are initiated, processed, and documented at Guided Steps Compassion Center ("Guided Steps") to help maintain the highest level of quality and service for our patients.

**4. Scope**

This SOP applies to all Guided Steps Compassion Center staff when dealing with corrective and preventative actions.

**5. Related Forms**

1. CAPA Report
2. CAPA Report Log

**6. Definitions**

TERM	DEFINITION
CAPA	Corrective and Preventive Actions

**7. Procedure**

A CAPA is initiated when a project, process, or system non-conformity (internal or external) to Guided Steps results in a failure to comply with specification requirements or SOP; when the effective application of preventive measures can avoid future occurrence of product, process, or system non-conformities and/or failures.

A CAPA may be initiated by any number of reasons, including but not limited to the following:

- Incident reports
- Product complaints
- Documentation errors
- External and internal audit observations
- Product reviews
- Regulatory issues
- Any issues which require mid-term and long-term corrective or preventative action, with formal tracking and documentation

**7.1. Documenting CAPAs**

**7.1.1. Initiating CAPAs**

Executive Management will:

- Initiate a CAPA by completing the CAPA Initiation section of the CAPA Report;
- Record the CAPA in the CAPA Report Log.

**7.1.2. Root Cause Analysis**

Responsible manager will:

- Assess and determine the root cause;
- Complete the Root Cause Analysis section of the CAPA Report.

**7.1.3. Corrective/Preventive Action Plan**

Responsible manager will:

- Develop a plan to implement the corrective or preventive action(s);
- Complete the Corrective/Preventive Action Plan section of the CAPA Report.

#### 7.1.4. Closing CAPAs

When all phases of the CAPA process have been satisfied through documented interaction and it is verified that the CAPA process and effectiveness of the CAPA have been verified, responsible manager:

- Close the CAPA by completing the Closeout section of the CAPA Report;
- Update the CAPA Report Log;
- File a paper copy of the CAPA Report in the CAPA binder;
- File a scanned electronic version of the CAPA Report in the Guided Steps electronic repository.

#### 7.1.5. CAPA Reviews

Executive Management will **monthly** meetings to discuss any open CAPAs, as well as any events or trends which may lead to future CAPAs.

CAPA summary will be reviewed **quarterly** at the Board of Directors meeting.

#### 8. Records

The original signed copy of this document is stored in the SOP 106: CAPA binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.



CAPA Report			
Report Number			
Date Initiated		Date Closed-Out	
Client		Contact	
Incident Description			
Corrective/Preventive Action Plan			
CAPA Implementation Date		Implementer	
Implementation Description		Implementation Results	
Follow-up Actions			
Comments			
Signature		Date (DD/MMM/YYYY)	



CAPA Report Log						
Initiator Name	Date Occurred	CAPA Severity	Description	Date Resolved	Resolution Details	Manager Initials

DRAFT

	Document Identifier	Version	Effective Date
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<h1>Archiving</h1> <p><i>DRAFT</i></p>			
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1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

DRAFT

2. Approvals

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
Signature	Date (DD-MMM-YYYY)

Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
Signature	Date (DD-MMM-YYYY)

**3. Overview**

This procedure outlines the process for storing off-site hardcopy documents and electronic files/data that are no longer in use at Guided Steps Compassion Center. The procedure will also provide for the retrieving of archived information, as required. The objectives of this SOP are to:

1. Provide an efficient, secure archiving process for applicable documents and electronic files/data.
2. Ensure archiving is conducted when necessary.
3. Provide for an annual audit of archived information.

**4. Scope**

This procedure applies to all Guided Steps employees involved with archiving documents and electronic files or data.

**5. Related Forms**

1. Archive Status Log

**6. Definitions**

There are no terms to be defined in this SOP.

**7. Procedure**

**7.1. Paper Files**

Office Manager or designated employee will prepare any hard copy material to be archived.

**7.1.1. On-Site Archive**

- Retired SOPs will be filed in the SOP binder and kept in a secured location.
- Employee personnel, patient/caregiver files will be kept in a secured filing cabinet.

**7.1.2. Off-Site Archives**

- Documentation/files (employee personnel, patient, caregiver files, etc.) will be audited on a semi-annual basis to determine the need for off-site archiving.
- Documentation/files identified for off-site archiving will be properly labeled and sent to **Iron Mountain**.

Office Manager or designated employee will update the Archive Status Log for material checked in or out of storage site [Iron Mountain].

**7.2. Electronic Files**

Management, Network Administrator, or designated employee will prepare any electronic media to be archived.

- Media files will be properly labeled and stored in the media file.
  - On-site storage will be in a secured cabinet.
  - Off-site storage will be properly labeled and sent to **Iron Mountain**.

Management, Network Administrator, or designated employee will update the Archive Status Log for material checked in or out of storage site [Iron Mountain].

**8. Records**

The original signed copy of this document is stored in the SOP 107: Archiving binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.



	Document Identifier	Version	Effective Date
	SOP 109	0.1	DD MMM YYYY

**Note:** This SOP will be updated when Guided Steps Compassion Center has been established, and the inventory management procedures have been further defined and documented.

# Inventory Management

DRAFT

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1. Revision History

Version	Date	Author	Revision Summary
0.1	DD MMM YYYY	<Name>	Initial version

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2. Approvals

Author	
As author, I acknowledge that this document is accurate, complete and contains the necessary degree of detail to accomplish the intended purpose.	
<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____
Management	
I have inspected the content and format of this document and have found no errors or omissions that are substantive enough to prohibit use.	
<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____

**3. Purpose**

The purpose of this document is to outline the inventory management policies and procedures for Guided Steps Compassion Center.

**4. Scope**

This SOP applies to all Guided Steps employees involved in the dispensation and inventory processes.

**5. Related Forms**

1. <Add applicable forms>

**6. Definitions**

**7. Inventory Department Policies**

The following policies will be adhered to within the Inventory Department:

1. Never leave large amounts of money or medicine alone anywhere except in the vault or inventory room.
2. All doors must stay locked and closed; only one door to a room may be left open when moving items.
3. The Inventory Room must stay locked unless someone is inside.
4. Never leave money out in the open in the inventory room, even if the doors are locked; always store in the cash box.
5. If a counting task is interrupted with a request from another department, instruct the individual to wait until you have completed your immediate task.
6. Finish current project before starting a new one.
7. Any changes made to the POS must be reviewed and approved by the VP of Operations.
8. All money must be counted twice.
9. Physical inventories must be conducted once a month.

**8. Inventory Opening Procedures**

The following procedures will be followed throughout the inventory process:

29 Del.C. Ch. 100 Freedom of Information Act

29 Del.C. Ch. 100 Freedom of Information Act

**9. Inventory Closing Procedures**

The following procedures will be followed:

29 Del.C. Ch. 100 Freedom of Information Act

**10. Monthly Inventory Procedures**

29 Del.C. Ch. 100 Freedom of Information Act

**11. Inventory Discrepancy Procedures**

29 Del.C. Ch. 100 Freedom of Information Act

## 29 Del.C. Ch. 100 Freedom of Information Act

### 12. Records

The original signed copy of this document is stored in the SOP 109: Inventory Management binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.

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	Document Identifier	Version	Effective Date
	SOP 112	0.1	DD MMM YYYY

**Note:** This SOP will be compiled when Guided Steps Compassion Center has been established, and the business continuity and disaster recovery procedures are defined and documented.

# Business Continuity/ Disaster Recovery Plan

73 Artisan Drive  
Smyrna, DE 19977  
(302)653-####

<Insert website address>



SOP 112: Business Continuity/Disaster Recovery Plan

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1. Revision History

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2. Approvals

Author	
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<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____
Management	
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<Name> <Title>	
Signature _____	Date (DD-MMM-YYYY) _____

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Compassion  
Center

SOP 112: Business Continuity/Disaster Recovery Plan

**3. The Continuity**

**3.1. Risk Management**  
*[List the potential risks to your business (in order of likelihood) and any mitigation/contingency strategies.]*

Business Risk	Impact	Likelihood	Mitigation Strategy	Contingency Plan
<i>[Description of the risk and the potential impact to your business.]</i>	<i>[High, Medium, Low.]</i>	<i>[Highly Unlikely, Unlikely, Likely, Highly Likely.]</i>	<i>[What actions will you take to minimise/mitigate the potential risk to your business?]</i>	<i>[What is your contingency plan in the event that this risk happens?]</i>

**4. Critical Business Area Analysis**  
*[Identify the critical areas of your business (e.g. product refrigeration process) and any protection strategies.]*

Rank	Critical Business Areas	Impact if failed	Current Protection Strategies
1	<i>[Description of what you can't do without: people, suppliers, documents, systems or even procedures.]</i>	<i>[Describe the potential impact on your business if this critical area fails.]</i>	<i>[What strategies do you have that minimise the impact to your business? e.g. Training employees in multiple areas of the business will reduce key person risk.]</i>

**5. Scenario Planning**

**5.1. Scenario 1 [Name of Scenario]**

Question	Details
Critical failure	<i>[Provide a short description of a critical area that could be interrupted.]</i>
Background	<i>[Provide any relevant background information that is essential to restoring the critical area.]</i>
Impact to business	<i>[Provides an estimate of the impact to your business. This can be in terms of percentage of sales or a dollar figure.]</i>
Immediate actions	<i>[List what needs to be completed immediately to ensure loss is kept to a minimum.]</i>
Secondary actions	<i>[Once immediate actions have been completed, what secondary actions can be completed until business has recovered completely?]</i>
Responsibilities	<i>[List the people who are responsible and for what during this critical business scenario.]</i>
Resources needed	<i>[What resources will you need to ensure you recover well in this sort of scenario? For example: cash flow, staff, service providers]</i>

**ADD MORE SCENARIOS AS NEEDED**

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Guided Steps  
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Center

SOP 112: Business Continuity/Disaster Recovery Plan

**6. Insurance**

Insurance Type	Policy Coverage	Policy Exclusions	Insurance Company & Contact	Last Review Date	Payments Due
<i>[e.g. Building, Contents, Car, Business Interruption]</i>	<i>[e.g. Damage from fire, flood, theft, Cyclone]</i>	<i>[e.g. Fraud, terrorism, tsunami, landslide]</i>			<i>[Amount you pay and frequency e.g. Monthly, yearly]</i>

**7. Property & Infrastructure**  
*[What have you done to make your property and infrastructure less vulnerable to damage? Is your property secured with alarms, security personnel or video surveillance from unlawful entry? Do you have fire retardant or flood resistant building materials? Is leaf litter grass and gutters maintained regularly to minimise fire risk?]*

**8. Business As Usual Planning**

**8.1. Temporary Office Accommodation**  
*[Identify temporary office accommodation you can quickly access in an emergency situation. Consider attaching a map of your accommodation to the back of your plan]*

Rank	Type	Address	Equipment available	Resources needed
1	<i>[E.g. Private residence, hotel, temporary business centre.]</i>	<i>[Enter the address of your temporary office site.]</i>	<i>[List all the equipment available at the site. e.g. Computers, furniture, photocopiers, phones, paper]</i>	<i>[List all the resources you will need in order to use this site as a temporary office. e.g. Software, backups, staff, and any other equipment not already available at the location.]</i>

**8.2. Business Continuity Strategies**  
*[What other strategies will you consider to help maintain business as usual practices? Have you considered a virtual office service, e-commerce website or an online auction or e-marketplace shopfront?]*

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9. Key Personnel Training

[List your current staff in the table below and any cross-training requirements.]

Job Title	Name	Expected Staff Turnover	Skills or Strengths	Cross-Training Requirements
[e.g. Marketing/Sales Manager]	[e.g. J. Smith]	[e.g. 12-18 months]	[E.g. Relevant qualifications in Sales/Marketing. At least 5 years' experience in the industry. Award in marketing excellence 2007. Fully qualified in first aid 2006.]	[e.g. Requires training in finance system]

9.1 Skill Retention Strategies

[What procedural documentation will you provide to ensure the skills of staff are maintained? Do you have an appropriate allocation of responsibilities? How are responsibilities documented and communicated to staff? What internal processes will you implement to regularly check that the current skills of staff members are still appropriate for the business?]

10. Data Security & Backup Strategy

[How have you protected your data and your network (e.g. virus protection, secure networks and firewalls, secure passwords and data backup procedures)? Detail your backup procedures in the table below.]

Data for Backup	Type of Data	Frequency of Backup	Backup Media/ Service	Person Responsible	Backup Procedure Steps
[List all the essential data that your business cannot recreate from other sources. If this list is substantial, consider a full system backup]	[E.g. Email, spreadsheet, payroll system data, website.]	[e.g. Daily, weekly, monthly]	[E.g. Magnetic tape, CD ROM, external hard disk drive, remote/online backup service.]	[e.g. C. Jones]	[List the steps required to perform the backup or attach a procedure document to the back of this plan]

11. Emergency Action Plan

11.1. Emergency Contacts

[List your local emergency services numbers and any additional contacts you will need to phone in an emergency (e.g. Employee's next of kin).]

Organization Name	Contact	Title	Phone Number
Police			
Fire			
Ambulance			

11.2. Emergency Procedures

[List your emergency/evacuation procedures. It may be useful to attach a copy of your detailed emergency procedures and floor plan with the location of emergency exits, emergency kit and safety equipment clearly marked. Your emergency procedures should also include a map of evacuation locations for all emergencies.]

Procedures	Brief Outline of Procedures	Evacuation Point/ Address	Reference to Full Procedure Document	Supporting Documentation
[e.g. Fire Evacuation Procedure]	[e.g. 1. Alarm raised and relevant emergency services authorities contacted. 2. Wait for evacuation signal. 3. Follow fire warden instructions. 4. Calmly evacuate the premises from nearest emergency exit. 5. Arrive at evacuation location. 6. Locate and account for all staff.]	[E.g. Corner of Safe Street and Sound Lane, City.]	[E.g. The Fire and emergency procedures.doc can be found on the shared drive under the 'Emergency' folder. A printed copy is also located in the main filing cabinet.]	[e.g. Office floor plan, Map of evacuation locations.]

11.3. Evacuation Drill Schedule

[Use this table to schedule your emergency evacuation drills.]

Evacuation Procedure Type	Drill Frequency	Person Responsible/Title	Next Drill Dates
<i>fe.g. Fire, Flood, cyclone!</i>	<i>[Month]</i>		<i>[Day/Month/Year]</i>

11.4. Emergency Kit

[Where is your emergency kit located/stored?]

11.4.1. Contents

[List the contents of your emergency kit and the date each item was last checked/reviewed.]

Object	Checked/Reviewed Date	Person Responsible
<i>Emergency management &amp; recovery plan</i>	<i>[Day/Month/Year]</i>	
<i>Emergency and recovery contacts</i>	<i>[Day/Month/Year]</i>	
<i>Insurance documents</i>	<i>[Day/Month/Year]</i>	
<i>Financial documents</i>	<i>[Day/Month/Year]</i>	
<i>Flash light</i>	<i>[Day/Month/Year]</i>	
<i>First-aid kit</i>	<i>[Day/Month/Year]</i>	
<i>Portable radio</i>	<i>[Day/Month/Year]</i>	
<i>Plastic bags</i>	<i>[Day/Month/Year]</i>	
<i>Spare batteries</i>	<i>[Day/Month/Year]</i>	
<i>Adhesive tape</i>	<i>[Day/Month/Year]</i>	
<i>Pen/pencil and notepad</i>	<i>[Day/Month/Year]</i>	

11.5. Emergency Team Roles & Responsibilities

Role	Details of Responsibilities	Person Responsible	Email	Phone/Mobile Numbers
<b>First Aid Officer</b>	<i>[e.g. Attend regular first aid training courses. Administer first aid support in an emergency situation. Contact ambulance services when necessary.]</i>			
<b>Chief Fire Warden</b>	<i>[e.g. Attend relevant training courses. Communicate procedures to all staff. Supervise and action emergency evacuation procedures (including contacting emergency services, accounting for staff). Conduct regular drills. Update procedures regularly.]</i>			
<b>Fire Warden</b>	<i>[e.g. Attend relevant training courses. Assist in evacuating staff according to evacuation procedures (including collecting emergency kit and resilience and recovery documentation). Assist with regular drills. Assume Chief Fire Warden duties when required.]</i>			

12. The Recovery

12.1. Business Impact Assessment

[Based on your assessment of the damage to your business, complete the table below (in order of severity) or attach your own impact assessment to the back of your plan.]

