



**REQUEST FOR PROPOSAL NO. HSS 13 056**

**FOR**

**THE REGISTRATION AND OPERATION  
OF A MEDICAL MARIJUANA COMPASSION CENTER  
IN THE STATE OF DELAWARE**

---

**PRESENTED BY: GUIDED STEPS COMPASSION CENTER  
200 S. DUPONT BLVD.  
SMYRNA, DE 19977**

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

**FABIAN B. LIVINGSTON  
FOUNDER/PRESIDENT**

**BID DUE DATE: APRIL 08, 2014 AT 11:00am**

**CONFIDENTIAL**

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**IV. FORMAT AND CONTENT OF RESPONSE**

**F. Qualifications and Experience**

This section contains sufficient information to demonstrate Guided Steps Compassion Center's ("Guided Steps", the "Company" or "Center") legal status, knowledge, experience, and staff expertise to carry out the establishment and maintenance of Delaware's pilot compassion center.

Guided Steps will secure a Delaware Business License during the contract negotiation process.

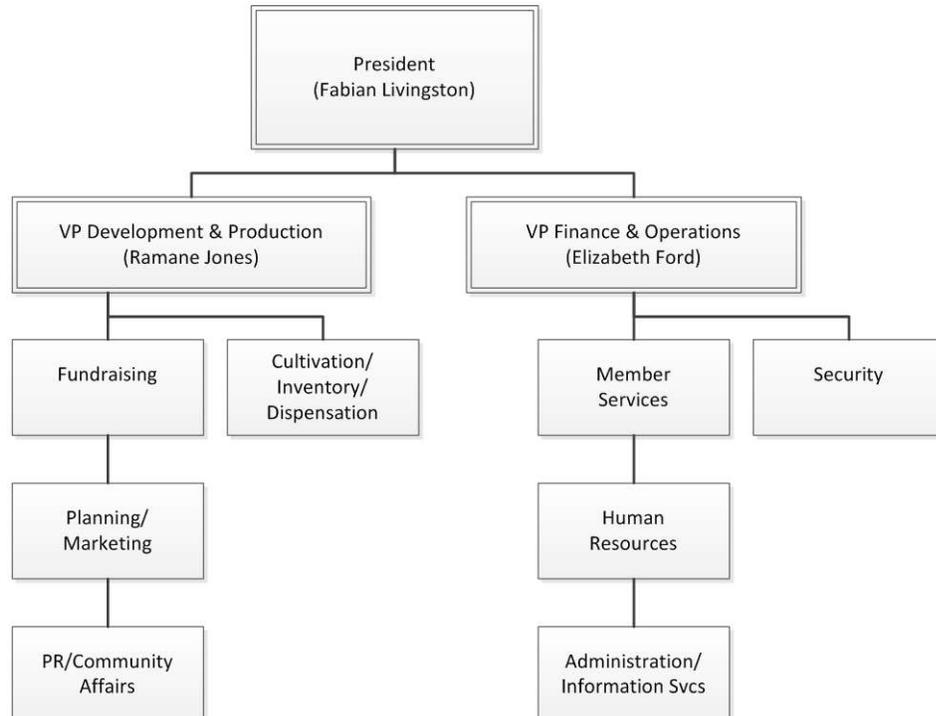
**1. Organizational Structure**

Describe the proposed team structure and internal controls to be used in the operation of the compassion center, including any subcontractors. Define how the company will establish lines of authority for personnel who might be involved in performance of this potential contract and relationships of this staff to other programs or functions within the company. This section should include at least the following information and documentation:

- a. Proposed legal name of the compassion center;
- b. Certificate and articles of incorporation (for corporations); certificate of partnership and partnership agreement (for partnerships); certificate of organization and operating agreement (for limited liability corporations);
- c. Evidence of the organization's not-for-profit status. This can be IRS certification of tax-exempt status, or other written materials allowing the Department to determine the compassion center's ability to comply with the not-for profit mandate. This should also include a description of how the compassion center will operate on a not-for-profit basis; and
- d. Proposed operating bylaws.

**Response F.1**

The proposed legal name of the compassion center is Guided Steps Compassion and Wellness Center, and will have the following organizational structure:



Please see **Appendices below for supporting documentation:**

- **Appendix A – Articles of Incorporation.**
- **Appendix B – Proposed Operating By-Laws**
- **Appendix C – Proposed Non-Profit LLC Operating Agreement**

**2. Agents of the Compassion Center and Organization**

The specific individuals, or agents, who will perform work on behalf of the compassion center, shall be identified by name and title along with explanation of the nature and extent of their involvement. This should include all board members, officers, owners, employees, volunteers, or other person involved with the ownership or operation of the compassion center. Provide qualification information on the named agent, including the individuals' particular skills related to the medical use of marijuana, education, experience, significant accomplishments and any other pertinent information. These qualifications shall be presented in resumes or other formats.

If set up and operation of the compassion center will require hiring of one or more individuals who are not currently employed by the bidding organization, the proposal application shall provide detailed job descriptions, including required qualifications and experience.

If subcontractors are to be used, the proposal shall also contain similar information regarding each subcontractor.

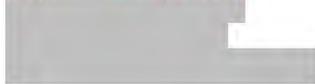
- a. For each proposed agent, provide the name, address and date of birth;**

**Response F.2.a**

The individuals who will perform work on behalf of Guided Steps Compassion Center are as follows (*please see Appendix E – Draft Operations Manual for detailed job descriptions*):

- i. President/Founder**  
**Fabian Livingston**

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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.

ii. **VP Development and Production/Board of Directors – Secretary**

Ramane Jones

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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.

iii. **VP Finance and Operations/Board of Directors – Treasurer**

Elizabeth Ford

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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 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.

iv. **Dispensary Manager**

Gia Livingston

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Mrs. Livingston brings to Guided Steps Compassion Center a vast knowledgebase in in medical office procedures and management, patient care and services, patient ethics, and medical cannabis training. Her experiences from working in the medical office environment have fueled her passion in educating patients on alternative wellness therapies and medical cannabis rather than pharmaceuticals. Mrs. Livingston's role as Dispensary Manager will include coordinating and facilitating the transactions of the dispensary, overseeing all medicine dispensed, ensuring accuracy in product packaging and labeling, supervising dispensary staff members, inventory management, as well as interfacing with executive management, staff, law enforcement, and vendors.

Once established, Guided Steps Compassion Center intends to hire individuals who are highly motivated, dedicated, honest, and hard-working business professionals 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.

Guided Steps Compassion Center intends to fill the following, but not limited to, positions:

- Master Grower
- Assistant Grower
- Bud Tenders
- Patient Intake Coordinator
- Receptionist
- Security Manager
- Security Guards
- Courier Drivers

*Please see Appendix E – Draft Operations Manual for detailed job descriptions.*

The affairs of Guided Steps Compassion Center will be overseen by a Board of Directors initially consisting of five (5) members, all of whom are residents of the State of Delaware. The Board of Directors is as follows:

i. **President**

Fabian Livingston

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ii. **Secretary**

Ramane Jones

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iii. **Treasurer**

Elizabeth Ford

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Guided Steps Compassion Center intends to have two (2) additional board members, and is currently in the process of interviewing well-known, successful business owners/managers who will enhance the compassion center's credibility and perception of management expertise. These additional board members will be in place before the Guided Steps Compassion Center facility is established.

**Please see Appendicies below for supporting documentation:**

- **Appendix D – Bios and Resumes**
- **Appendix E – Draft Operations Manual**

**b. For each proposed agent, provide the report of criminal history background check;**

**Response F.2.b**

Background check paperwork has been submitted for the following Guided Steps Compassion Center officers and employees:

- Fabian Livingston, President
- Ramane Jones, VP of Development and Production
- Elizabeth Ford, VP of Finance and Operations
- Gia Livingston, Dispensary Manager

The reports from the criminal history background check have not been received yet; however, please see **Appendix F – Criminal History Background Checks** for supporting documentation on requests submitted.

Criminal history background checks will be conducted and cleared for all potential board members, employees, volunteers, and contractors prior to joining the Guided Steps Compassion Center team.

**c. Any instances in which a business or not-for-profit that any of the prospective board members managed or served on the board was convicted, fined, censured, or had a registration or license suspended or revoked in any administrative or judicial proceeding;**

**Response F.2.c**

There are no board members of Guided Steps Compassion Center who have been convicted, fined, censured, or had a registration or license suspended or revoked in any administrative or judicial proceeding.

**d. A list of all persons or business entities having direct or indirect authority over the management or policies of the compassion center;**

**Response F.2.d**

As indicated in the Guided Steps Compassion Center By-Laws, the affairs of the Compassion Center will be overseen by its Board of Directors. As such, the management/governance structure and corporate policies of the Compassion Center will be established and/or adopted by the Board of Directors of Guided Steps Compassion Center, and will be implemented and directly overseen by the Principal Officers of Guided Steps Compassion Center. In particular, the President will act as the chief executive officer of Guided Steps Compassion Center and will preside at all meetings of the Board of Directors, and shall have general supervision and control of all officers, agents, employees, managers, volunteers, and independent contractors

of Guided Steps Compassion Center, and the management of its business interests. The other Principal Officers of Guided Steps Compassion Center (i.e. Treasurer, Secretary) will have the powers and perform the duties customarily appurtenant to their respective offices.