Rank	Damage	Impact to Business	Severity	Action	Recovery Steps	Resources Needed	Actioned By	Estimated Date of Completion
1	[List any damage to buildings, assets, stock, documents or surrounding area/community.]	[Describe any direct or indirect impacts the damage will have on your business' critical functions.]	[High, Medium, Low.]	[Repair, replace, rebuild.]	[List the steps needed to recover the damage.]	[List the resources needed to recover including any cost estimates, service providers, employees, building materials.]	[Assign someone to each task.]	[Due date for completion.]

12.2. Recovery Contacts

[Include all of the organisations/people that will be essential to the recovery of your business. See also Emergency contacts above.]

Contact Type	Company Name	Contact	Title	Phone/Mobile Number
Insurance				
Phone/Internet Provider				
Bank				
Property Manager				
Supplier (Main)				
Supplier (Backup)				
Accountant				
Lawyer				

12.3. Insurance Claims

[What insurance policies have you claimed for? Use the table below to record any discussions you have had with an insurer about your claim.]

Insurance Company	Date of Contact	Details of Conversation/Claim	Follow-Up Actions
Company Name Address Phone Number	[Day/Month/Year]	[Enter any relevant details discussed with your insurer about your claim. e.g. When will the assessor visit? Did you receive an estimated claim amount?]	[Is there anything you or the insurer need to complete to continue processing the claim? Is there any information the insurer requires to process the claim (e.g. estimate of the damage, serial numbers for stolen equipment, photos)? Are there any special instructions the insurer has asked you to do/not do in regards to the clean-up effort or property?]

13. The Finances

13.1. Current Creditors

[List all current creditors and any arrangements you have made during the recovery period.]

Creditor Name	Contact Details	Special Arrangement Details	Period of Special Arrangement	Amount to Pay
[E.g. Example Banking Corp.]	[J. Harmer, Business Loan Advisor, (Area code) Number] [Mobile number]	[List the conditions of your arrangement. e.g. Loan temporarily changed to interest only arrangement for the period of recovery.]	[Enter the period the arrangement will be valid until. e.g. Period of 6 months ending on 1 July 2011]	[Detail the amounts you are required to pay within the arrangement period.]

13.2. Current Debtors

[List all current debtors you have contacted and their agreed payment amount and date.]

Debtor Name	Contact Information	Details	Agreed Payment Date	Amount
[Example Business]	[P. Fred, (Area code) Number] [Mobile number]	[Briefly list what the payment was for.]	[Day/Month/Year]	[\$\$\$]



SOP 112: Business Continuity/Disaster Recovery Plan

**14. Plan Review and Maintenance**

This plan is intended to be a living document, and will be reviewed semi-annually as well as exercised (via mock disaster test or walk-through) on an annual basis. The plan will be stored in a common location where it can be viewed by system personnel.

**15. Records**

The original signed copy of this document is stored in the SOP 112: Business Continuity/Disaster Recovery Plan binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.

DRAFT

**Appendix U – Forms**



**Patient/Caregiver Registration Form**

Patient \_\_\_\_\_ Caregiver \_\_\_\_\_ Date: \_\_\_\_\_

First Name: \_\_\_\_\_ Middle: \_\_\_\_\_ Last: \_\_\_\_\_

DE Driver's License #: \_\_\_\_\_ DE ID #: \_\_\_\_\_

Registry ID Card #: \_\_\_\_\_ Date Issued: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Home Phone Number: \_\_\_\_\_ Cell Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Physician's Name: \_\_\_\_\_

Physician's Office Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Office Phone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Last Visit Date: \_\_\_\_\_ Recommendation Expires: \_\_\_\_\_

**I hereby authorize my treating physician to release medical information regarding my diagnosis and condition to Guided Steps Compassion and Wellness Center.**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**I understand and agree as follows:**

I am a qualified patient protected by The Delaware Medical Marijuana Act Title 16 Chapter 49A Section 4903A. My physician has recommended the use of medical marijuana and provided written documentation of such recommendation. My physician will review my case on a yearly basis. Per the relevant sections of Delaware law, I am able to legally possess and use cannabis collectively for medical purposes. I designate Guided Steps Compassion Center as my care providers. I agree to follow all the rules and guidelines of the collective and pay reasonable donation and/or volunteer for other services and activities provided by the collective.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**For Office Use Only**

Verified: \_\_\_\_\_ NOT Verified: \_\_\_\_\_ Date and Time: \_\_\_\_\_

Verified By: \_\_\_\_\_

Notes: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



**DISCLAIMER**

**General Release, Indemnification and Hold Harmless Clause**

I, \_\_\_\_\_,  
being of lawful age and sound mind, do now release, acquit, and forever discharge Guided Steps Compassion Center herein referred to as owner, of **73 Artisan Drive, Smyrna, Delaware, Kent County, 19977** from all actions, claims, demands, or damages accruing to me from any known or unknown injury, loss, or damage sustained by or to me. This release shall remain in force and run concurrently with my membership in Guided Steps Compassion Center.

In witness whereof, I have executed this release in Smyrna, Delaware. I further agree to indemnify and hold harmless Guided Steps Compassion and Wellness Center from any injuries or damages resulting from use or misuse of medical marijuana obtained from the registered safety compliant facility.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



### Patient/Caregiver Code of Conduct Agreement

We, at Guided Steps Compassion Center, are extremely grateful our neighborhood accepts and welcomes us! Therefore, we ask your cooperation to keep our organization in good standing and repute. Below are the guidelines for Patient/Caregiver Code of Conduct.

In order to enter the facility, you must be at least 21 years of age with a valid Delaware Driver's License or valid Delaware State issued ID card.

Please have your medical marijuana Registry ID Card and valid State of Delaware ID ready for presentation to the Security Guard stationed in the main entrance.

You must have a current valid doctor's recommendation for medical marijuana; recommendations must be renewed on an annual basis.

Do not use or consume medicine in the building, in the parking lot, or in the surrounding area.

Cell phones or cameras are not permitted inside the facility. If these items are in your possession upon check-in with the Security Guard, they will be confiscated and held until your departure from the premises.

Please do not ask for any information other than store hours over the phone. If you have questions, please ask them in person at the facility.

You may not sell or redistribute your medicine to others.

Please be very discrete and place your medicine out of sight before leaving the facility. Do not display or discuss your medicine in the surrounding neighborhood.

Keep all medications locked up in a safe place.

Do not engage in loud, boisterous, or disruptive behavior in or near the facility.

All patients/caregivers should arrive and leave alone.

No backpacks are allowed in the facility.

No money is to be exchanged inside or outside of the facility between other patients or caregivers.

No loitering around the facility.

Patients/Caregivers are allowed only one visit a day, which is via appointment only.

Use of marijuana while driving may result in charges of driving under the influence. Do not drive or operate heavy machinery while using marijuana.

Respect and show courtesy towards all staff, patients, caregivers, and our neighbors.

I agree to these rules and I understand that violations of these rules will result in immediate termination of my privileges at Guided Steps Compassion Center.

Name (please print): \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

73 Artisan Drive • Smyrna • DE • 19977 • (302) 653-####



**Acknowledgement of Confidentiality  
of Patient/Caregiver Information**

I agree to treat as confidential all information about patients/caregivers or former patients/caregivers and their families that I learn during the performance of my duties as \_\_\_\_\_ (position title), and I understand that it would be a violation of policy to disclose such information to anyone without checking first with my immediate supervisor.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

DRAFT



**Volunteer Application and Agreement**

Last Name: \_\_\_\_\_ First Name: \_\_\_\_\_ Date: \_\_\_\_\_

\*Name of Parent or Guardian if under 18 years of age: \_\_\_\_\_

*\*If volunteer is less than 18 years of age, the parent or guardian must also complete a volunteer application and agreement form.*

Address: \_\_\_\_\_  
\_\_\_\_\_

Phone No.: \_\_\_\_\_ (H) \_\_\_\_\_ (O) \_\_\_\_\_ (C)

Email Address: \_\_\_\_\_

Company or Volunteer Group Name: \_\_\_\_\_

Date of Birth: \_\_\_\_\_ Driver's License No. \_\_\_\_\_

Emergency Contact: \_\_\_\_\_  
(Name) (Phone Number: Indicate Home, Work or Cell) (Relationship)

Do you have any friends/family members who are employed or volunteer here? \_\_\_ Yes \_\_\_ No

What days of the week will you be available to volunteer (specify hours of availability)?

Monday \_\_\_\_\_ Tuesday \_\_\_\_\_ Wednesday \_\_\_\_\_ Thursday \_\_\_\_\_ Friday \_\_\_\_\_

Saturday \_\_\_\_\_ Sunday \_\_\_\_\_ Holidays Only \_\_\_\_\_

Types of volunteer work you think you'd be most comfortable with:

\_\_\_ Helping with a group activity \_\_\_ Helping with a fundraising event

\_\_\_ Working one on one \_\_\_ Helping with a wellness event

\_\_\_ Other: \_\_\_\_\_  
(Please specify)

List Your Past Volunteer Experiences:

Organization: \_\_\_\_\_ Duties: \_\_\_\_\_ Mo./Yr. to Mo./Yr. \_\_\_\_\_

Organization: \_\_\_\_\_ Duties: \_\_\_\_\_ Mo./Yr. to Mo./Yr. \_\_\_\_\_

Have you ever been adjudged civilly or criminally liable for abuse of an individual with disabilities?  
No \_\_\_ Yes \_\_\_

Have you been convicted of a crime? No \_\_\_ Yes \_\_\_

If yes, please describe: \_\_\_\_\_



Volunteer Application and Agreement

**BACKGROUND CHECK:** Guided Steps Compassion Center requires volunteers working with individual consumers to submit to a background check. Criminal conviction does not necessarily bar an applicant from volunteering. The nature of the offense will be taken into consideration before a decision is made. There is no fee on the part of the volunteer for the background check. Screening must be completed before volunteers begin working with consumers.

\_\_\_\_\_ I agree to have a background check.

**HEALTH:** Guided Steps Compassion Center requires that all volunteers with close consumer contact provide proof of a documented negative result on a Mantoux test completed within three years from the date of this volunteer application.

\_\_\_\_\_ I agree to forward results from my most recent Mantoux test from my physician within two weeks of the date on this application.

**REFERENCES:** List two people, not related to you who have knowledge of your qualifications.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone No.: \_\_\_\_\_ (H) \_\_\_\_\_ (O) \_\_\_\_\_ (C)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone No.: \_\_\_\_\_ (H) \_\_\_\_\_ (O) \_\_\_\_\_ (C)

\_\_\_\_\_ I need the following accommodation(s) to work as a volunteer: \_\_\_\_\_

As a volunteer for Guided Steps Compassion Center I agree to abide by all applicable rules and regulations of the agency and the Delaware Division of Developmental Disabilities Services and Delaware Health and Social Services. I understand that I will receive no monetary benefits in return for my volunteer service and that Guided Steps Compassion Center may terminate this agreement at any time without prior notice for any reason. I hereby authorize Guided Steps Compassion Center to check my references, and I understand that a criminal background check is required.

I certify that my answers on this application are true and complete and that I have not knowingly withheld any information that might, if disclosed, affect my application unfavorably. I understand that any misrepresentation or omission of facts on this application could be cause for rejection of this application or dismissal.

I understand that after I submit my application, it will be reviewed and my eligibility for volunteer work will be determined. I agree to an interview with the on-site manager and on site orientation to perform my volunteer role.

I hereby Release and Waive liability against Guided Steps Compassion Center a non-profit corporation, its directors, officers, employees and agents, its successors and assigns, for any injuries or illness that I myself or my dependent may suffer in connection with any volunteer work for Guided Steps Compassion Center. Further, I agree that Guided Steps Compassion Center is not liable for any damage to my property or my dependent's property resulting from volunteer work for Guided Steps Compassion Center. I agree that this release is as broad and inclusive as permitted by the laws of the State of Delaware.

Volunteer Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Appendix V – Certification Sheet**



**DELAWARE HEALTH AND SOCIAL SERVICES  
REQUEST FOR PROPOSAL**

**CERTIFICATION SHEET**

As the official representative for the proposer, I certify on behalf of the agency that:

- a. They are a regular dealer in the services being procured.
- b. They have the ability to fulfill all requirements specified for development within this RFP.
- c. They have independently determined their prices.
- d. They are accurately representing their type of business and affiliations.
- e. They will secure a Delaware Business License.
- f. They have acknowledged that no contingency fees have been paid to obtain award of this contract.
- g. The Prices in this offer have been arrived at independently, without consultation, communication, or agreement, for the purpose of restricting competition, as to any matter relating to such prices with any other contractor or with any competitor;
- h. Unless otherwise required by Law, the prices which have been quoted in this offer have not been knowingly disclosed by the contractor and prior to the award in the case of a negotiated procurement, directly or indirectly to any other contractor or to any competitor; and
- i. No attempt has been made or will be made by the contractor in part to other persons or firm to submit or not to submit an offer for the purpose of restricting competition.
- j. They have not employed or retained any company or person (other than a full-time bona fide employee working solely for the contractor) to solicit or

secure this contract, and they have not paid or agreed to pay any company or person (other than a full-time bona fide employee working solely for the contractor) any fee, commission percentage or brokerage fee contingent upon or resulting from the award of this contract.

- k. They (check one) operate \_\_\_an individual; \_\_\_a Partnership a non-profit (501 C-3) organization; \_\_\_a not-for-profit organization; or \_\_\_for profit corporation, incorporated under the laws of the State of \_\_\_\_\_.
- l. The referenced offerer has neither directly or indirectly entered into any agreement, participated in any collusion or otherwise taken any action in restraint of free competitive bidding in connection with this bid submitted this date to Delaware Health and Social Services.
- m. The referenced bidder agrees that the signed delivery of this bid represents the bidder's acceptance of the terms and conditions of this invitation to bid including all Specifications and special provisions.
- n. They (check one): \_\_\_are; are not owned or controlled by a parent company. If owned or controlled by a parent company, enter name and address of parent company:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Violations and Penalties:**

Each contract entered into by an agency for professional services shall contain a prohibition against contingency fees as follows:

1. The firm offering professional services swears that it has not employed or retained any company or person working primarily for the firm offering professional services, to solicit or secure this agreement by improperly influencing the agency or any of its employees in the professional service procurement process.
2. The firm offering the professional services has not paid or agreed to pay any person, company, corporation, individual or firm other than a bona fide employee working primarily for the firm offering professional services, any fee, commission, percentage, gift, or any other consideration contingent upon or resulting from the award or making of this agreement; and

3. For the violation of this provision, the agency shall have the right to terminate the agreement without liability and at its discretion, to deduct from the contract price, or otherwise recover the full amount of such fee, commission, percentage, gift or consideration.

The following conditions are understood and agreed to:

- a. No charges, other than those specified in the cost proposal, are to be levied upon the State as a result of a contract.
- b. The State will have exclusive ownership of all products of this contract unless mutually agreed to in writing at the time a binding contract is executed.

29 Del. C. Ch. 100 Freedom of Information Act

April 7, 2014  
Date

  
Signature & Title of Official Representative

Fabian B. Livingston  
Type Name of Official Representative

**Appendix W – Statements of Compliance**



**DELAWARE HEALTH AND SOCIAL SERVICES  
REQUEST FOR PROPOSAL**

**STATEMENTS OF COMPLIANCE FORM**

As the official representative for the contractor, I certify on behalf of the agency that Guided Steps Compassion Center (Company Name) will comply with all Federal and Delaware laws and regulations pertaining to equal employment opportunity and affirmative action. In addition, compliance will be assured in regard to Federal and Delaware laws and regulations relating to confidentiality and individual and family privacy in the collection and reporting of data.

29 Del. C. Ch. 100 Freedom of Information Act

Authorized Signatur \_\_\_\_\_

Title: Founder/President \_\_\_\_\_

Date: April 7, 2014 \_\_\_\_\_

Appendix X – Paramount Group Commitment Letter

**The Paramount Group**

1950 Old Cuthbert Road Suite A & B Cherry Hill NJ 08002 856-298-1452

**Commitment Letter**

**Congratulations!** Your loan application has been approved subject to the terms and conditions included in this commitment letter. You may be required to provide documentation that is acceptable to the Lender. If the documentation you provide does not satisfy the terms and conditions, your final approval is not guaranteed and the Lender may require additional information and review. This commitment is also subject to reconsideration if there is any material change in your financial status, in the information provided in your application.

Loan Type: 29 Del.C. Ch. 100 Freedom of Information Act

**Credit Documents**

All credit documents over 120 days old as of the date of the closing will need to be updated prior to loan closing to ascertain that your ability to repay has not changed adversely.

**Program Availability**

We reserve the right to modify or eliminate this loan program at any time without notice to you. If the program is eliminated or you no longer qualify because of program modifications, this Approval will be void and you will be required to submit a new application for a different loan program.

**Payment of Fees**

By accepting this commitment, The Applicant/or Applicants agrees to pay all closing costs

**Modification**

We reserve the right to withdraw this approval, or to modify the terms as required, if any material facts appear which have not been previously revealed to us by you.

Client Name: Guided Steps Compassion Center

Rate Lock: 30 days

Processor: Ellis Johnson

Loan Rep: Michael Martin

Date: 03/18/2014

29 Del.C. Ch. 100 Freedom of Information Act

*Michael Martin* x

The Paramount Group Authorized Signature

03/18/14

**Appendix Y – Guided Steps Compassion Center Business Plan**

# **Business Plan**

*Guided Steps  
Compassion  
Center*

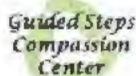
**Confidentiality Notice:** This Business Plan is the property of Guided Steps Compassion Center (Guided Steps), a Delaware Non-Profit Organization. No part of this Business Plan may be reproduced without the express written consent of Guided Steps' Executive Management team.



Business Plan

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## 1. Executive Summary

Guided Steps Compassion Center will be the first of its kind in the State of Delaware... *"The first place [compassion center] in the First State!"* Not only as a medical marijuana facility, but also as a center focused on guiding patients in their steps to better overall health and wellness. Our goals are to offer patients top quality affordable medical marijuana in healing, loving, and safe environment, as well as provide funds from donations and fundraisers to programs dedicated to improving and redeveloping communities in our local townships and throughout the state.

Guided Steps Compassion Center will help pave the way in changing society's stereotypical views of people who use marijuana as merely being "stoners", "potheads", or "losers". We believe many people in today's society fail to see these individuals as those suffering from major debilitating diseases (e.g. cancers, neurological diseases, multiple sclerosis), seizures, diabetes, post-traumatic stress disorder, to name a few. These individuals are mothers, fathers, and children needing assistance from Mother Nature, not pharmaceutical companies.

Sadly, pharmaceuticals have been found to cause more damage to a person's body through their chemical compounds and severe side effects. A pill may take away one's pain, but destroy one's liver in the process. Chemotherapy may kill cancer, but the treatment also kills cells, tissues, and much more. Mother Nature designed her own medicine without harsh chemicals or severe side effects in the amazing cannabis plant.

There are several attributes that will make Guided Steps Compassion Center a very unique facility. Guided Steps will grow organic, pharmaceutical grade medical marijuana as Mother Nature intended; without harsh chemical pesticides or organisms that would change the plant's genetic make-up and treated with tender loving care.

We will focus on producing CBD-rich medicine which is a powerful preventive and curative medicine for some of the most serious diseases plaguing humankind; diseases like cancer and epilepsy and Alzheimer's. It is also an excellent alternative for patients who find high-THC cannabis too strong, or prefer to access the therapeutic effects of cannabis without its psychoactive properties for whatever reason. THC-rich medicine is recommended for patients suffering from debilitating diseases, such as AIDS-related wasting syndrome, as it increases appetite and has been shown to be effective in maintaining body weight.

Through income from donations and fundraising events, Guided Steps Compassion Center will focus on offering wellness therapies to patients free of charge. Wellness therapies will help patients incorporate a healthy balance of mind, body, and spirit resulting in an overall feeling of well-being.

Guided Steps Compassion Center will also offer a wide range of educational programs to patients covering such topics as HIPPA to medical marijuana strains, treatments and usage to pain management. To stay on the cutting-edge of modern technology and enforce our commitment to patients, we will offer "live-streamed" on-line classes to disabled and/or bedridden patients who are unable to attend in person. Stringent security measures to validate patient information will be developed, tested, and in place before the on-line classes are rolled out.

Guided Steps Compassion Center will donate funds obtained from donations to the local townships of Smyrna and Clayton, as well as State of Delaware programs dedicated to improving and redeveloping communities. We will also develop a Veterans Housing Program, which will be designed for building modified homes for disabled veterans.

These several attributes, combined with others developed and implemented as the center grows, will help make Guided Steps Compassion Center a very unique facility as we focus on guiding patients in their steps to overall better health and wellness, along with giving back to our local townships and state programs dedicated to improving and redeveloping communities.



## 2. Mission Statement

*Our mission is offer patients top quality affordable medical marijuana in a healing, loving, and safe environment, along with educational programs and wellness therapies that will assist them in their steps to better overall health and wellness.*

## 3. Company Information

Guided Steps Compassion Center is a non-profit organization and will be located at 73 Artisan Drive, Smyrna, Delaware in Smyrna Business Park, which is convenient to Route and DuPont Highway (Route 13).

Hours of operation will be Monday through Friday 9:00AM to 8:00PM. Patients will visit the Center on an appointment basis only.

The center will have between 10-15 employees to start, with plans of hiring as the center grows. Each member of the team will execute their duties ensuring all compliance is in adherence with Federal and Delaware laws, with emphasis on ensuring high quality security, products, and service Employee backgrounds cover the following industries:

- Pharmaceutical
- Finance
- Healthcare/Insurance
- Information Services
- Education
- Psychology
- Chemistry

Guided Steps will offer a unique combination of services to patients registered with the Delaware State Medical Marijuana Program such as:

- Sativa, Indica, and Hybrid medical marijuana strains.
- Alternative devices for medicinal intake (e.g. humidifier vs. smoking medication).
- Web orders for patient convenience.
- Delivery services during business hours for bedridden patients.
- Emergency after-hour delivery services for special circumstances ONLY.
- Sliding scale for cost of medication to ensure affordability for patients.

Programs to help improve quality of life for patients diagnosed with a debilitating disease or chronic pain:

- o Educational programs
- o Chiropractic services
- o Massage therapy
- o Acupuncture
- o Reflexology
- o Reiki
- o Jin Shyn Jitsu
- o Health coach counseling

Guided Steps Compassion Center medical marijuana product line will be grown organically and will receive ultimate loving treatment to ensure the purist strands are produced. An HPLC Medical Cannabis Testing System will be used to certify the highest quality results. To meet the needs to patients who do not wish to smoke the medication will be provided alternative options such as vaporizers, tinctures, concentrates (oils), lotions, and ointments.



#### 4. Marketing and Sales

##### Marketing Analysis

Guided Steps Compassion Center's target market will be the patients registered with the DHSS Medical Marijuana Program. Being Delaware's pilot center servicing the entire state, the customer base will grow as more patients register with the program.

##### Pricing and Gross Margin Targets

Guided Steps will be committed to providing medical marijuana at low to no cost to patients for whom paying full price would constitute an actual and substantial economic hardship. Our policy will continue to evolve and/or be modified based on law, research sensitivity with respect to potential diversion and/or concerns, qualifying debilitating medical conditions, patient feedback, etc.

Guided Steps Compassion Center discounts and programs will be as follows:

- a. **State, Federal, and Military Disability Patients**
  - i. 25% discount twice per month.
- b. **Cancer and AIDS Compassionate Care and Access Program**
  - i. 25% discount twice per month.
- c. **Terminal patients with less than 6 months to live**
  - i. Free services such as assistance with physician recommendations, transportation to physician offices, referral and medical counseling; and
  - ii. Free medicine to patients within legal dispensing guidelines and terms recommendation.
- d. **Sliding Sale/Free Medicine Services**
  - i. Seriously ill patients who cannot afford medical cannabis.
- e. **Guided Steps Angel Program**
  - i. Guided Steps team members
    - Money donations by members and staff match by Guided Steps, on a temporary, as needed basis.
  - ii. Patients with small amounts of money.
    - Guided Steps will seek, on an individual basis, to match the patient's contribution so that the patient can purchase needed medical cannabis; and
  - iii. No one in need is turned away.
    - Guided Steps will seek, on an individual basis, to provide free medicine at the time of the patient's visit (within the legal dispensing guidelines and terms of recommendation) until he or she is able to purchase it in the future.
- f. **Guided Steps Clothing Donation Program**
  - i. Patients and caregivers can donate "gently used" clothing, shoes, etc. to Guided Steps for a 10% discount.
  - ii. Clothing will be given to:
    - Vietnam Veterans of America located in Silver Spring, Maryland, and
    - Military Order of the Purple Heart Services Foundation located in Annandale, Virginia
- g. **General Discounts**
  - i. 10% Veterans Discount
  - ii. 10% Senior Citizen Discount (65 years of age or older); and
  - iii. Member patients who cannot afford medication (based on total income below 200% of the Federal Poverty Level Guidelines).



Business Plan

**h. Bonus Points Rewards Program**

- i. Patients and caregivers will earn 1 point for every dollar donated for medical cannabis or paraphernalia.
- ii. As points are earned, the patient or caregiver will receive a designated item for free as described below:

Guided Steps Bonus Point Reward Point System	
Number of Points	Reward
200	Free small glass smoking pipe or grinder of patient's choice
500	Free small vaporizer system
1,000	Free 1/8 oz. medical cannabis ( <i>Guided Steps choice</i> )
2,500	Free ¼ oz. medical cannabis ( <i>Guided Steps choice</i> )
5,000	Free ½ oz. medical cannabis of patient's choice

- iii. Once the maximum number of points is reached, the Point System will be reset to 0, and count starts over.

**SWOT Analysis**

- **Strengths**
  - Location – centrally located within the state
  - Patient accessibility
  - Delivery services
  - Health, wellness, therapeutic services offered
  - Focus on patient overall wellbeing, not just medical cannabis
- **Weaknesses**
  - 150 plant/1,500 ounce limitation may cause supply/demand problems
- **Opportunities**
  - Ability to prove viability of medical marijuana program benefits to patients
- **Threats**
  - Small local township; may not be accepting of medical marijuana facility in the area
  - Negative media
  - Theft
  - Vandalism
  - Bad crop; loss of product

**Sales Strategy**

Guided Steps Compassion Center will deploy an online marketing strategy via the center's website. The site will be designed to provide a plethora of medical cannabis educational resources as well as allow patients to place web orders.

Guided Steps Compassion Center will penetrate the market as the sole provider of medical cannabis, supplies, and services in Delaware, allowing the center a competitive advantage simply because it will be the only provider for the State of Delaware.

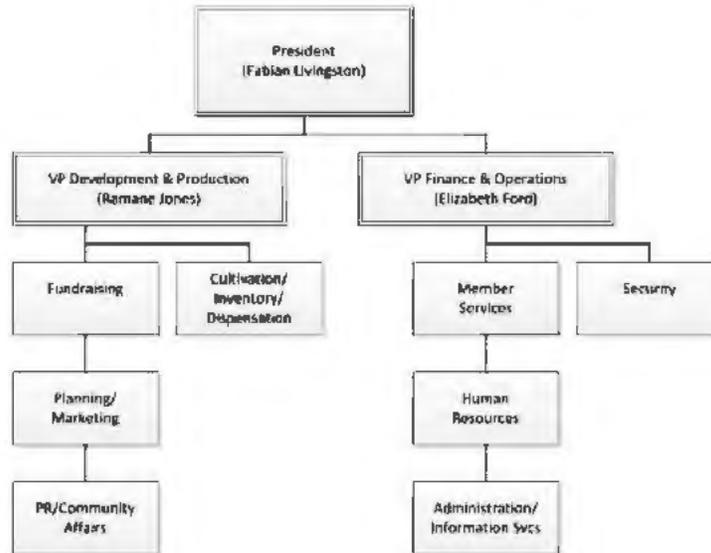
Guided Steps will grow through developing new products and offering additional services such as training classes and workshops to patients. A focus on employee engagement will also help the center in providing favorable sales experiences to customers which, in turn, will drive growth in sales. Guided Steps will also create loyalty campaign programs for existing customers to attract new customers.

An internal sales team will be created to visit and educate doctors about the benefits of the Delaware Medical Marijuana Program for patients. Prospects will include existing patients of doctors as well as elderly care facilities in Delaware. Each sales representative will be:

- Required to make cold calls and/or visits on a daily basis.
- Follow up on very lead after two days, two weeks and two months.
- Provided a monthly quota to achieve and maintain in other to drive the business towards the Center's goals.

## 5. Organization and Management

Guided Steps Compassion Center's organization will be structured as follows:



### Ownership Information

Guided Steps Compassion Center is a Not-for-Profit organization formed in 2013 by Fabian Livingston (Founder, President) and Ramane Jones (Co-Founder, Vice President of Development and Production).

### Executive Management

Guided Steps Compassion Center's Executive Management Team consists of the following individuals:

#### **Fabian Livingston, President and Co-Founder**

Mr. Livingston brings to Guided Steps Compassion Center experience from being a successful business owner of 15 years; personal experiences with Post-Traumatic Stress Disorder; knowledge from training in marijuana horticulture, cooking with marijuana, budtender training, marijuana laws, how to open a dispensary and delivery service, and marijuana as medicine; and a strong passion in creating a compassion center focused on helping individuals to heal naturally.

Mr. Livingston's role as President of Guided Steps Compassion Center and Board of Directors will include supporting and conducting administration for the board; informing board members of the current status of the organization, as well as advise members on preferred strategies and resolutions; oversee and manage organization programs and projects; oversee the fundraising for Guided Steps Compassion Center, including planning, strategies and implementation. The President will work directly with the Vice President of Development and Production and Vice President of Finance and Operations to determine the financial needs of the organization, as well as submit proposals to donors and take care of the fundraising records. The President will recommend a budget to the board annually and ensuring the staff adheres to the approved budget.



Business Plan

**Ramane Jones, Vice President of Development & Production and Co-Founder**

Mr. Jones brings to Guided Steps Compassion Center vast knowledge gained from over 15 years in business-building, the mental health field, and a deep commitment to helping patients. His interest in operating a Compassion Center in Delaware is also intensely personal, stemming from the loss of his father who endured a long yet dignified fight against AIDS. During his father's treatments, doctors indicated that medical cannabis may be a viable option for pain relief. Because the medical cannabis was illegal at time, the option was never pursued. Following his father's death, Mr. Jones was left wondering if medical cannabis could have in some way alleviated his father's pain and suffering.

Mr. Jones's role as Vice President of Production and Development of Guided Steps Compassion Center and Treasurer of the Board of Directors will include serving as a key leadership team member and an active participant in making strategic decisions affecting Guided Steps Compassion Center. In partnership with the President, the VP of Development and Production is responsible for all fundraising and development activities, and will help forge new relationships to build Guided Steps' visibility, impact, and financial resources. The VP of Development and Production will also design and implement a comprehensive plan for developing key external alliances by cultivating individual and philanthropic support, as well as having primary responsibility for establishing and implementing the infrastructure needed to grow a \$M budget through the solicitation of major gifts, federal and state grants, special events, and corporate and foundation support.

**Elizabeth Ford, Vice President of Finance & Operations**

Ms. Ford brings a unique combination of assets to Guided Steps Compassion Center in the form of 30+ years' experience working in the corporate environments of mortgage banking, insurance, education, finance, and pharmaceuticals, along with a Bachelor of Science degree in Organizational Management and as a Certified Health Coach through the Institute of Integrative Nutrition. She brings quality assurance experience from working with pharmaceutical clinical trial software programs, ensuring validation documents were FDA compliant; experience in composing and implementing Standard Operating Procedures and Work Instructions, and experience in budget management. Her degree in Organizational Management brings a knowledgebase on the inner workings of corporate infrastructure and how to build strong integral company foundations.