As such, the persons having direct or indirect authority over the management policies of Guided Steps Compassion Center in general shall be all of the Board Members and Principal Officers named in **Response 2.a**.

The daily performance of functions necessary to, and a part of, the above-mentioned management or policies adopted, implemented, and/or overseen by the Board of Directors and Principal Officers of Guided Steps Compassion Center, shall be performed by the following individuals:

- **President:** Fabian Livingston
- **VP of Development & Production:** Ramane Jones
- **VP of Finance and Operations:** Elizabeth Ford

**e. The identities of all creditors holding a security interest in the premises, if any.**

**Response F.2.e**

Guided Steps Compassion Center will lease from BCA Development, LLC the real property at which the Compassion Center is to be situated, namely 73 Artisan Drive, Smyrna, Delaware, 19977 ("Compassion Center Premises") in the Smyrna Business Park.

No creditors hold a security interest in the Compassion Center Premises.

**3. Ability, capacity, skills and expertise of the organization**

- a. Describe your organization's ability, capacity, skills and other expertise in product and industry knowledge, including but not limited to the following:
- How marijuana or agricultural products are grown, cultivated, harvested, cured, processed, packaged, labeled and prepared for retail sale;
  - Various types of marijuana strains and how they impact qualifying debilitating medical conditions, giving special attention to the conditions accepted by the Delaware Medical Marijuana Program;
  - Different forms in which to buy or sell marijuana (i.e. dried, concentrates, tinctures, etc.);
  - How marijuana should be packaged, labeled, transported, and sold at retail level;
  - How retail marijuana should be recalled and accounted for;
  - How marijuana should be destroyed if overproduced, contaminated, or recalled;
  - Any experience with the marijuana industry that shows the level of expertise of your company; and
  - Describe your company's ability, capacity, skills and expertise in product quality standards.

**Response F.3.a**

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Guided Steps Compassion Center intends to package final products in child-resistant containers and labeled as follows:



Guided Steps Compassion Center DD/MMM/YYYY  
73 Artisan Drive  
Smyrna, DE 19977  
(302)###-####

Disp. ID: #####

Producer:

Patient Name:

Reg. ID #:

<Name of Strain – Ex: Blue Dream>

0.00 GR Net MMJ Weight: 0.00 GR

Batch ID: #####

**Active Ingredients:**

CBD: %

THC: %

THCA: %

**Chemical additives:** No chemical additives

This product is for MEDICAL USE ONLY; NOT FOR RESALE

KEEP OUT OF REACH OF CHILDREN

Guided Steps Compassion Center intends to offer the following, but not limited, to medical marijuana strains:

**Hybrid Strains**

Blue Cheese  
Blue Chemdawg  
Blue Dream  
Bubba Kush  
California Dream  
Carmalicious  
CBD Kush  
CDB Critical Mass  
CBD Medical Haze  
Chemdawg  
Girl Scout Cookies  
La Blanca  
Larry OG Kush  
Light of Jah  
Medijuana  
Mega Jackpot  
OG's Kush  
Purple OG  
Sour Diesel  
Stacked Cush  
Strawberry Cough  
Strawberry Ice  
Super Nova  
Super Nova Haze  
Waikiki Queen  
White Queen  
White Widow

**Indica Strains**

Pakistan Chitral Kush  
Pakistan Valley  
Purple Kush

**Sativa Strains**

Jack Herer

***Please see Response I.1 Pages 26-31 for further information on medical cannabis strains and pricing.***

Guided Steps Compassion Center intends to use the grow strategy below for our initial batch. As each plant has a different harvest time, the grow cycle will be stringently managed via the MJ Freeway Grow Tracker program in order to ensure compliance with Sections 7.2.6.1 and 7.2.6.2 of the State of Delaware Medical Marijuana Code.

Indica	# Plants	Hybrid	# Plants
Pakistan Chitral Kush	4	Girl Scout Cookies	4
Pakistan Valley	6	La Blanca	5
Purple Kush	5	Larry OG Kush	4
<b>Sativa</b>		Light of Jah	4
Jack Herer	5	Medjuana	5
<b>Hybrid</b>		Mega Jackpot	4
Blue Cheese	4	OG's Kush	4
Blue Chemdawg	4	Purple OG	4
Blue Dream	4	Sour Diesel	5
Bubba Kush	4	Stacked Kush	4
Bubba's Trainwreck Haze	4	Strawberry Cough	4
California Dream	4	Strawberry Ice	4
Carmalicious	4	Super Nova	5
CBD Kush	6	Super Silver Haze	4
CDB Critical Mass	6	Waikiki Queen	5
CBD Medical Haze	6	White Queen	4
Chemdawg	4	White Widow	5
Charlotte's Web	6	<b>TOTAL PLANTS</b>	<b>150</b>

**High CBD Strain**

Medical marijuana strains will be added based on patient/caregiver requests and/or feedback, and as research results are published.

Guided Steps Compassion Center intends to offer medical marijuana to patients and caregivers in the following, but not limited to, additional forms (*please see **Response I.1 Page 31 for specialty product pricing***):

- Pure Medical Cannabis Balm
- Bath Salts
- Hemp Soap
- Cannabis Lotion
- Cannabis CBD Salve
- CBD Oil
- Cannabis Tinctures

Guided Steps Compassion Center intends to offer Compassionate Courier Service for patients who are unable to make it to the facility to pick up their medication.

***Please see Appendix G – SOP 110: Compassionate Courier Service.***

**Until an adequate flow of inventory has been established and maintained in order to meet supply and demand, as well as remain compliant with Sections 7.2.6.1 and 7.2.6.2 of the Delaware Medical Marijuana Code, patient and caregiver visits to Guided Steps Compassion Center will be by appointment only.**

Guided Steps Compassion Center intends to offer a 3 day no questions asked return policy. If for ANY reason a patient or caregiver is dissatisfied with a product(s) processed by Guided Steps for whatever reason, the product(s) may be exchanged or returned for a full refund.

Contaminated, recalled, or over-produced medical marijuana will be managed as per Guided Steps Compassion Center's procedure outlined in SOP 108: Growing, Cultivating & Disposal. For disposal of unusable medical cannabis, Guided Steps Compassion Center intends to utilize the Bokashi Yard Waste Fermenting System.

**Please see Appendix H – SOP 108: Growing, Cultivating & Disposal**



Guided Steps Compassion Center currently does not have any prior experience in the medical marijuana industry.

Guided Steps Compassion Center will take every measure of precaution to maintain quality control of the medicine. Following are the cultivation practices we intend to use:

Guided Steps Compassion Center intends to employ a Closed Growing Environment (CGE) method, used by the best commercial cultivators, which creates an indoor microclimate ideal for plant growth while also enhancing grower security.

Ballasts, electrical items, and other equipment are in rooms that do not contain plants. This keeps unwanted heat and equipment out of plant rooms, decreases electrical dangers, and makes maintenance easier. We will place air conditioning units, ballasts, and other electrical equipment in rooms specially designed to control electrical hazards, while placing nutrient reservoirs, propane tanks and related equipment in other segregated, non-plant rooms. CGE eliminates problems that are caused by allowing outside air in, specifically insects, fungi, spores, molds, and even hemp pollen into a grow room. Guided Steps Compassion Center will install venting systems outfitted with activated coconut carbon charcoal filters located at the top of the room that will eliminate odors and pathogens.

C02 augmentation is necessary in a CGE environment because air is recirculated, instead of having fresh C02-rich air brought in from outdoors and it speeds plant growth. However, when C02 is used in rooms that are not properly sealed, the gas can cause health hazards, and is partially wasted when it escapes the grow room instead of being totally absorbed by plants. The C02 generators will be outside of the grow rooms and use fans to send C02 from the generators into rooms via duct systems using C02 sequencers and controllers that measure air density and then turn the C02 devices on and off to maintain a 1,500 ppm C02 level in the rooms. C02-rich air will be pushed in with intake fans, with exhaust fans on the other end of the room pulling the C02 through the plants.

Sensors will be used to monitor air temperature to keep it an ideal growing environment; 73-780F, 40-55% humidity, 1,500 ppm C02, with constant air flow throughout. 29 Del.C. Ch. 100 Freedom of Informat

During initial build-out, we will wait until insulation, venting, and electrical work is complete before [REDACTED] 29 Del.C. Ch. 100 Freedom of Information Act [REDACTED]

Guided Steps will use [REDACTED] 29 Del.C. Ch. 100 Freedom of Information Act [REDACTED]

Guided Steps will use [REDACTED] 29 Del.C. Ch. 100 Freedom of Information Act [REDACTED]

Plants will be inspected daily with a magnifying glass and we will use microscopes and pathogen test kits to examine clones, clone mothers, grow medium, nutrient water, and the general grow environment, ever alert to even the most minor indicators of disease or pests.