Ms. Ford's role as Vice President of Finance and Operations of Guided Steps Compassion Center and Secretary of the Board of Directors will include being s responsible for all financial matters of the business; planning, policy and investor relations; accounting and administration; partnering with the senior leadership and the board of directors to develop and implement strategies across the organization; and oversee all compliance and recognition for government (federal and state) contracts and private grants.

**Guided Steps Compassion Center Staff**

Guided Steps' staff will be comprised of highly motivated, dedicated, honest, and hard-working business professionals who are committed to and passionate about living up to our mission in emphasizing compassion, care, kindness, and understanding as we guide our patients in their steps to better health and wellness.

**Board of Directors' Qualifications**

Guided Steps' Board of Directors will be comprised of well-known, successful business owners/managers who will enhance the compassion center's credibility and perception of management expertise.

**6. Product Line and Services**

Guided Steps will offer the following and services:

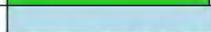
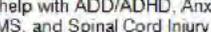
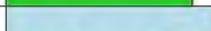
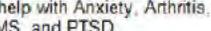
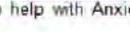
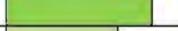
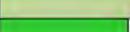
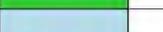
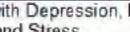
- Web orders for patient convenience.
- Delivery services during business hours for bedridden patients.
- Emergency after-hour delivery services for special circumstances ONLY.
- All services will be on an appointment only basis.
- Sliding-scale pricing for eligible patients.
- 20% discount for veterans and seniors.
- Care Package Program which will consist of donations to low income registered patients who are unable to afford medication but are in dire need of the medication.

**Medical Marijuana Product Line**

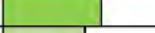
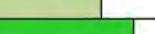
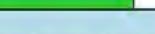
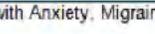
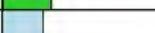
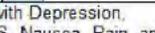
The medical marijuana growing time averages to be approximately 3 months. Guided Steps' will utilize a stringent growth cycle to ensure product availability on a consistent basis. Guided Steps' will offer the following medical marijuana strains in final products such as:

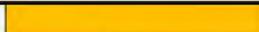
- Tinctures
- Ointments
- Lotions
- Balms
- Soaps
- Bath Salts

Hybrid Strains		Treatment		Donation	
<b>Blue Cheese</b>  CBD: 1.3% Avg. THC: 20% Avg.		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Nausea		1/8 oz	60.00
		Pain		1/4 oz	100.00
		Stress		1/2 oz	175.00
		Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and Bipolar Disorder.			1 oz
<b>Blue Chemdawg</b>  THC: 15-20%		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Nausea		1/8 oz	60.00
		Pain		1/4 oz	100.00
		Stress		1/2 oz	175.00
		Also used to help with ADD/ADHD, Anxiety, Migraines, PTSD, and Spinal Cord Injury.			1 oz
<b>Blue Dream</b>  CBD: 0.4% Avg. CBN: 0.3% Avg. THC: 18% Avg.		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Nausea		1/8 oz	60.00
		Pain		1/4 oz	100.00
		Stress		1/2 oz	175.00
		Also used to help with Anxiety, Arthritis, Migraines, PMS, and PTSD.			1 oz

<b>Bubba Kush</b>  CBD: TBD THC: TBD		<b>Depression</b> 	<b>Gram</b>	20.00		
		<b>Insomnia</b> 	<b>1/16 oz</b>	40.00		
		<b>Nausea</b> 	<b>1/8 oz</b>	60.00		
		<b>Pain</b> 	<b>1/4 oz</b>	100.00		
		<b>Stress</b> 	<b>1/2 oz</b>	175.00		
		Also used to help with ADD/ADHD, Anxiety, Migraines, PMS, and Spinal Cord Injury.			<b>1 oz</b>	350.00
<b>California Dream</b>  THC: Up to 24%		<b>Depression</b> 	<b>Gram</b>	20.00		
		<b>Insomnia</b> 	<b>1/16 oz</b>	40.00		
		<b>Nausea</b> 	<b>1/8 oz</b>	60.00		
		<b>Pain</b> 	<b>1/4 oz</b>	100.00		
		<b>Stress</b> 	<b>1/2 oz</b>	175.00		
		Also used to help with Anxiety, Arthritis, Migraines, PMS, and PTSD.			<b>1 oz</b>	350.00
<b>Caramellicious</b>  THC: Up to 21%		<b>Depression</b> 	<b>Gram</b>	15.00		
		<b>Insomnia</b> 	<b>1/16 oz</b>	35.00		
		<b>Nausea</b> 	<b>1/8 oz</b>	50.00		
		<b>Pain</b> 	<b>1/4 oz</b>	75.00		
		<b>Stress</b> 	<b>1/2 oz</b>	150.00		
		Also used to help with Anxiety, Migraines, and PMS.			<b>1 oz</b>	300.00
<b>*CBD Kush</b>  *CBD-Rich Strain: CBD: 7% Avg. THC: 7% Avg.		<b>Anxiety</b> 	<b>Gram</b>	10.00		
		<b>Migraines</b> 	<b>1/16 oz</b>	20.00		
		<b>PMS</b> 	<b>1/8 oz</b>	30.00		
		Also used to help with Depression, Muscle Spasms, Nausea, Stress, Arthritis, ADD/ADHD, and Bipolar Disorder.			<b>1/4 oz</b>	65.00
					<b>1/2 oz</b>	135.00
					<b>1 oz</b>	275.00
<b>*CBD Critical Mass</b>  *CBD-Rich Strain: CBD: 8.13% Avg. THC: 5.49% Avg.		<b>Anxiety</b> 	<b>Gram</b>	10.00		
		<b>Arthritis</b> 	<b>1/16 oz</b>	20.00		
		<b>Migraines</b> 	<b>1/8 oz</b>	30.00		
		<b>ADD/ADHD</b> 	<b>1/4 oz</b>	65.00		
		<b>Bipolar Disorder</b> 	<b>1/2 oz</b>	135.00		
		Also used to help with Depression, Muscle Spasms, Nausea, and Stress.			<b>1 oz</b>	275.00
<b>*CBD Medical Haze</b>  *CBD-Rich Strain: CBD: 8% Avg. THC: 4% Avg.					<b>Gram</b>	20.00
					<b>1/16 oz</b>	40.00
					<b>1/8 oz</b>	60.00
					<b>1/4 oz</b>	100.00
					<b>1/2 oz</b>	175.00
					<b>1 oz</b>	350.00

<b>Chemdawg</b>  CBD: 0.2% THC: Up to 20%  	<b>Anxiety</b>		Gram	20.00
	<b>Migraines</b>		1/16 oz	40.00
	<b>PTSD</b>		1/8 oz	60.00
	<b>ADD/ADHD</b>		1/4 oz	100.00
	<b>Spinal Cord Injury</b>		1/2 oz	175.00
	Also used to help with Chronic Pain and Depression.		1 oz	350.00
<b>*Charlotte's Web</b>  <b>*CBD-Rich Strain:</b> CBD: 75% Avg. THC: 24% Avg.  	<b>Depression</b>		Gram	20.00
	<b>Insomnia</b>		1/16 oz	40.00
	<b>Nausea</b>		1/8 oz	60.00
	<b>Pain</b>		1/4 oz	100.00
	<b>Stress</b>		1/2 oz	175.00
	Used to help with ADD/ADHD, Anxiety, Epilepsy, and Migraines.		1 oz	350.00
<b>Girl Scout Cookies</b>  CBD: 0.7-1% THC: 18-23%  	<b>Anxiety</b>		Gram	15.00
	<b>Migraines</b>		1/16 oz	35.00
	<b>ADD/ADHD</b>		1/8 oz	50.00
	<b>PTSD</b>		1/4 oz	75.00
	<b>PMS</b>		1/2 oz	150.00
	Also used to help with Depression and Pain.		1 oz	300.00
<b>La Blanca</b>  THC: Up to 23%  	<b>Arthritis</b>		Gram	15.00
	<b>Anxiety</b>		1/16 oz	35.00
	<b>Migraines</b>		1/8 oz	50.00
	<b>Pain</b>		1/4 oz	75.00
	<b>PMS</b>		1/2 oz	150.00
	Also used to help with relaxing muscles and increasing appetite.		1 oz	300.00
<b>Larry OG Kush</b>  THC: 18% Avg.  	<b>Depression</b>		Gram	20.00
	<b>Insomnia</b>		1/16 oz	40.00
	<b>Lack of Appetite</b>		1/8 oz	60.00
	<b>Pain</b>		1/4 oz	100.00
	<b>Stress</b>		1/2 oz	175.00
	Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and PTSD.		1 oz	350.00
<b>Light of Jah</b>  THC: Up to 20%  			Gram	15.00
			1/16 oz	35.00
			1/8 oz	50.00
			1/4 oz	75.00
			1/2 oz	150.00
	Used to help with Chronic Pain or similar conditions.		1 oz	300.00

<b>Medijuana</b>  THC: Up to 25%		Used to help with Chronic Pain, Migraines, Sleep Disorders, and treatment for Chemotherapy.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			1/4 oz	100.00
			1/2 oz	175.00
			1 oz	350.00
<b>Mega Jackpot</b>  THC: Up to 25%		<b>Anxiety</b> 	Gram	20.00
		<b>Chronic Pain</b> 	1/16 oz	40.00
		<b>Nausea</b> 	1/8 oz	60.00
		<b>Migraines</b> 	1/4 oz	100.00
		Also used to help with Insomnia.	1/2 oz	175.00
			1 oz	350.00
<b>OG's Kush</b>  THC: 16-24% Avg. THCA: 21% Avg.		<b>Anxiety</b> 	Gram	20.00
		<b>Migraines</b> 	1/16 oz	40.00
		<b>ADD/ADHD</b> 	1/8 oz	60.00
		<b>PMS</b> 	1/4 oz	100.00
		<b>Bipolar Disorder</b> 	1/2 oz	175.00
			1 oz	350.00
<b>Purple OG</b>  CBD: TBD THD: TBD		<b>Depression</b> 	Gram	20.00
		<b>Headaches</b> 	1/16 oz	40.00
		<b>Insomnia</b> 	1/8 oz	60.00
		<b>Pain</b> 	1/4 oz	100.00
		<b>Stress</b> 	1/2 oz	175.00
		Also used to help with Anxiety, Migraines, and PMS.	1 oz	350.00
<b>Sour Diesel</b>  CBD: Medium THC: 19-21%		<b>Anxiety</b> 	Gram	20.00
		<b>Migraines</b> 	1/16 oz	40.00
		<b>ADD/ADHD</b> 	1/8 oz	60.00
		<b>Bipolar Disorder</b> 	1/4 oz	100.00
		<b>PTSD</b> 	1/2 oz	175.00
		Also used to help with Depression, Insomnia, HIV-AIDS, Nausea, Pain, and Stress.	1 oz	350.00
<b>Stacked Kush</b>  CDB: 0.7-1.0% THC: 18-20%		Used to help with Anxiety and Depression.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			1/4 oz	100.00
			1/2 oz	175.00
			1 oz	350.00

<b>Strawberry Cough</b>  CBD: TBD THC: TBD		Anxiety		Gram	20.00
		Migraines		1/16 oz	40.00
		ADD/ADHD		1/8 oz	60.00
		Bipolar Disorder		1/4 oz	100.00
		Gastro. Disorder		1/2 oz	175.00
				1 oz	350.00
<b>Strawberry Ice</b>  THC: 8-15%				Gram	15.00
				1/16 oz	35.00
		Used to help with Stress, Chronic Pain, and Nausea.		1/8 oz	50.00
				1/4 oz	75.00
				1/2 oz	150.00
				1 oz	300.00
<b>Super Nova</b>  TCH: Up to 25%				Gram	20.00
				1/16 oz	40.00
		Used to help with Anorexia, Anxiety, Chronic Pain, and Insomnia.		1/8 oz	60.00
				1/4 oz	100.00
				1/2 oz	175.00
				1 oz	350.00
<b>Super Silver Haze</b>  CBD: 0.01% Avg. CBN: 0.14% Avg. THC: 14.7% Avg.		Anxiety		Gram	15.00
		Migraines		1/16 oz	35.00
		PMS		1/8 oz	50.00
		PTSD		1/4 oz	75.00
		Epilepsy		1/2 oz	150.00
		Also used to help with Depression.		1 oz	300.00
<b>Waikiki Queen</b>  THC: Up to 24%				Gram	15.00
				1/16 oz	35.00
		Used to help with Chronic Pain and Depression.		1/8 oz	50.00
				1/4 oz	75.00
				1/2 oz	150.00
				1 oz	300.00
<b>White Queen</b>  TCH: Up to 25%		Depression		Gram	20.00
		Fatigue		1/16 oz	40.00
		Insomnia		1/8 oz	60.00
		Pain		1/4 oz	100.00
		Stress		1/2 oz	175.00
		Also used to help with Anxiety and Migraines.		1 oz	350.00

<b>White Widow</b>  TCH: Up to 25%  	Depression		Gram	20.00
	Insomnia		1/16 oz	40.00
	Nausea		1/8 oz	60.00
	Pain		1/4 oz	100.00
	Stress		1/2 oz	175.00
	Also used to help with Anxiety, Migraines, PTSD, Gastro. Disorders, and ADD/ADHD.			1 oz

Indica Strains		Treatment	Donation	
<b>Pakistan Chitral Kush</b>  CBD: TBD THC: TBD THCA: TBD  	Used to help with Depression, Mood Enhancement, Relaxing, and Stress.	Gram	20.00	
		1/16 oz	40.00	
		1/8 oz	60.00	
		1/4 oz	100.00	
		1/2 oz	175.00	
		1 oz	350.00	
<b>*Pakistan Valley</b>  *CBD Rich Strain CBD: 7.9% Avg. THC: 21.2% Avg.  	Used to help with Chronic Pain relief.	Gram	15.00	
		1/16 oz	35.00	
		1/8 oz	50.00	
		1/4 oz	75.00	
		1/2 oz	150.00	
		1 oz	300.00	
<b>Purple Kush</b>  CBD: TBD THC: TBD  	Depression		Gram	20.00
	Headaches		1/16 oz	40.00
	Insomnia		1/8 oz	60.00
	Pain		1/4 oz	100.00
	Stress		1/2 oz	175.00
	Also used to help with Anxiety, Cancer, Migraines, ADD/ADHD, PMS, Multiple Sclerosis			1 oz

Sativa Strains		Treatment	Donation	
<b>Jack Herer</b>  CBD: TBD THC: 16% Avg. THCA: 23% Avg.  	Depression		Gram	20.00
	Fatigue		1/16 oz	40.00
	Insomnia		1/8 oz	60.00
	Pain		1/4 oz	100.00
	Stress		1/2 oz	175.00
	Also used to help with Anxiety, Migraines, ADD/ADHD, Gastr. Disorder, and Hypertension			1 oz

**Accessories/Paraphernalia**

Smoking Pipes		
	Item	Donation
Glass Pipes		3.00
Water Pipes		14.99

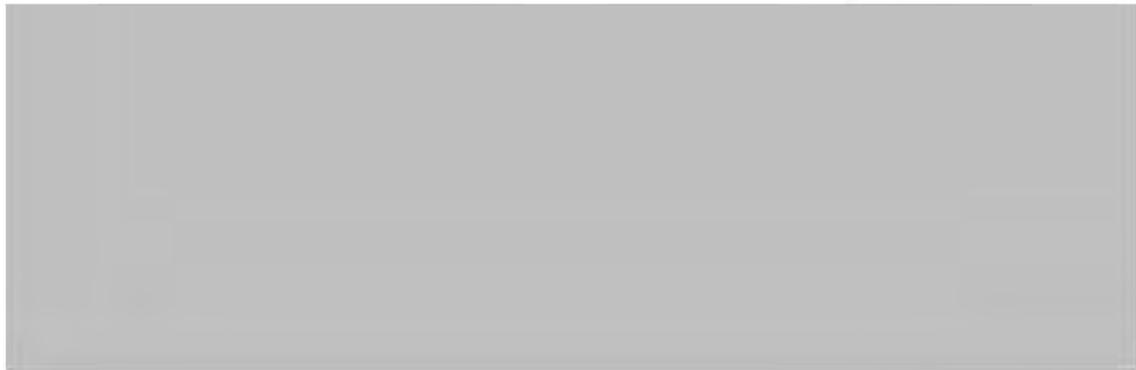
Vaporizers		
	Item	Donation
Cloud V Portable Mini Vaporizer Pen		54.99
V2 Vaporizer Kit		124.99
Vaped Titan Essential Oil and Dry Herb Vapor		244.99