Plants infected with pests will be removed immediately and placed in a Quarantine Room. A Yellow Warning Report will be generated and provided to the Cultivation Manager. The cultivation team will remediate the plants with natural predators, not with pesticides, before returning the plant(s) to cultivation. All plants will be left in an isolated treatment room until completely cured of pest and or disease, or they will be disposed of as per the process defined in SOP 108: Growing, Cultivating & Disposal.

Guided Steps Compassion Center will investigate the use of "passive" systems that cool the air by running water through a coil that air is blown over, as they are less expensive to use. We will employ one 16-inch oscillating fan for every four lights, which increases air circulation. Air blowing on plants causes thicker stalk development, better nutrient circulation, healthier plants, and increased yield.

Once the grow, cultivation, and harvesting process are defined, Guided Steps Compassion Center will create a Quality Control Standard Operating Procedure (SOP) outlining the policies and procedures, which staff will be trained to follow and adhere to.

***Please see Appendix J – SOP 110: Medical Cannabis Quality Assurance Testing.***

- b. Describe your company's ability, capacity, skills and/or expertise in product quality standards and testing, including but not limited to the following:
- Knowledge of the infrastructure required to test marijuana to ensure product quality, content, ingredients and consumer safety considerations;
  - Assisting DPH with establishing quality standards for testing marijuana; and
  - Provide a complete description of your company's proposed approach and methodology to be used in assisting the State of Delaware to develop a reputable protocol for Product Quality Standards and Testing as requested to determine TCH/CBD levels and/or ratios, mold or chemical contaminants, and Product strain.

**Response F.3.b**

Guided Steps Compassion Center intends to utilize Steep Hill Halent Laboratories for medical cannabis testing and analysis.

Guided Steps Compassion intends to lease a QuantaCann machine where samples collected in-house will be placed; however, the results will be generated from Steep Hill Halent's in-house servers.

The methodology to be followed will be:

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5. Results will be recorded and included in the labeling of medical cannabis.

Guided Steps Compassion Center intends to utilize Steep Hill Halent Laboratories for the following but not limited to services:

- Cannabinoid and Terpenoid Profiling
- Microbiological Screening (*Bacteria, mildew, fungus*)
- Pesticide Screening
- Residual Solvent Screening

***Please see Appendix I for further information regarding Steep Hill Halent Laboratories.***

After the QuantaCann is installed and staff is trained on the machine, Guided Steps Compassion Center will create a Testing Standard Operating Procedure (SOP) to outline the testing process to be followed and adhered to.

***Please see Appendix J – SOP 110: Medical Cannabis Quality Assurance Testing.***

**G. Location and Security of Compassion Center**

This section should describe the details of the proposed location and facility of the compassion center, including all proposed security measures.

**1. Location**

Include the following information regarding the proposed location for the compassion center and any other proposed location, if any, where marijuana will be securely cultivated, harvested, packaged, labeled, or otherwise prepared for distribution by the compassion center:

- a. If precise addresses are known
- The proposed physical address or addresses;

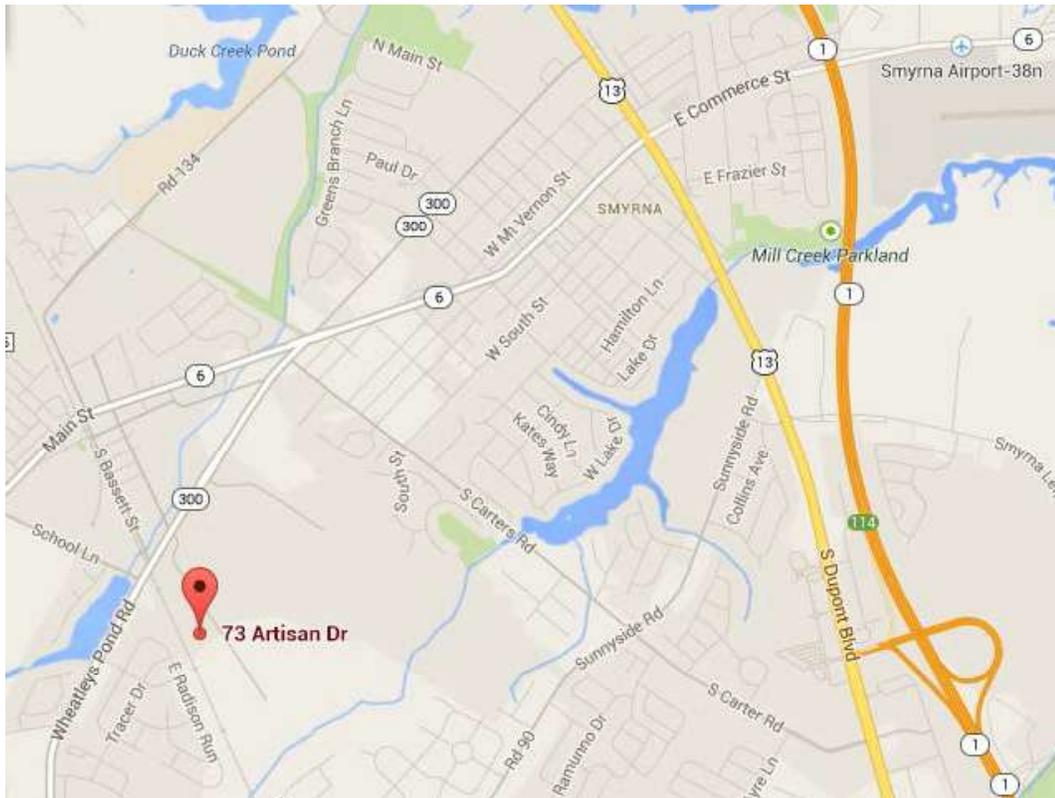
**Response G.1.a**

The proposed physical address of Guided Steps Compassion Center where medical marijuana will be securely cultivated, harvested, packaged, labeled, or otherwise prepared for distribution is as follows:

**73 Artisan Drive  
Smyrna Business Park  
Smyrna, DE 19977**



Free parking is provided, with the number of parking spaces being more than sufficient for the expected demand; handicapped accessibility is ample including without limitation entrance ramps and bathroom facilities.



Directions to Guided Steps Compassion Center are as follows:

**From the North**

- 95 South toward Newark/Baltimore
- Take the DE-7 S exit, EXIT 4A, toward DE-1 S/Christiana/Mall Road
- Merge onto DE-1 S via the ramp on the left
- Merge onto DE-1 S toward US-13 S/Dover/BEACHES (Portions toll)
- Merge onto US-13 S via EXIT 119A toward DE-6/DE-300/Smyrna
- Turn right onto E Glenwood Ave/DE-6/DE-300.
- Continue to follow DE-300
- Turn left onto Artisan Drive (SMYRNA BUSINESS PARK)
- 73 ARTISAN DRIVE is on the right

**From the South**

- US-113 North to DE-1 North
- Take the US-13 exit, EXIT 114, toward DE-300/S Smyrna/DE-6
- Merge onto S DuPont Blvd/US-13 N toward DE-300 W/Smyrna/SMYRNA BUSINESS PARK
- Turn left onto E Glenwood Ave/DE-6/DE-300.
- Continue to follow DE-300
- Turn left onto Artisan Drive (SMYRNA BUSINESS PARK)
- 73 ARTISAN DRIVE is on the right

b. Evidence of compliance with local zoning laws for each physical address;