Vaporizers		
Item		Donation
Ego Vape Pen CE4 Starter (510) Kits		24.99
CE4 Style Ego (510 Threaded) 5 pack E-Liquid Atomizers		24.99

Grinders		
Item		Donation
Sweetleaf Cubic Wood Small Square Grinder		13.00
Sweetleaf Aluminum Pocket Size		20.00
Sweetleaf Large Cylindrical Aluminum Grinder		25.00
Sweetleaf Small Cylindrical Aluminum Grinder with Storage		30.00

Wrapping Papers/Blunts		
Item		Donation
<p><b>RAW Organic 1 ½ Rolling Papers 24ct</b></p> <p>Raw rolling papers are a natural unbleached rolling paper that uses no additives and uses a natural sugar based gum. The difference between these and the "Organic" is that the Organic are a hemp based paper, while these are rice based.</p>		26.95
<p><b>Raw Organic Singlewide Rolling Papers 25ct. Box</b></p> <p>Raw rolling papers are a natural unbleached rolling paper that uses no additives and uses a natural sugar based gum. The difference between these and the "Organic" is that the Organic are a hemp based paper, while these are rice based.</p>		26.95
<p><b>Raw Organic 1 1/4 Rolling Papers 12,000 Leaves 40ct. Box</b></p> <p>Raw Organic 1 1/4 rolling papers has a bulk count pack that is the best deal out there. What is unique about this deal is the leaf count. There are 300 leaves per booklet with 40 booklets in a box. That makes a total of 12,000 leaves. That is less than a penny per leaf!! The difference between the regular Raw and the "Organic" is that the Organic are a hemp based paper, while these are rice based.</p>		95.00
<p><b>Raw King-Size Unbleached Cones</b></p> <p>The Raw King-size cones are 100% additive free- 100% organic. Cones are an easy solution for the rolling-challenged. These are completely natural and unbleached. See how transparent they are. There are 32 packs per box, 3 cones per pack, making a total of 96 cones per box!</p>		37.50

Lighters			Donation
	Item		
Bic Lighters			1.00
Mini Bic Lighters (3 pk)			2.50
Slim Bic Lighters w/Child-Guard			1.25
Electronic Bic Lighters w/Child-Guard			2.00



Storage Bags		
Item		Donation
<p><b>Wolf Bag R1</b></p> <p>Wallet style stash bag. Made from green hemp and fastened by large strip of Velcro. Internal zip pocket for your stash and tobacco, pocket for skins and one for rolling tray (included).</p> <p>Colors Available: Black; Khaki</p> <p>Dimensions 14cm x 5cm x 2.5cm</p>		8.99
<p><b>Wolf Bag R2</b></p> <p>Wallet style stash bag. Made from green hemp and fastened by large strip of Velcro. Internal zip pocket for your stash and tobacco, pocket for skins and one for rolling tray (included).</p> <p>Colors Available: Black; Khaki</p> <p>Dimensions 14cm x 9cm x 2.5cm</p>		11.99
<p><b>Wolf Bag S1</b></p> <p>A great way to keep your gear together. Keep it all together in a green hemp bag. Designed and made by Wolf! Pocket for skins and Large W joint maker (included).</p> <p>Colors Available: Black; Khaki; Blue; Pink</p> <p>Dimensions 14cm x 5cm x 2.5cm</p>		5.50
<p><b>Wolf Bag S2</b></p> <p>Multi Pocket Stash Bag. Made from quality hemp, the S2 is a tough zippable stash bag. Large internal pockets for stash/tobacco, one for skins and a third for the W shaped rolling tray which is included.</p> <p>Colors Available: Black; Khaki</p> <p>Dimensions 14cm x 9cm x 2.5cm</p>		9.99
<p><b>Wolf Bag S3</b></p> <p>The biggest of the Wolf range! Giant rolling bag. Room for lots of everything! Made from green hemp, with a sturdy Zip. 6 internal pockets. Two zip up stash/tobacco pockets, plus two for roach/tip material as well as a pocket for skins and one for rolling tray.</p> <p>Colors Available: Black; Khaki</p> <p>Dimensions 22cm x 9cm x 2.5cm</p>		15.50

Storage Boxes		
Item		Donation
<p><b>Wolf T1 Deluxe Stash Box</b></p> <p>Papers can be stored in the lid, leaving two more compartments for tobacco and anything else you would like to add. Front part box has a V profile for assembly and rolling. All deluxe wolf boxes are made from Red Birch wood. Price does not include contents.</p> <p>Dimensions 14cm x 5 cm x 3 cm</p>		14.50
<p><b>Wolf T2 Deluxe Stash Box</b></p> <p>Very similar to the T1 deluxe but with a removable V profile and with larger storage areas. Papers still fit into the lid. Extra compartment under the V profile for storage of dried herbs. Made from stunning Red Birch wood. Price does not include contents.</p> <p>Dimensions 15cm x 8 cm x 4 cm</p>		23.00
<p><b>Wolf T2L Deluxe Stash Box</b></p> <p>A slightly larger version of the T2 Deluxe, with room to store a dried herb/seed grinder. Price does not include contents.</p> <p>Dimensions 17.5cm x 12cm x 5cm</p>		29.99
<p><b>Wolf T3 Deluxe Stash Box</b></p> <p>Large 3 compartment stash box. Skins can be stored in the lid. Magnetically held in position V section, can be slid to reveal a 4th compartment. There is room to store a large grinder and everything else you might need. Price does not include contents.</p> <p>Dimensions 17cm x 15cm x 5cm</p>		33.00

Cleaning Products		
Item		Donation
<b>420 Sanitizing Wipes</b> Easily sterilizes the mouthpiece of pipes or vaporizers; 100 wipes per box.		6.95
<b>Smoke Soap (8oz)</b> Concentrated organic cleaner for pipes that does not contain harsh solvents like alcohol or acetone; biodegradable as it's made from environmentally sustainable ingredients such as soy and natural oils.		10.95
<b>RezBlock Concentrate</b> Keeps resin from building up in water pipes; bottle contains up to 60 uses.		13.95
<b>OCD Bundle</b> <ul style="list-style-type: none"> <li>• 8oz Bottle of Smoke Soap</li> <li>• 1 Bottle of RezBlock</li> <li>• 1 Box of 420 Wipes</li> </ul>		21.85



## 7. Future Plans

As a not-for-profit organization, Guided Steps Compassion Center will offer the following, but not limited to, programs and services to patients at no cost or small nominal fee.

- **Educational Programs**
  - Becoming a Cannabis Patient
  - Delaware Code Section 1121: Patient's Rights
  - HIPPA
  - Medical Cannabis Strains, Treatments, and Usage
  - Pain Management

Guided Steps Compassion Center will offer "live streamed" classes to registered patients who are disabled and/or bedridden and are unable to attend in person. After reserving their place for the on-line class, patients will be required to enter their Registry ID Card Number in order for them to access the course. Stringent security measures to validate patient information will be developed, tested, and in place before the on-line classes are rolled out.

- **Wellness Therapy Services**
  - **Chiropractic Services**
    - Used to help manage relief of:
      - Back and Neck Conditions
      - Leg Pain (Sciatica)
      - Knee, Foot and Ankle Pain
      - Shoulder or Elbow Pain
      - Arm or Wrist Pain
      - Carpal Tunnel Syndrome
      - Migraine and Tension Headaches
      - High blood pressure
      - Sleep disorders
      - Repetitive Stress Disorders
      - Stress and Tension Disorders
      - Fibromyalgia
      - Bursitis
      - Arthritis
      - Chronic Injuries
    - Also helps with:
      - Improve Nervous System Function
      - Relieve Prenatal Discomfort
      - Increase Vitality and Improve Quality of Life
      - Provide Preventative Care
      - Improve Overall
      - Health and Wellness for both children and adults
  - **Massage Therapy**
    - Benefits of massage therapy:
      - Ease medication dependence.
      - Enhance immunity by stimulating lymph flow—the body's natural defense system.
      - Exercise and stretch weak, tight, or atrophied muscles.
      - Improve the condition of the body's largest organ—the skin.
      - Increase joint flexibility.
      - Lessen depression and anxiety.
      - Promote tissue regeneration, reducing scar tissue and stretch marks.
      - Pump oxygen and nutrients into tissues and vital organs, improving circulation.
      - Reduce post surgery adhesions and swelling.
      - Reduce spasms and cramping.
      - Relax and soften injured, tired, and overused muscles.

- Release endorphins—amino acids that work as the body's natural painkiller.
- Relieve migraine pain.
- **Acupuncture**
  - Acupuncture is one of the main forms of treatment in traditional Chinese medicine. It involves the use of sharp, thin needles that are inserted in the body at very specific points. This process is believed to adjust and alter the body's energy flow into healthier patterns, and is used to treat a wide variety of illnesses and health conditions.
- **Reflexology**
  - Reflexology is a therapeutic method of relieving pain by stimulating predefined pressure points on the feet and hands. This controlled pressure alleviates the source of the discomfort. In the absence of any particular malady or abnormality, reflexology may be as effective for promoting good health and for preventing illness as it may be for relieving symptoms of stress, injury, and illness.
  - Reflexologists work from maps of predefined pressure points that are located on the hands and feet. These pressure points are reputed to connect directly through the nervous system and affect the bodily organs and glands. The reflexologist manipulates the pressure points according to specific techniques of reflexology therapy. By means of this touching therapy, any part of the body that is the source of pain, illness, or potential debility can be strengthened through the application of pressure at the respective foot or hand location.
- **Reiki**
  - Reiki is a form of therapy that uses simple hands-on, no-touch, and visualization techniques, with the goal of improving the flow of life energy in a person. Reiki (pronounced *ray-key*) means "universal life energy" in Japanese, and Reiki practitioners are trained to detect and alleviate problems of energy flow on the physical, emotional, and spiritual level. Reiki touch therapy is used in much the same way to achieve similar effects that traditional massage therapy is used—to relieve stress and pain, and to improve the symptoms of various health conditions.
  - Some of the Reiki healing health benefits:
    - Creates deep relaxation and aids the body to release stress and tension,
    - Accelerates the body's self-healing abilities,
    - Aids better sleep,
    - Reduces blood pressure
    - Can help with acute (injuries) and chronic problems (asthma, eczema, headaches, etc.) and aides the breaking of addictions,
    - Helps relieve pain,
    - Removes energy blockages, adjusts the energy flow of the endocrine system bringing the body into balance and harmony,
    - Assists the body in cleaning itself from toxins,
    - Reduces some of the side effects of drugs and helps the body to recover from drug therapy after surgery and chemotherapy,
    - Supports the immune system,
    - Increases vitality and postpones the aging process,
    - Raises the vibrational frequency of the body,
    - Helps spiritual growth and emotional clearing
- **Jin Shin Jyutsu**
  - A Japanese form of acupressure based on gentle touching and cradling of the body rather than massage; the practitioner identifies zones of compromised flow of energy chi (life force) by pulse diagnosis and then attempts to harmonize the body, mind and spirit, simultaneously touching a combination of 2 of 26 "safety energy locks" located along the body's energy pathways so as to redirect the patient's intrinsic life forces to unblock the flow of energy.

- Experts estimate that upwards of ninety percent of disease is stress-related. And perhaps nothing ages us faster, internally and externally, than high stress. Jin Shin Jyutsu is an effective tool for managing this stress, which translates into:
  - Decreased anxiety,
  - Enhanced sleep quality,
  - Greater energy,
  - Improved concentration,
  - Increased circulation,
  - Reduced fatigue.
- Jin Shin Jyutsu can also help specifically address a number of health issues, such as:
  - Alleviate low-back pain and improve range of motion,
  - Enhance immunity by stimulating lymph flow—the body's natural defense system,
  - Help cancer patients with symptoms from chemotherapy,
  - Improve the condition of the body's largest organ—the skin,
  - Increase joint flexibility,
  - Lessen depression and anxiety,
  - Promote regeneration,
  - Improving circulation and breathing,
  - Reduce post-surgery adhesions and swelling,
  - Reduce spasms and cramping,
  - Relax and soften tired, overused muscles,
  - Relieve migraine pain.
- **Health Coach Counseling**
  - A Health Coach will guide and mentor patients, empowering them to take responsibility for their own health, and support them to implement and sustain lifestyle and behavior changes that will contribute to the achievement of their personal wellness goals.
  - Some common areas a Health Coach will help a patient to focus include:
    - Stress management
    - Weight management
    - Food cravings
    - Digestion
    - Sleep
    - Energy
  - A Health Coach does not diagnose, treat, or take the place of any medical practitioner; rather serves as the missing link (the patient guide) that helps develop strategies to enact real, lasting lifestyle changes that address not only the diagnostic label (i.e. pre-diabetic), but also serves to enhance the patient's overall wellness.

Guided Steps will set aside a percentage of revenue to be donated to the following:

- Local township charity and redevelopment programs:
  - Town of Smyrna – 10%
- State of Delaware charity and redevelopment programs TBD%
- Development of Veterans Housing Program for disabled veterans – 10%
  - Program dedicated to building modified homes for disabled veterans

Plans for these services and programs will be determined once the center's revenue has been established.



Business Plan

Guided Steps Compassion Center will also hold fund raising events throughout the year. Examples of these events include:

- Bud Ball
  - Annual formal fundraising event (e.g. silent auction; well-known entertainment; etc.)
- Bud-B-Q
  - Annual barbeque with food, games, activities and giveaways for patients/caregivers and their families to celebrate their health and wellness.
- Well-known health and wellness speakers

Funds raised from these events will be used to:

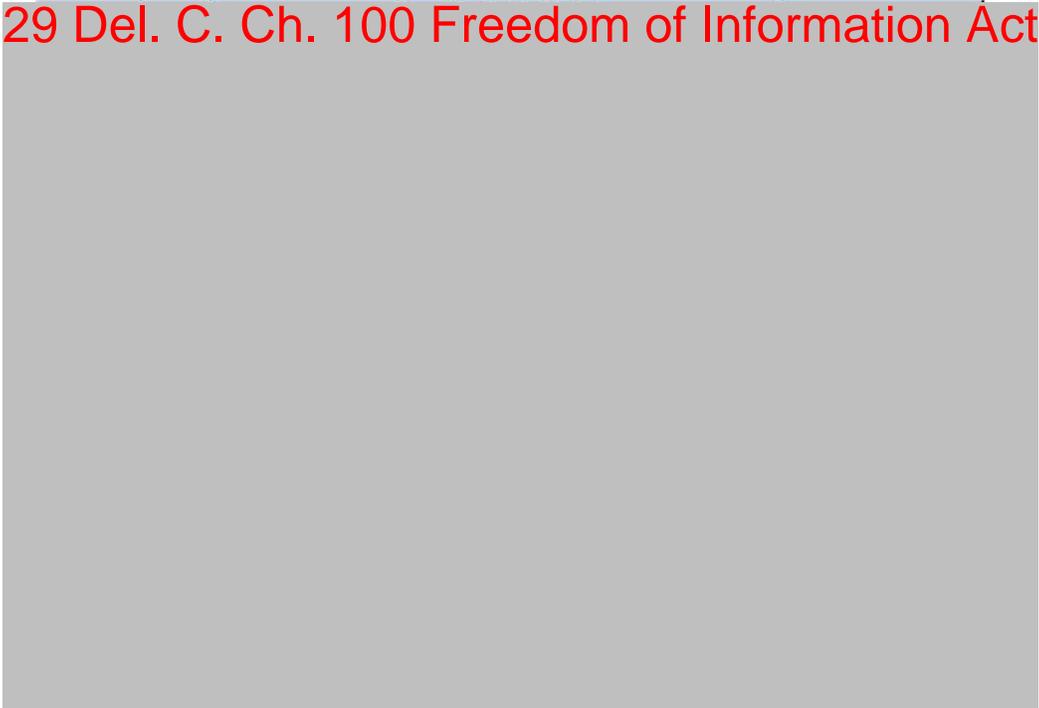
- Cover expenses for the therapeutic and educational programs.
- Donate to local community and State of Delaware charity and redevelopment programs.
- Reduce medical marijuana costs in order to make more affordable for patients.