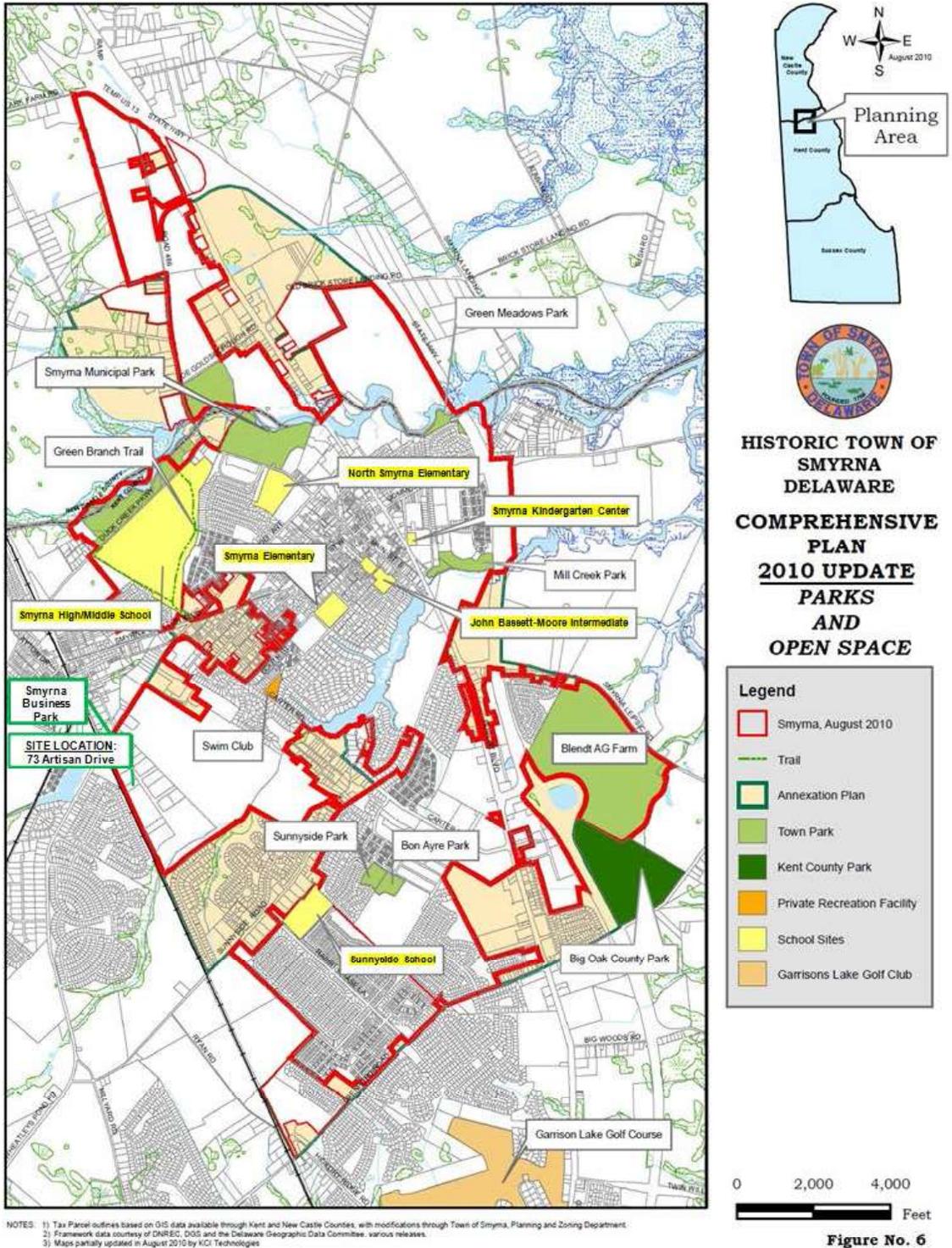
**Response G.1.b**

The Town of Smyrna zoning ordinance is in the process of being revised. ***Please see letter from Town of Smyrna in Appendix L.***

- c. Evidence of compliance that the sites are not located within 1,000 feet of a property line of a preexisting public or private school; and

**Response G.1.c**

Guided Steps Compassion Center is not within 1,000 feet of a pre-existing public or private school in Town of Smyrna.



- d. Legally binding evidence of site control (e.g., deed, lease, option, etc.) sufficient to enable the applicant to have use and possession of the subject property for the intended purpose.

**Response G.1.d**

Guided Steps Compassion Center will lease the property located at 73 Artisan Drive, Smyrna, Delaware, 19977 in Smyrna Business Park for a period of 2 years, with the option of a 3-year renewal. This property is currently leased to another business, which is seeking to terminate their lease early. Upon being awarded the bid for RFP No. HSS 13 056, Guided Steps Compassion Center will be able to occupy the space with a 30-day notice.

***Please see Appendix M – Letter of Intent from BCA Development, LLC.***

- e. If precise address(es) have not been determined

**Response G.1.e**

The general location of Guided Steps Compassion Center has been determined as 73 Artisan Drive, Smyrna, Delaware, 19977, in the Smyrna Business Park.

- f. identify the general location where it would be sited;

**Response G.1.f**

The general location of Guided Steps Compassion Center has been determined as 73 Artisan Drive, Smyrna, Delaware, 19977, in the Smyrna Business Park.

- g. any relevant information known about how site control will be obtained (e.g. purchased, leased, etc.); and

**Response G.1.g**

Guided Steps Compassion Center facility at 73 Artisan Drive, Smyrna, Delaware in the Smyrna Business Park will be on leased for a 2-year period, with the option of a 3-year renewal.

***Please see Appendix M for Letter of Intent from BCA Development, LLC.***

- h. When the precise location would be established.

**Response G.1.h**

Upon being awarded the bid for RFP No. HSS 13 056, Guided Steps Compassion Center would be established at 73 Artisan Drive, Smyrna, Delaware, 19977 in the Smyrna Business Park in 30 days of notification (*Approximate date to occupy the site: June 1, 2014*). .

**2. Facility description and proposed security**

- a. Provide a description of enclosed locked facility that would be used in the cultivation of marijuana, including steps to ensure that the marijuana production, packaging, labeling, or distribution shall not be visible from the street or other public area.

**Response G.2.a**

Guided Steps Compassion Center will contract with Assurance Media to implement the security plan as described below.

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

The security and safety level of Guided Steps Compassion Center is significantly and uniquely enhanced by the manner in which the Building is bounded and lit externally. The Building sits in the middle of the Smyrna Business Park, with virtually no pedestrian traffic. The nearest road (Route 300) is 500 linear feet from the building.

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





*Please see Appendicies below for further details pertaining to Guided Steps Compassion Center's safety and security procedures:*

- *Appendix N – Guided Steps Compassion Center Floor Plan*
- *Appendix O – Assurance Media Confidential Security Plan*
- *Appendix K – SOP 102: Safety and Security*

#### **H. Bidder References**

The names and phone numbers of at least three (3) organizations/agencies for whom the vendor carried out a similar project must be included. If no similar project has been conducted, others requiring comparable skills can be used.

Bidder shall list all contracts awarded to it or its predecessor firm(s) by the State of Delaware; during the last three years, by State Department, Division, Contact Person (with address/phone number), period of performance and amount. The Evaluation/Selection Review Committee will consider these additional references and may contact each of these sources. Information regarding bidder performance gathered from these sources may be included in the Committee's deliberations and factored in the final scoring of the bid. Failure to list any contract as required by this paragraph may be grounds for immediate rejection of the bid.

#### **Response H**

Guided Steps Compassion Center has not carried out any projects similar to the Delaware Medical Marijuana Program.

#### **I. Proposed Methodology and Work Plan**

This section shall describe in detail the approach that will be taken to carry out the activities described in the Scope of Services section of this RFP. Specific completion dates for various tasks must be shown. The work plan shall outline specific objectives, activities and strategies, and resources.



**Response I**

Guided Steps Compassion Center intends to utilize a project plan methodology in order to track specific objectives, activities, milestones, and resources. Please see tentative timeline below:

Guided Steps Compassion Center Project Plan						
Project Milestones	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
RFP Advertisement	26-Dec-13	26-Dec-13	DHSS	C	100%	DHSS=Delaware Health & Social Services
Mandatory Pre-Bid Meeting	31-Jan-14	31-Jan-14	DHSS	C	100%	
GSCC Secure Project Funding	3-Mar-14	18-Mar-14	GSCC	C	100%	GSCC=Guided Steps Compassion Center
GSCC Obtain Funding Commitment Letter	18-Mar-14	18-Mar-14	GSCC	C	100%	
Bid Opening (Submit RFP to DHSS)	21-Mar-14	8-Apr-14	GSCC	C	100%	
Vendor Review Process	21-Mar-14	30-Apr-14	DHSS	IP		
Vendor Selection (Tentative)	30-Apr-14	30-Apr-14	DHSS	NS		
GSCC Sign Lease	1-May-14	1-May-14	GSCC	NS		
Facility Build-Out/Construction	1-May-14	30-Jun-14	BCA	NS		
Project Begins	30-Jun-14	30-Jun-14	DHSS/GSCC	NS		
Certificate Issued	1-Jul-14	1-Jul-14	DHSS	NS		
GSCC Occupy Premises	1-Jul-14	1-Jul-14	GSCC	NS		
Set-Up Security System	15-Jun-14	30-Jun-14	GSCC/AM	NS		AM=Assurance Media
Set-Up Grow and Cultivation Rooms	15-Jun-14	30-Jun-14	GC Staff	NS		GC=Grow/Cultivation Staff
First Planting/Harvest/Curing	1-Jul-14	30-Sep-14	GC Staff	NS		
Set-Up Dispensary	15-Jul-14	15-Aug-14	Disp Staff	NS		Disp Staff=Dispensary Staff
Set-Up Offices and Reception Area	7-Jul-14	15-Aug-14	Oper/Admin staff	NS		
Preparation for Official Opening	1-Jul-14	1-Oct-14	GSCC	NS		
Package Finished Products	29-Sep-14	30-Sep-14	GC Staff	NS		
GSCC Grand Opening	1-Oct-14	1-Oct-14	GSCC-All	NS		

Facility	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
Identify Location	1-Feb-14	28-Feb-14	GSCC	C	100%	
Obtain Letter of Intent	3-Mar-14	7-Mar-14	GSCC/BCA	C	100%	BCA=BCA Development (Builder)
Sign Lease	1-May-14	1-May-14	GSCC	NS		
Facility Build-Out/Construction	1-May-14	30-Jun-14	BCA	NS		
GSCC Occupy Premises	1-Jul-14	1-Jul-14	GSCC	NS		
Preparation for Official Opening	1-Jul-14	1-Oct-14	GSCC	NS		
Conduct Mock DR/Safety/Security Scenarios	15-Sep-14	30-Sep-14	GSCC/Security	NS		
GSCC Grand Opening	1-Oct-14	1-Oct-14	GSCC	NS		

Security	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
Set-Up Security System	15-Jun-14	30-Jun-14	AM	NS		AM=Assurance Media
Update Safety and Security SOP	23-Jun-14	27-Jun-14	Security Mgr	NS		
Conduct Safety and Security Staff Training	30 Jun 14	30 Jun 14	GSCC/AM	NS		
Implement Security Procedures	1-Jul-14	Ongoing	Security Staff	NS		

Growing/Cultivation	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
Order Seeds	1-Jun-14	1-Jun-14	GC Mgr	NS		GC=Grow/Cultivation Staff
Order Growing/Cultivation Equipment	1-Jun-14	1-Jun-14	GC	NS		
Set-Up Grow and Cultivation Rooms	15-Jun-14	30-Jun-14	GC Staff	NS		
Order MJ Freeway System	30-Jun-14	30-Jun-14	Oper Mgr	NS		
Order Bakashi Disposal System	30-Jun-14	30-Jun-14	Oper Mgr	NS		
Order QuantaCann Testing Machine System	30-Jun-14	30-Jun-14	Oper Mgr	NS		
First Planting/Harvest/Curing	1-Jul-14	30-Sep-14	GC Staff	NS		
Document Quality Control procedure	1-Jul-14	30-Sep-14	GC Mgr	NS		For SOP 110: Quality Control
Set-Up Inventory Barcoding System	1-Aug-14	8-Aug-14	GC Mgr	NS		
Packaging/Labeling Preparation	3-Sep-14	5-Sep-14	GC Staff	NS		
Develop Monitoring Procedures	1-Jul-14	30-Sep-14	GC Mgr	NS		Update applicable SOPs and Operations Manual
Develop Safety and Compliance Activities	1-Jul-14	15-Sep-14	GC Mgr	NS		
Implement Barcoding Inventory System	11-Aug-14	15-Aug-14	GC Mgr	NS		
Staff Training on Inventory System	18-Aug-14	20-Aug-14	GC Mgr	NS		
Conduct Mock DR/Safety/Security Scenarios	15-Sep-14	30-Sep-14	GC Mgr/Security	NS		
Obtain Testing Samples	22-Sep-14	24-Sep-14	GC Staff	NS		
Test Samples (QuantaCann)	24-Sep-14	24-Sep-14	GC Mgr	NS		
Update System with Test Results	24-Sep-14	24-Sep-14	GC Mgr	NS		
Develop Testing Procedures While Testing	22-Sep-14	24-Sep-14	GC Mgr	NS		For SOP 111: Medical Cannabis Testing
Update SOP 111: Medical Cannabis Testing	24-Sep-14	26-Sep-14	GC Mgr	NS		
Implement/Train Staff on Testing Procedures	29-Sep-14	30-Sep-14	GC Mgr	NS		
Package Final Products	29-Sep-14	30-Sep-14	GC Staff	NS		
Log Finished Products into Inventory System	29-Sep-14	30-Sep-14	GC Mgr	NS		
Store Finished Products in Vault Until Needed	29-Sep-14	30-Sep-14	GC Mgr	NS		
Update SOP 110: Quality Control	30-Sep-14	3-Oct-14	GC Mgr	NS		
Conduct Staff Training on Quality Control	1-Oct-14	3-Oct-14	GC Mgr	NS		
Prepare for Next Planting Cycle	3-Oct-14	3-Oct-14	GC Staff	NS		
Next Plant Lifecycle	3-Oct-14	31-Dec-14	GC Staff	NS		



Dispensary	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
Order Paraphernalia/Accessories/Retail Items	7-Jul-14	7-Jul-14	Disp Mgr	NS		
Oder GSCC Library Materials	7-Jul-14	7-Jul-14	Disp Mgr	NS		Medical cannabis educational material, books, etc.
Set-Up Dispensary	15-Jul-14	15-Aug-14	Disp Staff	NS		
Set-Up Library	15-Jul-14	1-Aug-14	Disp Staff	NS		
Set-Up POS System	15-Jul-14	18-Jul-14	Disp Mgr	NS		
Prepare GSCC Product Menu and Pricing	21-Jul-14	25-Jul-14	Disp Staff	NS		
Refine GSCC Discounts	21-Jul-14	25-Jul-14	Disp Mgr	NS		
Enter Product Menu and Pricing in POS	28-Jul-14	1-Aug-14	Disp Mgr	NS		
Enter Discounts in POS	28-Jul-14	1-Aug-14	Disp Mgr	NS		
Staff Training on POS System	4-Aug-14	8-Aug-14	Disp Mgr	NS		
Staff Training on Patient Management System	11-Aug-14	15-Aug-14	Disp Mgr	NS		
Staff Training on Dispensary Procedures	18-Aug-14	22-Aug-14	Disp Mgr	NS		Update Operations Manual as needed
Refine Compassionate Courier Service	25-Aug-14	29-Aug-14	Disp Mgr	NS		Update SOP 112: Compassionate Courier Service
Implement Compassionate Courier Service	2-Sep-14	5-Sep-14	Disp Mgr	NS		
Staff Training on Compassionate Courier Svc	8-Sep-14	10-Jan-00	Disp Mgr	NS		
Conduct Mock Security Scenarios	10-Sep-14	12-Sep-14	Disp Mgr/Security	NS		
Set-Up Displays	15-Sep-14	19-Sep-14	Disp Staff	NS		
Prepare Patient/Caregiver Materials	22-Sep-14	24-Sep-14	Disp Staff	NS		
Prepare Dispensary for Grand Opening	25-Sep-14	1-Oct-14	Disp Staff	NS		

Operations	Start Date	End Date	Task Owner(s)	Status	% Complete	Notes/Comments
Establish Financial Requirements	1-Feb-14	7-Mar-14	Oper Mgr	C	100%	
Define Organizational Structure	1-Feb-14	15-Feb-14	Oper Mgr	C	100%	
Submit Background Check Paperwork	15-Feb-14	28-Mar-14	GSCC-All	C	100%	
File Articles of Incorporation	10-Feb-14	10-Feb-14	Oper Mgr	C	100%	
Draft Proposed By-Laws	10-Feb-14	12-Feb-14	Oper Mgr	C	100%	
Create Draft Operations Manual	16-Feb-14	7-Mar-14	Oper Mgr	C	100%	
Application Process for 501c3 Status	15-Mar-14	30-Apr-14	Oper Mgr	IP	25%	
Implement Official By-Laws	15-Jun-14	30-Jun-14	Oper Mgr	NS		
Finalize GSCC Operating Agreement	15-Jun-14	30-Jun-14	GSCC Exec Mgmt	NS		
Establish Extra Security Measures	15-Jun-14	30-Jun-14	Oper Mgr/Security	NS		Town of Smyrna Police Dept; After-hours security
Apply for Registry Identification Cards (Staff)	1-Jun-14	30-Jun-14	Oper Mgr	NS		
Implement Extra Security Measures	1-Jul-14	1-Jul-14	Oper Mgr/Security	NS		
Purchase Office Equipment/Furniture/Décor	1-Jul-14	7-Jul-14	Oper Mgr	NS		
Set-Up Network Administration System	1-Jul-14	15-Jul-14	Oper Mgr	NS		
Set-Up Phone System	1-Jul-14	9-Jul-14	Oper Mgr	NS		
Set-Up Accounting System	1-Jul-14	15-Jul-14	Oper Mgr	NS		
Order Office Supplies	7-Jul-14	8-Jul-14	Admin staff	NS		
Coordinate/Sched Board of Directors Meetings	7-Jul-14	11-Jul-14	Oper Mgr	NS		Monthly meetings
Set-Up Offices and Reception Area	7-Jul-14	15-Aug-14	Admin staff	NS		
Establish Record Retention Service	15-Jul-14	15-Jul-14	Oper Mgr	NS		Iron Hill
Set-Up Patient Verification System	15-Jul-14	31-Jul-14	Oper Mgr	NS		MJ Freeway
Set-Up HR Processes	15-Jul-14	31-Jul-14	Oper Mgr	NS		
Hiring Process	1-Aug-14	15-Aug-14	Oper Mgr	NS		
Meet & Greet with Board Members	1-Aug-14	1-Aug-14	GSCC-All	NS		First Board of Directors Meeting
Revise Operations Manual and SOPs	1-Aug-14	30-Sep-14	Oper Mgr	NS		
Begin Coordinating Main Fundraising Event	4-Aug-14	31-Dec-14	Oper Mgr/FRC	NS		FRC=Fundraising Comm. (1st Annual Bud Ball)
Determine Staff Training Needed	18-Aug-14	22-Aug-14	Oper Mgr	NS		
Finalize Operations Manual	25-Aug-14	29-Aug-14	Oper Mgr	NS		
Conduct Staff Training	2-Sep-14	12-Sep-14	Oper Mgr	NS		Operations Manual, SOPs, etc.
Begin Coordination of Outreach Programs	2-Sep-14	30-Sep-14	Oper Mgr	NS		
Board of Directors Meeting	8-Sep-14	8-Sep-14	GSCC Exec Mgmt	NS		
Conduct Mock Security Scenarios	15-Sep-14	19-Sep-14	Oper Mgr/Security	NS		
Prepare Welcome Packets	22-Sep-14	24-Sep-14	Admin staff	NS		
Prepare Front Office for Grand Opening	25-Sep-14	30-Sep-14	Admin staff	NS		
GSCC Grand Opening	1-Oct-14	1-Oct-14	GSCC-All	NS		

**1. Products and Services Provided**

This section shall contain a list of proposed products and services that will be offered by the compassion center to registered and impaneled patients should the proposal be selected and awarded the registration certificate.