Upon renewal of DHSS Medical Marijuana Program certification, Guided Steps will look to purchase/lease land for a custom built facility which will better serve the Center's operational needs, as well as the needs of our patients.

**8. Funding Request**

Guided Steps Compassion Center is requesting the following breakdown for start-up funds:

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**9. Financial Projections**

Guided Steps Compassion Center income projection is based on patients purchasing total allowable amount of medical marijuana per month, which is 6 ounces. With Guided Steps' various strains and pricing, the cost per ounce averages out to \$332.81. However, to establish a base income level, the cost was rounded down to \$300/per ounce.

Indica	g	1/16oz	1/8oz	1/4oz	1/2oz	1oz
Pakistan Chitral Kush	20.00	40.00	60.00	100.00	175.00	350.00
Pakistan Valley	15.00	35.00	50.00	75.00	150.00	300.00
Purple Kush	20.00	40.00	60.00	100.00	175.00	350.00
Sativa	g	1/16oz	1/8oz	1/4oz	1/2oz	1oz
Jack Herer	20.00	40.00	60.00	100.00	175.00	350.00
Hybrid	g	1/16oz	1/8oz	1/4oz	1/2oz	1oz
Blue Cheese	20.00	40.00	60.00	100.00	175.00	350.00
Blue Chemdawg	20.00	40.00	60.00	100.00	175.00	350.00
Blue Dream	20.00	40.00	60.00	100.00	175.00	350.00
Bubba Kush	20.00	40.00	60.00	100.00	175.00	350.00
California Dream	20.00	40.00	60.00	100.00	175.00	350.00
Caramelicious	15.00	35.00	50.00	75.00	150.00	300.00
CBD Kush	10.00	20.00	30.00	65.00	135.00	275.00
CDB Critical Mass	10.00	20.00	30.00	65.00	135.00	275.00
CBD Medical Haze	20.00	40.00	60.00	100.00	175.00	350.00
Chemdawg	20.00	40.00	60.00	100.00	175.00	350.00
Charlotte's Web	20.00	40.00	60.00	100.00	175.00	350.00
Girl Scout Cookies	15.00	35.00	50.00	75.00	150.00	300.00
La Blanca	15.00	35.00	50.00	75.00	150.00	300.00
Larry OG Kush	20.00	40.00	60.00	100.00	175.00	350.00
Light of Jah	15.00	35.00	50.00	75.00	150.00	300.00
Medjuana	20.00	40.00	60.00	100.00	175.00	350.00
Mega Jackpot	20.00	40.00	60.00	100.00	175.00	350.00
OG's Kush	20.00	40.00	60.00	100.00	175.00	350.00
Purple OG	20.00	40.00	60.00	100.00	175.00	350.00
Sour Diesel	20.00	40.00	60.00	100.00	175.00	350.00
Stacked Cush	20.00	40.00	60.00	100.00	175.00	350.00
Strawberry Cough	20.00	40.00	60.00	100.00	175.00	350.00
Strawberry Ice	15.00	35.00	50.00	75.00	150.00	300.00
Super Nova	20.00	40.00	60.00	100.00	175.00	350.00
Super Nova Haze	15.00	35.00	50.00	75.00	150.00	300.00
Waikiki Queen	15.00	35.00	50.00	75.00	150.00	300.00
White Queen	20.00	40.00	60.00	100.00	175.00	350.00
White Widow	20.00	40.00	60.00	100.00	175.00	350.00
Average Prices	g	1/16oz	1/8oz	1/4oz	1/2oz	1oz
	18.13	37.50	55.63	91.56	166.25	332.81



Business Plan

Guided Steps Compassion Center's income and expenses will be as follows:

**Scenario 1**

P&L based on low # of patients purchasing 3 ounces only per month (at \$300/per oz.) in order to establish revenue pattern as total number of registered patients is unknown at this time.

INCOME	1st Yr (6 Months)	2nd Yr	3rd Yr	1st Year (Jul-Dec)	# of Patients	*Sales	Total
				Jul	0		
				Aug	0		
				Sep	0		
				Oct	100		
				Nov	200		
				Dec	300		
				<b>TOTAL</b>	<b>600</b>		

MONTHLY INCOME

EXPENSES

PROFIT/LOSS

2nd Year	# Patients	*Sales	Total
Jan	400		
Feb	500		
Mar	600		
Apr	700		
May	800		
Jun	900		
Jul	1,000		
Aug	1,100		
Sep	1,200		
Oct	1,300		
Nov	1,400		
Dec	1,500		
<b>TOTAL</b>	<b>11,400</b>		

3rd Year	# Patients	*Sales	Total
Jan	1,600		
Feb	1,700		
Mar	1,800		
Apr	1,900		
May	2,000		
Jun	2,100		
Jul	2,200		
Aug	2,300		
Sep	2,400		
Oct	2,500		
Nov	2,600		
Dec	2,700		
<b>TOTAL</b>	<b>25,800</b>		

\*Does not include sales from paraphernalia/accessories

BREAKDOWN	1st Yr	2nd Yr	3rd Yr
Income			
Expenses			
<b>PROFIT/LOSS</b>			

\*Revenue does not include income from paraphernalia sales or fundraising campaigns.

**\*1st year limitations:**

6 months only (Jul-Dec)

0 revenue generated during 3 month grow time

3 months (Oct/Nov) to generate revenue



Business Plan

**Scenario 2**

P&L based on low # of patients purchasing between 3-5ozs only per month (at \$300/per oz.) in order to establish revenue pattern as total number of registered patients is unknown at this time.

INCOME	1st Yr (6 Months)	2nd Yr	3rd Yr	1st Year (Jul-Dec)	# of Patients	Sales	Total
29 Del.C. Ch. 100 Freedom of Information Act							
				Jul	0		
				Aug	0		
				Sep	0		
				Oct	100		
				Nov	200		
				Dec	300		
				<b>TOTAL</b>	<b>600</b>		

MONTHLY INCOME	1st Yr*	2nd Yr	3rd Yr
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2nd Year	# Patients	Sales	Total
29 Del.C. Ch. 100 Freedom of Information Act			
Jan	400		
Feb	500		
Mar	600		
Apr	700		
May	800		
Jun	900		
Jul	1,000		
Aug	1,100		
Sep	1,200		
Oct	1,300		
Nov	1,400		
Dec	1,500		
<b>TOTAL</b>	<b>11,400</b>		

3rd Year	# Patients	Sales	Total
29 Del.C. Ch. 100 Freedom of Information Act			
Jan	1,600		
Feb	1,700		
Mar	1,800		
Apr	1,900		
May	2,000		
Jun	2,100		
Jul	2,200		
Aug	2,300		
Sep	2,400		
Oct	2,500		
Nov	2,600		
Dec	2,700		
<b>TOTAL</b>	<b>25,600</b>		

\*Does not include sales from paraphernalia/accessories

BREAKDOWN	1st Yr	2nd Yr	3rd Yr
Income	29 Del.C. Ch. 100 Freedom of Information Act		
Expenses			
<b>PROFIT/LOSS</b>			
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\*Revenue does not include income from paraphernalia sales or fundraising campaigns.

**\*1st year limitations:**

- 6 months only (Jul-Dec)
- 0 revenue generated during 3 month grow time
- 3 months (Oct/Nov) to generate revenue



Business Plan

**Scenario 3**

P&L based on low # of patients purchasing total allowable 6 ozs. only per month (at \$300/per oz.) in order to establish revenue pattern as total number of registered patients is unknown at this time.

INCOME	1st Yr (6 Months)	2nd Yr	3rd Yr	1st Year (Jul-Dec)	# of Patients	Allowable Sales*	Total
				Jul	0	29 Del.C. Ch. 100 Freedom of Information Act	
				Aug	0		
				Sep	0		
				Oct	100		
				Nov	200		
				Dec	300		
				<b>TOTAL</b>	<b>600</b>		

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2nd Year	# Patients	Allowable Sales	Total
Jan	400	29 Del.C. Ch. 100 Freedom of Information Act	
Feb	500		
Mar	600		
Apr	700		
May	800		
Jun	900		
Jul	1,000		
Aug	1,100		
Sep	1,200		
Oct	1,300		
Nov	1,400		
Dec	1,500		
<b>TOTAL</b>	<b>11,400</b>		

3rd Year	# Patients	Allowable Sales	Total
Jan	1,600	29 Del.C. Ch. 100 Freedom of Information Act	
Feb	1,700		
Mar	1,800		
Apr	1,900		
May	2,000		
Jun	2,100		
Jul	2,200		
Aug	2,300		
Sep	2,400		
Oct	2,500		
Nov	2,600		
Dec	2,700		
<b>TOTAL</b>	<b>25,800</b>		

\*Allowable Sales = 6 ozs per patient @ avg of \$300 per oz  
Does not include sales from paraphernalia/accessories

BREAKDOWN	1st Yr	2nd Yr	3rd Yr
Income			
Expenses			
<b>PROFIT/LOSS</b>			

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\*Revenue does not include income from paraphernalia sales or fundraising campaigns.

**\*1st year limitations:**

- 6 months only (Jul-Dec)
- 0 revenue generated during 3 month grow time
- 3 months (Oct/Nov) to generate revenue



Business Plan

**Projected Revenue Based On  
Delaware Medical Marijuana Statistics**

**Scenario 1**

Year Law Passed 2011  
Approved Patients\* 88,872  
3 oz per patient @ \$300/oz \$900

% of Approved Patients	1%	2%	3%	4%	5%	6%	7%	8%	9%	10%
Total Patients	889	1,777	2,666	3,555	4,444	5,332	6,221	7,110	7,998	8,887

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% of Approved Patients	11%	12%	13%	14%	15%	16%	17%	18%	19%	20%
Total Patients	9,776	10,665	11,553	12,442	13,331	14,220	15,108	15,997	16,886	17,774

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% of Approved Patients	21%	22%	23%	24%	25%	26%	27%	28%	29%	30%
Total Patients	18,663	19,552	20,441	21,329	22,218	23,107	23,995	24,884	25,773	26,662

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% of Approved Patients	31%	32%	33%	34%	35%	36%	37%	38%	39%	40%
Total Patients	27,550	28,439	29,328	30,216	31,105	31,994	32,883	33,771	34,660	35,549

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% of Approved Patients	41%	42%	43%	44%	45%	46%	47%	48%	49%	50%
Total Patients	36,438	37,326	38,215	39,104	39,992	40,881	41,770	42,659	43,547	44,436

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% of Approved Patients	51%	52%	53%	54%	55%	56%	57%	58%	59%	60%
Total Patients	45,325	46,213	47,102	47,991	48,880	49,768	50,657	51,546	52,434	53,323

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% of Approved Patients	61%	62%	63%	64%	65%	66%	67%	68%	69%	70%
Total Patients	54,212	55,101	55,989	56,878	57,767	58,656	59,544	60,433	61,322	62,210

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% of Approved Patients	71%	72%	73%	74%	75%	76%	77%	78%	79%	80%
Total Patients	63,099	63,988	64,877	65,765	66,654	67,543	68,431	69,320	70,209	71,098

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% of Approved Patients	81%	82%	83%	84%	85%	86%	87%	88%	89%	90%
Total Patients	71,986	72,875	73,764	74,652	75,541	76,430	77,319	78,207	79,096	79,985

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% of Approved Patients	91%	92%	93%	94%	95%	96%	97%	98%	99%	100%
Total Patients	80,874	81,762	82,651	83,540	84,428	85,317	86,206	87,095	87,983	177,744

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Business Plan

**Scenario 2**

Year Law Passed 2011  
Approved Patients 88,872  
6 oz per patient @ \$300/oz \$1,800

% of Approved Patients	1%	2%	3%	4%	5%	6%	7%	8%	9%	10%
Total Patients	889	1,777	2,666	3,555	4,444	5,332	6,221	7,110	7,998	8,887

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	11%	12%	13%	14%	15%	16%	17%	18%	19%	20%
Total Patients	9,776	10,665	11,553	12,442	13,331	14,220	15,108	15,997	16,886	17,774

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	24%	22%	23%	24%	25%	26%	27%	28%	29%	30%
Total Patients	18,663	19,552	20,441	21,329	22,218	23,107	23,995	24,884	25,773	26,662

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	31%	32%	33%	34%	35%	36%	37%	38%	39%	40%
Total Patients	27,550	28,439	29,328	30,216	31,105	31,994	32,883	33,771	34,660	35,549

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	41%	42%	43%	44%	45%	46%	47%	48%	49%	50%
Total Patients	36,438	37,326	38,215	39,104	39,992	40,881	41,770	42,659	43,547	44,436

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	51%	52%	53%	54%	55%	56%	57%	58%	59%	60%
Total Patients	45,325	46,213	47,102	47,991	48,880	49,768	50,657	51,546	52,434	53,323

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	61%	62%	63%	64%	65%	66%	67%	68%	69%	70%
Total Patients	54,212	55,101	55,989	56,878	57,767	58,656	59,544	60,433	61,322	62,210

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	74%	72%	73%	74%	75%	76%	77%	78%	79%	80%
Total Patients	63,099	63,988	64,877	65,765	66,654	67,543	68,431	69,320	70,209	71,098

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	81%	82%	83%	84%	85%	86%	87%	88%	89%	90%
Total Patients	71,986	72,875	73,764	74,652	75,541	76,430	77,319	78,207	79,096	79,985

29 Del.C. Ch. 100 Freedom of Information Act

% of Approved Patients	91%	92%	93%	94%	95%	96%	97%	98%	99%	100%
Total Patients	80,874	81,762	82,651	83,540	84,428	85,317	86,206	87,095	87,983	177,744

29 Del.C. Ch. 100 Freedom of Information Act



Business Plan

**Scenario 3**

Year Law Passed 2011 29 Del.C. Ch. 100 Freedom of Information Act  
Approved Patients\* 88,872  
6 oz per patient @ \$300/oz

\*Based on TOTAL number of \*Approved Patients\*

Approved Patients Increase %	1%	2%	3%	4%	5%	6%	7%	8%	9%	10%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	889	1,777	2,666	3,555	4,444	5,332	6,221	7,110	7,998	8,887
TOTAL Patients	89,761	90,649	91,537	92,425	93,313	94,201	95,089	95,977	96,865	97,753

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	11%	12%	13%	14%	15%	16%	17%	18%	19%	20%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	9,776	10,665	11,553	12,442	13,331	14,220	15,109	15,997	16,886	17,774
TOTAL Patients	98,648	99,537	100,425	101,313	102,201	103,089	103,977	104,865	105,753	106,641

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	21%	22%	23%	24%	25%	26%	27%	28%	29%	30%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	18,863	19,752	20,641	21,529	22,418	23,307	24,195	25,084	25,973	26,862
TOTAL Patients	107,735	108,624	109,512	110,401	111,289	112,177	113,065	113,954	114,842	115,731

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	31%	32%	33%	34%	35%	36%	37%	38%	39%	40%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	27,550	28,439	29,328	30,216	31,105	31,994	32,883	33,771	34,660	35,549
TOTAL Patients	116,422	117,311	118,200	119,088	119,977	120,865	121,754	122,642	123,531	124,420

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	41%	42%	43%	44%	45%	46%	47%	48%	49%	50%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	36,438	37,326	38,215	39,104	39,992	40,881	41,770	42,659	43,547	44,436
TOTAL Patients	125,310	126,198	127,087	127,975	128,864	129,752	130,641	131,530	132,418	133,307