This should contain details of the varieties of marijuana that will be offered and the quantities of each. It should also contain details of paraphernalia used to administer the drug that will be available to patients.

**Response I.1**

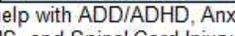
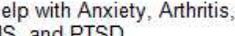
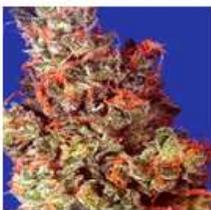
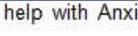
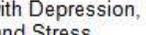
Guided Steps Compassion Center intends to offer the following, but not limited to, products to patients and caregivers:

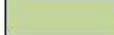
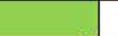
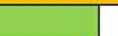
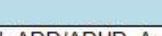
- Medical Cannabis Dried Flowers
- Pure Medical Cannabis Balm
- Bath Salts
- Hemp Soap
- Cannabis Lotion
- Cannabis CBD Salve
- CBD Oil (10ml)
- Cannabis Tinctures
- Pre-Rolled Medical Cannabis Joints
- Smoking Pipes
- Vaporizers
- Grinders
- Wrapping Papers/Blunts
- Lighters
- Storage Bags
- Storage Boxes
- Cleaning Products

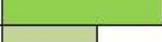
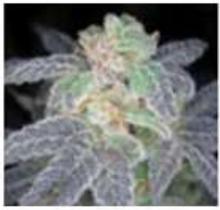
Product information and pricing is as follows:

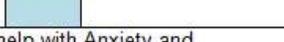
**Medical Cannabis Strains**

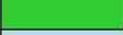
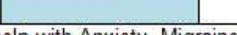
Hybrid Strains		Treatment		Donation	
<b>Blue Cheese</b>  CBD: 1.3% Avg. THC: 20% Avg.		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Nausea		1/8 oz	60.00
		Pain		1/4 oz	100.00
		Stress		1/2 oz	175.00
		Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and Bipolar Disorder.			1 oz
<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

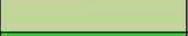
<b>Bubba Kush</b>  CBD: TBD THC: TBD		<b>Depression</b> 	Gram	20.00		
		<b>Insomnia</b> 	1/16 oz	40.00		
		<b>Nausea</b> 	1/8 oz	60.00		
		<b>Pain</b> 	¼ oz	100.00		
		<b>Stress</b> 	½ oz	175.00		
		Also used to help with ADD/ADHD, Anxiety, Migraines, PMS, and Spinal Cord Injury.			1 oz	350.00
<b>California Dream</b>  THC: Up to 24%		<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> 	¼ oz	100.00		
		<b>Stress</b> 	½ oz	175.00		
		Also used to help with Anxiety, Arthritis, Migraines, PMS, and PTSD.			1 oz	350.00
<b>Caramelicious</b>  THC: Up to 21%		<b>Depression</b> 	Gram	15.00		
		<b>Insomnia</b> 	1/16 oz	35.00		
		<b>Nausea</b> 	1/8 oz	50.00		
		<b>Pain</b> 	¼ oz	75.00		
		<b>Stress</b> 	½ oz	150.00		
		Also used to help with Anxiety, Migraines, and PMS.			1 oz	300.00
<b>*CBD Kush</b>  *CBD-Rich Strain: CBD: 7% Avg. THC: 7% Avg.		<b>Anxiety</b> 	Gram	10.00		
		<b>Migraines</b> 	1/16 oz	20.00		
		<b>PMS</b> 	1/8 oz	30.00		
		Also used to help with Depression, Muscle Spasms, Nausea, Stress, Arthritis, ADD/ADHD, and Bipolar Disorder.			¼ oz	65.00
					½ oz	135.00
					1 oz	275.00
<b>*CBD Critical Mass</b>  *CBD-Rich Strain: CBD: 8.13% Avg. THC: 5.49% Avg.		<b>Anxiety</b> 	Gram	10.00		
		<b>Arthritis</b> 	1/16 oz	20.00		
		<b>Migraines</b> 	1/8 oz	30.00		
		<b>ADD/ADHD</b> 	¼ oz	65.00		
		<b>Bipolar Disorder</b> 	½ oz	135.00		
		Also used to help with Depression, Muscle Spasms, Nausea, and Stress.			1 oz	275.00
<b>*CBD Medical Haze</b>  *CBD-Rich Strain: CBD: 8% Avg. THC: 4% Avg.			Gram	20.00		
			1/16 oz	40.00		
			1/8 oz	60.00		
			¼ oz	100.00		
			½ oz	175.00		
			1 oz	350.00		

<b>Chemdawg</b>  CBD: 0.2% THC: Up to 20%		Anxiety		Gram	20.00
		Migraines		1/16 oz	40.00
		PTSD		1/8 oz	60.00
		ADD/ADHD		¼ oz	100.00
		Spinal Cord Injury		½ oz	175.00
		Also used to help with Chronic Pain and Depression.			1 oz
<b>*Charlotte's Web</b>  <b>*CBD-Rich Strain:</b> CBD: 75% Avg. THC: 24% Avg.		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Nausea		1/8 oz	60.00
		Pain		¼ oz	100.00
		Stress		½ oz	175.00
		Used to help with ADD/ADHD, Anxiety, Epilepsy, and Migraines.			1 oz
<b>Girl Scout Cookies</b>  CBD: 0.7-1% THC: 18-23%		Anxiety		Gram	15.00
		Migraines		1/16 oz	35.00
		ADD/ADHD		1/8 oz	50.00
		PTSD		¼ oz	75.00
		PMS		½ oz	150.00
		Also used to help with Depression and Pain.			1 oz
<b>La Blanca</b>  THC: Up to 23%		Arthritis		Gram	15.00
		Anxiety		1/16 oz	35.00
		Migraines		1/8 oz	50.00
		Pain		¼ oz	75.00
		PMS		½ oz	150.00
		Also used to help with relaxing muscles and increasing appetite.			1 oz
<b>Larry OG Kush</b>  THC: 18% Avg.		Depression		Gram	20.00
		Insomnia		1/16 oz	40.00
		Lack of Appetite		1/8 oz	60.00
		Pain		¼ oz	100.00
		Stress		½ oz	175.00
		Also used to help with ADD/ADHD, Anxiety, Arthritis, Migraines, and PTSD.			1 oz
<b>Light of Jah</b>  THC: Up to 20%				Gram	15.00
				1/16 oz	35.00
				1/8 oz	50.00
				¼ oz	75.00
				½ oz	150.00
		1 oz	300.00		
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.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			¼ oz	100.00
			½ oz	175.00
			1 oz	350.00
<b>Mega Jackpot</b>  THC: Up to 25%		Anxiety  Chronic Pain  Nausea  Migraines  Also used to help with Insomnia.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			¼ oz	100.00
			½ oz	175.00
			1 oz	350.00
<b>OG's Kush</b>  THC: 16-24% Avg. THCA: 21% Avg.		Anxiety  Migraines  ADD/ADHD  PMS  Bipolar Disorder  Also used to help with Anxiety, Migraines, and PMS.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			¼ oz	100.00
			½ oz	175.00
			1 oz	350.00
<b>Purple OG</b>  CBD: TBD THD: TBD		Depression  Headaches  Insomnia  Pain  Stress  Also used to help with Anxiety, Migraines, and PMS.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			¼ oz	100.00
			½ oz	175.00
			1 oz	350.00
<b>Sour Diesel</b>  CBD: Medium THC: 19-21%		Anxiety  Migraines  ADD/ADHD  Bipolar Disorder  PTSD  Also used to help with Depression, Insomnia, HIV-AIDS, Nausea, Pain, and Stress.	Gram	20.00
			1/16 oz	40.00
			1/8 oz	60.00
			¼ oz	100.00
			½ oz	175.00
			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
			¼ oz	100.00
			½ oz	175.00
			1 oz	350.00

<b>Strawberry Cough</b>  CBD: TBD THC: TBD		<b>Anxiety</b> 	<b>Gram</b>	20.00
		<b>Migraines</b> 	<b>1/16 oz</b>	40.00
		<b>ADD/ADHD</b> 	<b>1/8 oz</b>	60.00
		<b>Bipolar Disorder</b> 	<b>1/4 oz</b>	100.00
		<b>Gastro. Disorder</b> 	<b>1/2 oz</b>	175.00
			<b>1 oz</b>	350.00
<b>Strawberry Ice</b>  THC: 8-15%		Used to help with Stress, Chronic Pain, and Nausea.	<b>Gram</b>	15.00
			<b>1/16 oz</b>	35.00
			<b>1/8 oz</b>	50.00
			<b>1/4 oz</b>	75.00
			<b>1/2 oz</b>	150.00
			<b>1 oz</b>	300.00
<b>Super Nova</b>  TCH: Up to 25%		Used to help with Anorexia, Anxiety, Chronic Pain, and Insomnia.	<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>Super Silver Haze</b>  CBD: 0.01% Avg. CBN: 0.14% Avg. THC: 14.7% Avg.		<b>Anxiety</b> 	<b>Gram</b>	15.00
		<b>Migraines</b> 	<b>1/16 oz</b>	35.00
		<b>PMS</b> 	<b>1/8 oz</b>	50.00
		<b>PTSD</b> 	<b>1/4 oz</b>	75.00
		<b>Epilepsy</b> 	<b>1/2 oz</b>	150.00
		Also used to help with Depression.	<b>1 oz</b>	300.00
<b>Waikiki Queen</b>  THC: Up to 24%		Used to help with Chronic Pain and Depression.	<b>Gram</b>	15.00
			<b>1/16 oz</b>	35.00
			<b>1/8 oz</b>	50.00
			<b>1/4 oz</b>	75.00
			<b>1/2 oz</b>	150.00
			<b>1 oz</b>	300.00
<b>White Queen</b>  TCH: Up to 25%		<b>Depression</b> 	<b>Gram</b>	20.00
		<b>Fatigue</b> 	<b>1/16 oz</b>	40.00
		<b>Insomnia</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 and Migraines.	<b>1 oz</b>	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 	¼ oz	100.00
		Stress 	½ oz	175.00
		Also used to help with Anxiety, Migraines, PTSD, Gastro. Disorders, and ADD/ADHD.	1 oz	350.00

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
			¼ oz	100.00
			½ 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
			¼ oz	75.00
			½ 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 	¼ oz	100.00
		Stress 	½ oz	175.00
		Also used to help with Anxiety, Cancer, Migraines, ADD/ADHD, PMS, Multiple Sclerosis	1 oz	350.00

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 	¼ oz	100.00
		Stress 	½ oz	175.00
		Also used to help with Anxiety, Migraines, ADD/ADHD, Gastr. Disorder, and Hypertension	1 oz	350.00

**Specialty Products**

Specialty Products	Price Range
Pure Medical Cannabis Balm	Between \$15.00 - \$20.00 Each
Bath Salts (8oz jar)	Between \$15.00 - \$20.00 Each
Hemp Soap (4oz bar)	Between \$3.00 - \$6.50 Each
Cannabis Lotion	Between \$9.00 - \$20.00 Each
Cannabis CBD Salve	Between \$18.00 - \$20.00 Each
CBD Oil (10ml)	Between \$45.00 - \$50.00 Each
Cannabis Tinctures	Between \$35.00 - \$48.00 Each
<b>Pre-Rolled Medical Cannabis Joints</b>	
Individual Pre-Rolled; 1g each	Between \$3.00 - \$10.00 Each <i>(depending on strain)</i>
5-individually Pre-Rolled Pack; 1g each	Between \$40.00 - \$80.00 Per pk. <i>(depending on strain)</i>

Smoking Pipes		
	Item	Donation
Glass Pipes		3.00
Water Pipes		14.99

Vaporizers		
Item		Donation
Cloud V Portable Mini Vaporizer Pen	 <p>The most award-winning portable vaporizer</p>	54.99
V2 Vaporizer Kit		124.99
Vaped Titan Essential Oil and Dry Herb Vapor		244.99
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		
Item		Donation
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>	 <p>8.99</p>
	<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>	 <p>11.99</p>
	<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>	 <p>5.50</p>
	<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>	 <p>9.99</p>
	<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>	 <p>15.50</p>

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

Storage Boxes		
	Item	Donation
	<p><b>Wolf T3L 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 larger grinder and everything else you might need. Price does not include contents.</p> <p>Dimensions 20.5cm x 18.5cm x 8cm</p>	 <p>45.00</p>
	<p><b>Wolf T4 Deluxe Stash Box</b></p> <p>Superbly made from Red Birch Hardwood. The T4 is without question a superb piece of work! 5 removable sections, magnetized and sliding v profile. The T4 deluxe is lockable and come complete with a set of keys. Price does not include contents.</p> <p>Dimensions 23cm x 21.5cm x 7cm</p>	 <p>67.50</p>
	<p><b>Wolf T5 Deluxe Stash Box</b></p> <p>Limited Edition - Superbly made from Red Birch Hardwood. The T5 is without question a beautifully crafted limited edition rolling box. There are four internal boxes, two storage and two sifters. The T5 deluxe is lockable and is individually numbered. Price does not include contents.</p> <p>Dimensions 29cm x 24.5cm x 7cm</p>	 <p>165.00</p>

Cleaning Products		
	Item	Donation
	<p><b>420 Sanitizing Wipes</b> Easily sterilizes the mouthpiece of pipes or vaporizers; 100 wipes per box.</p> 	6.95
	<p><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.</p> 	10.95
	<p><b>RezBlock Concentrate</b> Keeps resin from building up in water pipes; bottle contains up to 60 uses.</p> 	13.95
	<p><b>OCD Bundle</b></p> <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

## Services

As a not-for-profit organization, Guided Steps Compassion Center intends to offer the following, but not limited to, programs and services to patients for free or very nominal fee:

- **Educational Programs**

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

Guided Steps Compassion Center intends to “live stream” 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 have access to the course. Stringent security measures to validate patient information will be developed, tested, and in place before the on-line classes are rolled out.

- **Compassionate Courier Service**

Patients able to administer their own medication, **not** requiring a designated caregiver for assistance, and have no transportation to the facility to obtain their medication will have the option of calling in their order or ordering online for their medication to be transported securely and safely to their residence.

***Please see Appendix G – SOP 110: Compassionate Courier Service.***

- **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 help 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.

**Compassionate Care Discounts**

Guided Steps will be committed to providing quality 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 be liberally applied, and 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 intends to offer the following discounts:

- 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 medicine to patients within legal dispensing guidelines and terms recommendation
- d. **Sliding Scale/Free Medicine Services**
  - i. Seriously ill patients who cannot afford medical cannabis
- e. **Compassionate Care Jar Program**
  - i. 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
  - ii. 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. **General Discounts**
  - i. 20% Senior Citizen discount (patients 65 years of age or older); and
  - ii. Member patients who cannot afford medication (based on total income below 200% of the Federal Poverty Level Guidelines).
- g. **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 1/4 oz. medical cannabis ( <i>Guided Steps choice</i> )
5,000	Free 1/2 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.

## 2. Packaging

This section shall contain an example of the design and security features of the containers proposed for use both in the retail store as well as the packaging for dispensed marijuana. This section should demonstrate compliance with the requirements for Medical Marijuana packaging as contained in the Act, the Regulations, and this RFP.

### Response I.2

Guided Steps Compassion Center intends to use pharmaceutical grade bottles and jars with child-resistant closures (***please see example in Response 3.a***).

Bottles and jars will be labeled as follows to demonstrate the medical marijuana is for medical use only; not for resale; the safety warning to keep medicine out of reach of children; and there are no chemical additives in the medicine (***please see example in Response 3.a***).

## 3. Operations

This section shall contain a draft Operations Manual demonstrating compliance with the Scope of Services in this RFP, the Act, and the Regulations. Should the proposal be selected, the Operations Manual shall be finalized, implemented, and maintained on the premises. It shall also be supplied to the Department for review.

### Response I.3

The draft Guided Steps Compassion Center Operations Manual, which demonstrates compliance with Section 7.3 of 4470 State of Delaware Medical Marijuana Code, is attached hereto as **Appendix E**.