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	51%	52%	53%	54%	55%	56%	57%	58%	59%	60%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	45,325	46,213	47,102	47,991	48,880	49,768	50,657	51,546	52,434	53,323
TOTAL Patients	134,197	135,085	135,974	136,862	137,751	138,640	139,528	140,417	141,305	142,194

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	61%	62%	63%	64%	65%	66%	67%	68%	69%	70%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	54,212	55,101	55,989	56,878	57,767	58,656	59,544	60,433	61,322	62,210
TOTAL Patients	143,084	143,972	144,861	145,750	146,638	147,527	148,415	149,304	150,192	151,081

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	71%	72%	73%	74%	75%	76%	77%	78%	79%	80%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	63,099	63,988	64,877	65,765	66,654	67,543	68,431	69,320	70,209	71,098
TOTAL Patients	151,971	152,859	153,747	154,636	155,524	156,413	157,301	158,190	159,078	159,967

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	81%	82%	83%	84%	85%	86%	87%	88%	89%	90%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	71,386	72,275	73,164	74,052	74,941	75,830	76,719	77,607	78,496	79,385
TOTAL Patients	160,258	161,146	162,034	162,923	163,811	164,700	165,588	166,477	167,365	168,254

29 Del.C. Ch. 100 Freedom of Information Act

Approved Patients Increase %	91%	92%	93%	94%	95%	96%	97%	98%	99%	100%
2011 Approved Patient Count	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872	88,872
% Increase Number of Patients	80,874	81,762	82,651	83,540	84,428	85,317	86,206	87,095	87,983	88,872
TOTAL Patients	169,746	170,634	171,523	172,411	173,300	174,188	175,077	175,965	176,854	177,742

29 Del.C. Ch. 100 Freedom of Information Act



Business Plan



2015 Expense Summary

Category	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	TOTALS	Mo Avgs	% of Expenses
29 Del.C. Ch. 100 Freedom of Information Act															

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Business Plan



2016 Expense Summary

Category	2016 Expense Summary												Mo. Aves	% of Expense
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec		
29 Del.C. Ch. 100 Freedom of Information Act														

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Business Plan

Salary Structure

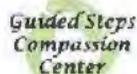
Description	Jul - Dec 2014		Jan - Dec 2015		Jan - Dec 2016	
	# FTEs	6 Months	# FTEs	Total	# FTEs	Total
29 Del.C. Ch. 100 Freedom of Information Act						
<b>TOTAL</b>	29 Del.C. Ch. 100 Freedom of Information Act					
Monthly Breakdown						

Executive Management	Annual Salary	# FTEs	Mo Sal	# Mos.	6 Months	# FTEs	1st Year (10% Increase)	# FTEs	2nd Year (10% Increase)
29 Del.C. Ch. 100 Freedom of Information Act									
<b>TOTAL</b>	29 Del.C. Ch. 100 Freedom of Information Act								

Development/Production	Annual Salary	# FTEs	Mo Sal	# Mos.	6 Months	# FTEs	1st Year (10% Increase)	# FTEs	2nd Year (10% Increase)
29 Del.C. Ch. 100 Freedom of Information Act									
<b>TOTAL</b>	29 Del.C. Ch. 100 Freedom of Information Act								

Operations	Annual Salary	# FTEs	Mo Sal	# Mos.	6 Months	# FTEs	1st Year (10% Increase)	# FTEs	2nd Year (10% Increase)
29 Del.C. Ch. 100 Freedom of Information Act									
<b>TOTAL</b>	29 Del.C. Ch. 100 Freedom of Information Act								

**Rationalization for higher salaries, sign-on and end-of-year bonuses:**  
 Recruit and maintain quality, hardworking, honest, dependable, dedicated employees  
 Potential employees will most likely be coming from already established jobs  
 Potential employees will be leaving established job to work in a new, ground-breaking, risky field  
 Sign-on bonuses will be determined based on position being filled, employee's knowledgebase and skillset  
 End-of-year bonuses will be based on employee performance  
 Incentive and motivation to establish and maintain high employee morale  
 High employee morale = happy employees = productive employees



## Appendix A – Bios & Resumes

**Fabian B. Livingston**  
**Founder and President,**  
**Guided Steps Compassion Center**

Fabian B. Livingston is the Founder and President of Guided Steps Compassion Center. Mr. Livingston is a philanthropist, veteran supporter, entrepreneur, and successful business owner over the last 15 years; he is currently the owner of a barbershop franchise, "It's All In The Wrist", located in Smyrna and Milford, Delaware. Upon learning of the State of Delaware's approval to open a Compassion Center, Mr. Livingston chose to pursue his dream of helping others take steps towards achieving better health and wellness as he has through the benefits of medical cannabis.

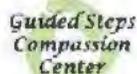
Mr. Livingston's life journey took a turn in 1989 when he enlisted in the Army and proudly served his country for over 2 years. While on tour in Saudi Arabia, he was seriously injured during combat and hospitalized. This life-altering event left him to experience outbursts of anger, difficulty concentrating, difficulty expressing his thoughts and feelings, along with physical aches and pains for nearly 16 years. Feeling lost after such a long period of time, Mr. Livingston finally sought advice from his doctor who officially diagnosed him with Post-Traumatic Stress Disorder (PTSD), and prescribed pharmaceuticals to help combat the symptoms. Unfortunately, none of the medication helped alleviate the PTSD, instead made feel worse.

In 2011, after hearing of the many benefits of medical cannabis in treating PTSD, Mr. Livingston went to Seattle, Washington, to learn more. He became knowledgeable of the Cannabinoid receptors and Endocannabinoid system, their effects on the brain, and how they help relieve the symptoms of PTSD. After struggling for almost 20 years, he finally felt as if there was light at the end of the tunnel. Hearing of the Delaware Medical Marijuana Pilot Compassion Center in 2013 enforced that feeling; he knew he has just heard his calling.

Strong from surviving his past, experienced from having his own successful businesses, knowledgeable from continued education and research (Cannabis University; other programs) on medical cannabis, and passionate about helping others (especially veterans), Mr. Livingston made the courageous decision to follow that calling and pursue opening Delaware's first Compassion Center.

Throughout 2013, Mr. Livingston continued his education of medical cannabis with Cannabis Training University where he trained in marijuana horticulture, cooking with marijuana, bud tender training, marijuana laws, how to open a dispensary and delivery service, and marijuana as medicine; receiving his Certificate of Completion in March 2014.

Mr. Livingston's dedication to helping others and his community will be clearly evident as he strives to influence society in positive ways through innovative and creative ideas which will bring about exciting opportunities for youths, veterans, and seniors, as well as contribute to the continued growth and strength of the community.



Business Plan

**Ramane O. Jones, Sr.**  
**Vice-President of Development & Production**  
**Co-Founder of Guided Steps Compassion Center**

Ramane Jones, Sr. is the Vice-President of Development & Production and Co-Founder of the Guidance Steps Compassion Center. Mr. Jones has led a distinguished career in business for over 15 years, and looks to extend his professional success into the development of the first non-profit compassion center in the State of Delaware.

Mr. Jones has a huge passion in business building. In Mr. Jones earlier years, he created DelVal Communications, a communications installation company. Mr. Jones built DelVal into a million dollar operation that provided major cabling contracting installations throughout Delaware, Pennsylvania, and New Jersey area. Overseeing a team at peak operations of over 30 licensed cabling technicians, Mr. Jones has the skills to manage personnel and budget in the highly competitive building trades. After being out of the communications arena for several years, Mr. Jones implemented systems that are currently being used by DirecTV with their day-to-day operations.

Mr. Jones has built a steady commercial cleaning company, Jones Integrity, as well as an organic coffee distribution company which services the United States, Australia, and various countries around the world. While management oversight of the company is Mr. Jones's primary day-to-day responsibility, he is not immune to hard work. He takes great pride in his hands-on approach to his company, and will enlist a similar style as a key operator of Guidance Steps.

Mr. Jones' true passion is his boarding home, Heavenly Arms, a home for mental health and retired veterans. He has been operating this small, but caring business for over 15 yrs. While operating the company, Mr. Jones has seen a lot of patients come and go. While interacting with the clients, Mr. Jones is responsible for administrating several types of medical depressant drugs. These drugs suppress the clients' behavior, but the side effects appeared to deteriorate their bodies and thinking capacity. After watching his clients go through these various changes, Mr. Jones is compelled to service these individual by finding an alternative way to help them.

Mr. Jones' interest in operating a compassion center in Delaware is intensely personal. Like many who are attracted to the medical cannabis movement, his involvement stems from a personal experience with a loved one who was sick. Mr. Jones' late father, Peter Jones, endured a long yet dignified fight with AIDS in the early days of his life. Mr. Peter was the focal point for the entire Jones family, and his struggle with the disease left a lasting imprint. During his treatments, doctors indicated that medical cannabis may be a viable option for pain relief. Because the drug was illegal at time the option was never pursued. Following his death, Mr. Jones was left wondering if medical cannabis could have in some way alleviated his father's pain and suffering.

Mr. Jones' combination of business acumen, knowledge of the mental health field, and deep commitment to helping patients, serves as the backbone of his pursuit of the compassion center license. He looks forward to building a center that is a beacon of light for patients throughout Delaware and he plans to do so with his father's spirit close at hand with Guided Steps.



Business Plan

**Elizabeth A. Ford**

29 Del. C. Ch. 100 Freedom of Information

#### **SUMMARY OF PRIMARY SKILLS**

Business professional with over 30 years' experience working in a corporate business environment including pharmaceutical, finance, mortgage banking, education, and insurance.

#### **EXPERIENCE**

##### **Y-Prime Technologies, LLC, Malvern, PA, 2010 – Present**

###### **Associate Project Manager, January 2013 - Present**

- Responsible for supporting the Interactive Web Response (IWR) and Interactive Voice Response (IVR) pharmaceutical clinical trial software development projects and teams in their duties, functions, and responsibilities.
- Monitor adherence to the company's software development life cycle process.
- Ensure final systems are compliant with FDA's 21 CFR Part 11 policy for electronic records and signatures.
- Work with cross functional teams of technology development, and quality assurance to produce goal and target specifications and solve any conflicts that arise.
- Manage change control, and support planned/unplanned changes and developments in Validation, UAT, and Production environments.
- Develop and maintain system and project documentation.
  - Requests for proposal
  - Statements of work
  - System Requirements
  - Design Specifications
  - Data Transfer Specifications
  - Code Reviews
  - Install and Configuration Plans (Validation/UAT/Production environments)
  - Test Plans
  - Release Certificates
  - User Guides
  - Quick Reference Guides
  - Change Requests
  - System flow diagrams
  - System presentations
- Maintain an appropriate relationship with internal business partners to ensure that the project results are understood by the end users and business partners.

###### **Quality Assurance Associate, December 2010 – January 2013**

- Responsible for assessing and ensuring company compliance for all services and products offered.
- Provided assistance, support, and training to staff regarding GXP, SOP and other regulatory compliance issues, as well as conducting or assisting with internal audits for GXP, SOP and other regulatory compliance.
- Prepared regulatory audit reports and responses, and assisted in developing and completing corrective action plans as necessary.
- Conducted/assisted in external audits of contractors and vendors for the purpose of qualification and verification of regulatory compliance, including due diligence reviews, site audits.

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Business Plan

- Responsible for completing periodic re-evaluations, drafting, reviewing, approving and implementing Quality Assurance SOPs, as well as staying abreast of regulatory, quality, and industry trends.

**Business Management Analyst, JPMorgan Chase, Wilmington, DE, 2001 – 2009**

- Responsible for financial and technology planning within the Chase Card Services Core Processing Department.
- Resource management of 150+ offshore resources.
- Managed \$25M resource budget with 0 issues.
- Implemented internal Enterprise Change Management quality program which consisted of impact assessments, approvals, resource scheduling, and cross-team communication.
  - Program established a 99.8% success rate for Validation, UATV, and Production changes.
- **Awards Received:**
  - 2007 4<sup>th</sup> Quarter Chase Catalyst
  - 2007 "Best of the Best" – Overall Chase Champion.

**Director of Administration, Worthington, Moore & Jacobs, Dover, DE, 1998 - 2001**

- Responsible for overseeing administration department, payroll, commissions, benefits, accounts payable, and accounts receivable.
- Managed administration staff of 3 employees.
- Assisted CEO and President with budget forecasting.
- Responsible for preparation of monthly reports such Profit & Loss, production reports, new clients, and employee attendance.

**Senior Staff Assistant, Duke University Medical Alumni Affairs, Durham, NC 1995 – 1998**

- Responsible for coordination of meetings, preparation of alumni letters and event notifications.
- Assisted with special event projects (i.e. class reunions, education events, alumni social functions).
- Preparation of meeting materials (binders, reports, presentations).
- Attended board meetings, and prepared meeting minutes.
- Assisted with writing articles for monthly and quarterly alumni publications.
- Elected Secretary of *Ruth K. Broad Foundation*, 1997.

**Executive Assistant, Independent Insurance Agents of Delaware, Dover, DE 1993 – 1995**

- Responsible for compilation and publication of monthly member newsletters.
- Assisted with coordination of annual insurance conference.
- Organized monthly member dinner meetings and education seminars.
- Prepared annual membership reports and packages.

**SKILLS**

Software application experience includes:

- Adobe Acrobat
- Assembla
- Beeline
- Livelink
- MS Office Suite
- MS Project
- MS Visio
- Peregrine
- QuickBooks
- SharePoint
- Test Director
- Veeva Vault



**EDUCATION**

**Wilmington University, Wilmington, DE, 2008** - Bachelor of Science, Organizational Management  
(Cum Laude) GPA: 3.82

**Wilmington University's Organizational Management Program Overview**

- Business Communications
- Compensation Administration
- Computer Applications for Business
- Corporate Finance
- Critical Thinking
- Current Topics in Business Leadership
- Fundamentals of Economics
- Fundamentals of Finance for Managers
- Global Business
- Human Resource Management
- Introduction to Business
- Legal and Ethical Environment of Business
- Management Information Systems
- Marketing
- Operations and Systems Management
- Organizational Development
- Organizational Project
- Project Management

**Institute for Integrative Nutrition, New York City, NY, 2013** – Health Coach Certification will be obtained April 21, 2014

**ADDITIONAL TRAINING**

FDA 21 CFR Part 11 Training, Malvern, PA, 2012

Usui Reiki I Certification, 2011

Clear, Concise Presentations: Answers First (Bank One University), 2003

PODS Performance Management (Bank One University), 2003

SAP 4.6B Navigation (Bank One University), 2002

Communicating Effectively (Bank One University), 2002

Business Writing, (Duke University), 1997

Grammar and Writing Skills (Fred Pryor Seminar), 1997

Introduction to the Internet (Duke University), 1997

Microsoft PowerPoint (Duke University), 1996

Microsoft Excel Advanced (Duke University), 1996

Appendix B – Articles of Incorporation

PAGE 1		<b>State of Delaware</b> SECRETARY OF STATE DIVISION OF CORPORATIONS P.O. BOX 888 DOVER, DELAWARE 19903	140159825
9021484			02-17-2014
	GUIDED STEPS COMPASSION WELLNESS FOUNDATION 200 S. DUFONT BLVD. STE. 106 SMYRNA DE 19977		
	ATTN: FABIAN LIVINGSTON		

DESCRIPTION	AMOUNT
GUIDED STEPS COMPASSION AND WELLNESS FOUNDATION	
5479373 0102 Incorp Delaware Non-Stock	
Incorporation Fee	15.00
Receiving/Indexing	25.00
Certification Fee	50.00
Data Entry Fee	5.00
Court Municipality Fee, Dover	20.00
Surcharge Assessment-Rent County	6.00
Page Assessment-Rent County	27.00
FILING TOTAL	148.00
TOTAL PAYMENTS	148.00
SERVICE REQUEST BALANCE	.00

# Delaware

PAGE 1

*The First State*

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "GUIDED STEPS COMPASSION AND WELLNESS FOUNDATION", FILED IN THIS OFFICE ON THE TENTH DAY OF FEBRUARY, A.D. 2014, AT 12:10 O'CLOCK P.M.

A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE KENT COUNTY RECORDER OF DEEDS.

5479373 8100

140159825

You may verify this certificate online  
at [corp.delaware.gov/authver.shtml](http://corp.delaware.gov/authver.shtml)



  
Jeffrey W. Bullock, Secretary of State  
AUTHENTICATION: 1138686

DATE: 02-17-14

State of Delaware  
Secretary of State  
Division of Corporations  
Delivered 12:10 PM 02/10/2014  
FILED 12:10 PM 02/10/2014  
SRV 140158225 - 5479373 FILE

STATE of DELAWARE  
CERTIFICATE of INCORPORATION  
A NON-STOCK CORPORATION

- First: The name of the Corporation is Guided Steps Compassion and Wellness Foundation
- Second: Its Registered Office in the State of Delaware is to be located at

200 S. Dupont Blvd Suite 106 (street), in the City of Smyrna  
County of Kent Zip Code 19977. The name of the registered  
agents is: Fabian Livingston

- Third: The purpose of the corporation is to engage in any lawful act of activity for which corporations may be organized under the General Corporation Law of Delaware. (If the corporation is to be a nonprofit corporation, please add: "This Corporation shall be a nonprofit corporation.")

This Corporation shall be a nonprofit corporation. (Please see attached)  
Article A

- Fourth: The corporation shall not have any capital stock.
- Fifth: The conditions of membership are  
The conditions of the membership shall be stated in the by-laws.
- Sixth: The name and mailing address of the incorporators are as follows:

Name Fabian Livingston  
Mailing Address: 29 Del. C. Ch. 100 Freedom of Information Act

Name Ramane Jones  
Mailing Address: 29 Del. C. Ch. 100 Freedom of Information Act

- I, The Undersigned, for the purpose of forming a corporation under the laws of the State of Delaware, do make, file and record this Certificate, and do certify that the facts herein stated are true, and I have accordingly hereunto set my hand this 28 day of January AD 2014

BY: 29 Del. C. Ch. 100 Freedom of Information Act  
(Incorporator)

NAME: Fabian Livingston  
29 Del. C. Ch. 100 Freedom of Information Act

BY: 29 Del. C. Ch. 100 Freedom of Information Act  
(Incorporator)

NAME: Ramane Jones

(Article A)

**State of Delaware Certificate of Incorporation of Non-Stock Corporations Cont.**

Guided Steps Compassion and Wellness Foundation request to be tax-exempt under section 501(c)(3) of the Internal Revenue Code, our organization will be organized and operated exclusively for exempt purposes set forth in section 501(c)(3), and none of its earnings will inure to any private shareholder or individual. In addition, it will not be an action organization, i.e., it will not attempt to influence legislation as a substantial part of its activities and it will not participate in any campaign activity for or against political candidates.

Guided Steps Compassion and Wellness Foundation will not be organized or operated for the benefit of private interests, and no part of a section 501(c)(3) organization's net earnings may inure to the benefit of any private shareholder or individual.

1/26/2014



Business Plan

**Appendix C – By-Laws**

**PROPOSED BY-LAWS OF GUIDED STEPS COMPASSION CENTER LLC,  
A DELAWARE NON-PROFIT CORPORATION**

**ARTICLE I**

**NAME**

The name of the institution shall be **GUIDED STEPS COMPASSION CENTER LLC**, a Delaware non-profit corporation, hereinafter referred to as the "Corporation".

**ARTICLE II**

**MISSION:**

**Section 1**

Guided Steps Compassion Center, pursuant to Delaware Public Law Title 16, Chapter 49A, July 1, 2011 et seq. will cultivate and distribute medical cannabis to licensed patients within the guidelines of the law et seq. and provide educational, information, and support services to said patients, caregivers and supporters suffering from debilitating medical conditions where medical cannabis use will be a beneficial alternative to traditional therapies.

**Section 2**

To implement the above mission, the Corporation shall have the power to purchase, lease and otherwise acquire, maintain, control, operate, sell and otherwise alienate or dispose of any real or personal property for any use in connection with or in furtherance of the above-stated purpose(s) and to borrow money and from time to time make, accept, endorse and issue bonds, promissory notes, bills of exchange and other obligations for monies borrowed, and to secure the payment of any such obligation by mortgage, pledge, deed, indenture agreement or other instrument of trust or by other lien upon assignment of, or agreement in regard to, all or any part of the property rights or privileges of the Corporation wherever situated, and any other power consistent herewith or for any other lawful purpose.

**ARTICLE III MEMBERS**

**Section 1**

Guided Steps Compassion Center, shall operate under State of Delaware (the "DGCL") (8 Del. C. § 101, et seq.), as a Delaware Non-profit mutual benefit corporation having no members.

**ARTICLE IV BOARD OF DIRECTORS**

**Section 1**

**Number of Directors**

The Board of Directors shall initially consist of three (3) directors. However, the number of directors may change, but, at no time, shall the number consist of no more than five (5) nor less than three (3) Directors, as fixed from time to time by the Board of Directors.

**Section 2**

**Election and Term of Directors**

Except in the case of Directors serving ex officio or elected to fill a vacancy, each Director shall be elected at the Annual Directors' Meeting or a Special Meeting held in lieu therefore for a term of two (2) years, or until his or her successor is elected and qualified. Vacancies in existing terms may be filled by a majority vote of the Directors at any Directors Meeting. A Director may be removed from office with or without cause by a majority vote of the Directors at any meeting.

**Section 3**

**Duties of the Board of Directors**

The duties of the Board of Directors shall be to oversee the work and finances of the Corporation; to ensure that the work and the finances of the Corporation are conducted in accordance with the Articles of Incorporation of the Corporation and with these By-Laws; to appoint the Officers of the Corporation; to examine and approve the Treasurer's accounts; and to generally guide and direct the work of the Corporation in the fields of operating as a Compassion Center as presently defined under the State of Delaware (the "DGCL") (8 Del. C. § 101, et seq.)

**Section 4**

**Powers of Directors**

The Board of Directors shall have and exercise all the powers, rights, privileges and be subject to all the duties conferred or imposed upon the Incorporators and their associates and successors or upon the Corporation, by law, the Articles of Incorporation as may be amended from time to time, or by these By Laws.

**ARTICLE V**

**MEETINGS OF DIRECTORS**

**Section 1**

**Annual Meeting**

The Annual Meeting of the Board of Directors shall be held on the 1st Day of July at 12 Noon, at Guided Steps Compassion Center office, or at some other hour and place as shall be designated by the President and state in the notice of the Meeting. In the event of failure to hold said Annual Meeting at any time or for any cause, and all business which might have been transacted at such Annual Meeting may be transacted at the next succeeding Regular or Special Meeting.

**Section 2**

**Regular Meetings**

Regular Meetings of the Board of Directors shall be held on the 15th day each month, of each year, or at such other times as may be fixed by the Board of Directors.

**Section 3**

**Special Meetings**

Special Meetings of the Board of Directors may be called by any Officer at any time, and shall be called by the Secretary upon request of any two Directors.

**Section 4**

**Notice of Meetings**

The Secretary shall send a notice of each meeting to each Director, but if the Secretary shall be absent, declines, or is unable to act, any other Officers of the Corporation may send such notice. The Officer giving such notice shall give at least five (5) days' notice if by mail, or two (2) days' notice if by fax, telephone or electronic mail, of the time and place of such meeting, to be addressed to each Director at his or her address appearing on the records of the Corporation.

Notice of any meeting may be waived in writing by any Director, and will be waived by his or her attendance at such meeting, except when a Director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not lawfully called or convened and so indicates at that meeting, except as otherwise provided by this By-Laws, notice of an Annual or Regular Meeting need not specify the business to be transacted. Notice of a Special Meeting shall state the general nature of the business to be transacted.

**Section 5**

**Quorum**

Two-thirds (2/3rds) of the Directors of the Board of Directors shall constitute a quorum for the transaction of all business, but less than a quorum may adjourn a meeting from time to time.

**Section 6**

**Action at Meeting**

At any Meeting of Board of Directors at which a quorum is present, the vote of a majority of the Directors present, unless a different vote is specified by law, by the Articles of Incorporation, or by these By-Laws, shall be the act of the Board of Directors.

**Section 7**

**Action Without Meeting**

Any action required or permitted to be taken at a meeting of the Board of Directors may be taken without a meeting if consent in writing setting forth the action to be taken is signed by all of the Directors. Such consent shall have the same force and effect as a unanimous vote of the Board of Directors.

**ARTICLE VI**

**OFFICERS**

**Section 1**

**Enumeration – Term of Office and Manner of Election**

The Officers of the Corporation shall consist of a President, Treasurer and Secretary, all of whom shall be Directors of the Corporation, and such other officers including Vice Presidents, Assistant Treasurers, Assistant Secretaries, as the Board of Directors in its discretion may appoint from time to time.

The officers shall be elected annually by the Board of Directors at the Annual Meeting or a Special Meeting held in lieu thereof and shall hold office until the succeeding Annual Meeting and their successors are elected. Any vacancy may be filled by the Board of Directors at any meeting. Any two or more offices, except President and Secretary, may be held by the same person.

**President**

The President shall preside at all meetings of the Board of Directors.



Business Plan

**Vice-President**

The Vice-President shall act in the President's absence and shall chair all subcommittees established by the Board.

**Treasurer**

The Treasurer shall oversee custody of all funds and securities belonging to the Corporation, to endorse for collection on behalf of the Corporation all checks, notes and other obligations for the payment of money, and shall deposit all such monies, funds, checks, notes and other obligations to the credit of the corporation in such banks or trust companies as the Treasurer may from time to time select.

The Treasurer shall cause a regular set of books to be kept showing the accounts of the Corporation and all monies that may pass through the Treasurer's hands and shall, when requested by the Board of Directors, make a report to them at any Annual, Regular or Special Meeting with respect to any monies received by the Treasurer and such other matters pertaining to the accounts of the Corporation as the Board of Directors may require.

**Secretary**

The Secretary shall keep a record of the proceedings of all meetings of the Board of Directors, and shall give notice of all meetings of the Board of Directors.

**General Powers**

Each Officer shall have, subject to the Articles of Incorporation and these By-Laws, in addition to the powers and duties herein set forth, such powers and duties as are commonly incident to such office, and such duties and powers as the Board of Directors shall from time to time designate.

**Removal**

Any Officer may be removed by the Board of Directors whenever in its judgment; the best interest of the Corporation would be served thereby.

**ARTICLE VII**

**PROHIBITED ACTIVITIES**

**Section 1**

**No Commercial Endeavors.**

The name of the Corporation or the names of any directors, officers, or recipients of grants there from in such status, shall not be used in any connection with any commercial endeavor or with any partisan interest or for any purpose not appropriately related to the promotion of the objects of the Corporation .

**Section 2**

**Commitments on Behalf of the Corporation**

The Corporation may cooperate with other organizations, foundations and agencies concerned with the education of individuals or other groups about the alternative therapeutic effects of medical cannabis, cultivation and distribution of medical cannabis, whether licensed in Delaware, in another state within the United States of America or in another country or any other legal purpose of the Corporation, as it may be amended from time to time, so long as it does not interfere with the Corporation's primary purpose, but the persons representing the Corporation in such matters shall make no commitments that bind the Corporation without prior approval or and authorization by its Board of Directors.

**Section 3**

**Tax-Exempt Activities**

No director, employee, agent, representative, or recipient of any grant from the Corporation shall take any action or carry on an activity by, or on the behalf of, the Corporation not permitted to be taken or carried on by organizations exempt from Federal Income Tax under Section 501(c)(3) of the United States Internal Revenue Code and the regulations now existing or as they hereafter be amended, or which are



Business Plan

not permitted to be taken by an organization to which contributions are deductible pursuant to Section 170(c)(2) of said Code.

**Section 4**

**Earnings and Assets**

No director, officer, employee or person connected with the Corporation or any other individual shall at any time receive any of the income of the Corporation other than reasonable and bona fide expenses incurred on behalf of the Corporation, as approved by the Board of Directors.

**Section 5**

**Non-Discriminatory Policy**

The Corporation shall not in any respect discriminate in any manner by virtue of gender, race, creed, religious beliefs, sexual orientation, citizenship or place or country of origin.

**ARTICLE VIII**

**EXECUTION OF PAPERS**

**Section 1**

**Documents Requiring Corporate Seal**

Deeds and leases, promissory notes, mortgages, contracts and all instruments with a monetary value of more than Five Thousand Dollars (\$5,000.00) or that shall not be able to be completed within three (3) months, shall require the seal of the Corporation shall be executed by the President and Vice President of Finance and Operations.

**Section 2**

**Drafts and Checks**

Unless the Board of Directors otherwise directs, all negotiable drafts and checks shall require a signature from the President AND Vice President of Finance and Operations.

**ARTICLES IX**

**MISCELLANEOUS**

**Section 1**

**Corporate Seal**

The corporate seal shall be circular in form and shall bear the bears "Guided Steps Compassion Center, LLC" and "Incorporated Delaware 2013".

**Section 2**

**Fiscal year**

Except as from time to time otherwise determined by the Board of Directors, the fiscal year of the Corporation shall end on December 31.

**ARTICLE X**

**INDEMNIFICATION**

**Section 1**

Any director, officer, member or employee of the Corporation who is a party to any threatened, pending or completed action, suit or proceeding by virtue of his or her capacity as a director, officer, member or

employee of the Corporation, shall be indemnified for his or her expenses incurred in relation to such proceeding to the extent permitted under Delaware law, except that he or she shall not be entitled in any action in relation to which the director, officer, member or employee convicted of a crime, or in which his or her conduct is determined to constitute civil fraud against the Corporation, or in which he or she is adjudged to be liable on the basis that personal benefit was improperly received by him or her.

**ARTICLE XI**

**AMENDMENT**

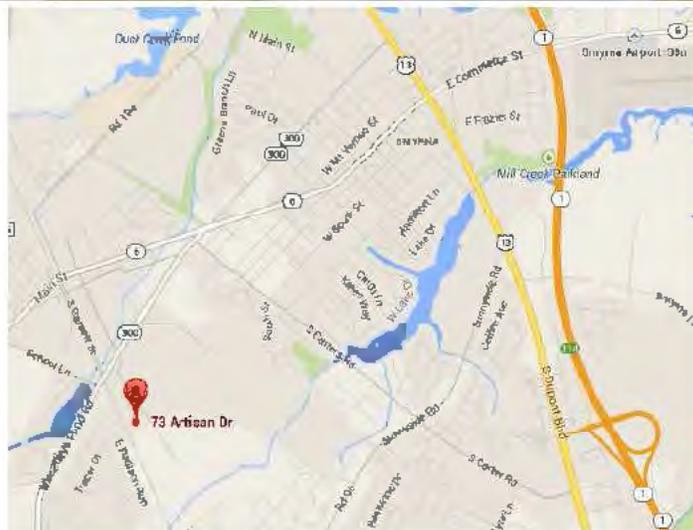
**Section 1**

These By-Laws may be amended or repealed at any Annual, Regular or Special Meeting of the Board of Directors at which a quorum is present by vote of a majority of the Directors present, provided the proposed changes or a written statement thereof shall have been given in the notice of the meeting. These By-Laws may also be amended by unanimous consent in writing of all of the directors.

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Appendix D – Location

73 Artisan Drive, Smyrna Business Park, Smyrna, DE 19977





Business Plan

**BCA DEVELOPMENT, LLC**  
**101 PEOPLES DRIVE**  
**NEWARK, DE. 19702**

**302-292-0200**

March 7, 2014

Mr. Fabian Livingston  
29 Del.C. Ch. 100 Freedom of Information Act

Re: 73 Artisan Drive  
Smyrna Industrial Park  
Smyrna, DE 19977

Dear Mr. Livingston,

It is our intent to enter into a lease with *Guided Steps Compassion Center* for the building at 73 Artisan Drive located in the Smyrna Industrial Park.

The lease will be for a period of two (2) years with the option of a three (3) year renewal. The space can be occupied with a 30 day notice.

If I can be of further assistance please let me know.

Sincerely,  
29 Del.C. Ch. 100 Freedom of Information Act

Brian Moriarty  
Partner  
VO Guided Steps (3/14/14) 13 07 3405