Below are the Standard Operating Procedures (SOPs) and applicable forms Guided Steps Compassion Center intends to utilize. **Please see Appendix T for further information.**

- **SOP 100: Standard Operating Procedures (SOPs) (Pages 257-263)**
- **SOP 101: Employee Training and Development (Pages 264-268)**
  - SOP Acknowledgement Form (Page 269)
  - Training Record (Page 270)
- **SOP 102: Safety & Security (Please see Appendix K)**
  - Incident Report
  - Incident Report Form
  - Visitor Log
  - Office Key Assignment Log
  - Access Badge Assignment Log
  - Facility Inspection Log
  - Robbery Response Kit
- **SOP 103: Visitors (Pages 271-275)**
  - Visitor Log (Page 276)
  - Incident Report (Page 277)
- **SOP 104: Audits (Pages 278-283)**
  - Internal Audit Checklist (Page 284-287)
  - Audit Outcome Report (Page 288)
  - Internal Audit Log (Page 289)
- **SOP 105: Incident Reporting (Pages 290-294)**
  - Incident Report (Page 295)
  - Incident Report Log (Page 296)
- **SOP 106: CAPA (Pages 297-302)**
  - CAPA Report (Page 303)
  - CAPA Report Log (Page 304)
- **SOP 107: Archiving (Pages 305-309)**

- Archive Status Log (*Page 310*)
- **SOP 108: Growing, Cultivating & Disposal (*Please see Appendix H*)**
  - Staff Log
  - Daily Grow Room Checklist
- **SOP 109: Inventory Management (*Pages 311-317*)**
- **SOP 110: Medical Cannabis Quality Assurance Testing (*Please see Appendix J*)**
- **SOP 111: Compassionate Courier Service (*Please see Appendix G*)**
  - Incident Report
  - Transportation Manifest
- **SOP 112: Business Continuity/Disaster Recovery Plan (*Pages 318-326*)**

**Please note these SOPs and forms will be updated once Guided Steps Compassion Center is operational and the procedures are further defined.**

Guided Steps Compassion Center intends to utilize MJ Freeway software and hardware systems for the following:

- Patient/Caregiver Database Management
- Inventory Management
- Grow Tracker
- Bar Coding
- Labeling
- Point-of-Sale Services

***Please see Appendix P for further details regarding MJ Freeway services.***

#### **4. Testing Plan**

As indicated in the Scope of Services.

The compassion center shall have a detailed procedure regarding the testing of marijuana produced for medical use to confirm it is free of contaminants and to determine the potency of all active ingredients or cannabinoids. The procedure shall contain a description of how the marijuana will be tested, including:

- a. Whether the testing will be conducted in house or through a contracted facility;
- b. How the marijuana will be transported securely in connection with such testing;
- c. What tests will be conducted, including what testing procedures are used to perform the tests;
- d. How the results are tracked and how samples are disposed; and
- e. The selection process and number of samples tested.

#### **Response I.4**

Guided Steps Compassion Center intends to utilize Steep Hill Halent Laboratories for medical cannabis testing and analysis (***please see details provided in Response 3.b***).

**5. Growing Strategy**

As indicated in the Scope of Services.

**Response I.5**

Guided Steps Compassion Center intends to use a hydroponic grow strategy for the following reasons:

1. Hydroponic systems eliminate insects or pesticides that live in soil that can kill or destroy plant growth.
2. Hydroponic systems allow for greater control over the PH stability and monitoring of the plant. Nutrients can easily be added to the water depending on the plants needs and then is feed directly to the plants roots.
3. Growth rates can nearly double when medical marijuana is grown hydroponically.

Guided Steps Compassion Center intends to follow the growth life cycle described below:

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

[REDACTED]

Once the growth cycle is established, Guided Steps Compassion Center will develop and implement a stringent rotation to ensure there is always enough inventory of medical marijuana to meet the demands of our patients, as well as remain in compliance with Sections 7.2.6.1 and 7.2.6.2 of the State of Delaware Medical Marijuana Code. Once defined, the procedure will be documented in a Standard Operating Procedure (SOP) and applicable staff will be trained to ensure compliance.

***Please see Appendix below for further information:***

- ***Appendix H – SOP 108: Growing, Cultivation & Disposal***

**6. Outreach Plans**

The compassion center shall have a plan for educating the registered patients and registered caregivers impaneled to the compassion center about the medical use of marijuana. The plan should include a description of how the information will be dispersed to the patients. This plan should include, but is not limited to, the following:

- a. Providing each new registered patient who visits the compassion center with written Frequently Asked Questions, designed by the Department, that explains the limitations on the right to use medical marijuana under the law;
- b. Knowledge of state and federal laws related to marijuana use, including the laws related to transportation of the drug across state lines (e.g. taking it on vacation, etc.);
- c. Education on ingesting options of usable marijuana that are available from the compassion center, as well as availability of required paraphernalia needed to make use of those options;

- d. Education on safe smoking techniques available to patients, and paraphernalia required to make use of those techniques; and
  - Education on the potential side effects of using medical marijuana.

### **Response I.6**

Guided Steps Compassion Center intends to provide the following educational training and material to registered patients and caregivers in the form of a **Welcome Packet** during the Intake Process:

1. Welcome Letter
2. Copy of signed Patient/Caregiver Code of Conduct Agreement
3. Guided Steps Compassion Center Member Discounts and Services
4. List of Frequently Asked Questions (*designed by State of Delaware DHSS*)
5. Federal Government Marijuana Enforcement Policy
6. Guided Steps Compassion Center Medical Cannabis/Treatment List
7. The Human Endocannabinoid System
8. Know Your Medicine – Ailments and Corresponding Cannabis
9. Ways to Consume Medical Marijuana
10. Traveling with Medical Marijuana

### ***Please see Appendix Q – Sample Welcome Packet.***

Guided Steps Compassion Center intends to offer the following, but not limited to, Outreach Services to patients and caregivers free of charge:

- **Medical Marijuana 101** for all new patients of Guided Steps Compassion Center. This program will educate new patients on the different medical marijuana strains, associated treatments, potential side effects, different methods of usage and associated paraphernalia, and the human Endocannabinoid system.
- **Senior Support Program** specifically for seniors who are new to medical cannabis and have family who are not supportive of it. The goal will be 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** for patients who do not have the support of their family for the use of medical cannabis. The goal will be 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.
- **Patient Substance Abuse Support Program** for patients who feel comfortable to discuss and face their addictions. The goal for this program will be to discuss ways the use of medical cannabis, positive surroundings, and positive thinking can help one overcome addictions (*conducted by experienced and licensed counselor*).

Additional Outreach Services will be added based on patient/caregiver feedback and as new medical marijuana research or information becomes available.

**7. Required Training**

This section should outline the proposed training curriculum for the agents of the compassion center, as well as the proposed outreach education for the patients and caregivers.

**Response I.7**

Guided Steps Compassion Center agents and volunteers will receive, but not limited to, the following training topics:

- a. Chapter 49A – The Delaware Medical Marijuana Act
- b. 4470 State of Delaware Medical Marijuana Code
- c. Delaware Code – Section 1121: Patient’s Rights
- d. Confidentiality, Privacy, and HIPPA
- e. Ethics in Healthcare
- f. HIPPA and Breach Notification
- g. HIPPA Electronic Security
- h. Medical Marijuana Strains, Treatments, and Usage
- i. Guided Steps Compassion Center’s
  - i. Operations Manual (***Please see Appendix E***)
  - ii. Standard Operating Procedures (SOPs and applicable forms) (***as indicated in Response I.3, Pages 45-46***)

**8. Pricing and Payment**

This section should include proposed pricing schedules for the retail medical marijuana products and paraphernalia as well as for patient and caregiver education and outreach services. It should include related information, such as a sliding scale, that may be used to provide access to affordable medical marijuana by impaneled patients enrolled in Medicaid or receiving Supplemental Security Income or Social Security Disability Insurance.

This section should also include a financial policy plans including payment schedules that may be offered to patients, examples of receipt-of-payment forms, and a list of the forms of payment the compassion center will accept (cash, checks, credit/debit).

**Response I.8**

Guided Steps Compassion Center intends to offer the following donation schedule for registered patients and caregivers:

***Please see Section I.1 for pricing of medical marijuana and paraphernalia.***

Guided Steps Compassion Center will accept cash and debit card donations from patients and caregivers.

Guided Steps Compassion Center intends to offer a Sliding Donation Scale for patients or caregivers who are unable to afford donations due to low income, enrolled in Medicaid or receiving Supplemental Security Income or Social Security Disability Insurance. This Sliding Donation Scale will be based on the Federal Department of Health and Human Services 2014 Annual Update of the HHS Poverty Guidelines (Federal Register, Vol. 79, No. 14, Wednesday, January 22, 2014, Notices, Pages 3593 and 3594). (***Please see Appendix R for information regarding the Guided Steps Compassion Center Sliding Donation Scale program.***)

Guided Steps Compassion Center intends to offer the following, but not limited to, Outreach Services to patients and caregivers free of charge:

- **Medical Marijuana 101** for all new patients of Guided Steps Compassion Center. This program will educate new patients on the different medical marijuana strains, associated treatments, potential side effects, different methods of usage and associated paraphernalia, and the human Endocannabinoid system.

- **Senior Support Program** specifically for seniors who are new to medical cannabis and have family who are not supportive of it. The goal will be 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** for patients who do not have the support of their family for the use of medical cannabis. The goal will be 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.
- **Patient Substance Abuse Support Program** for patients who feel comfortable to discuss and face their addictions. The goal for this program will be to discuss ways the use of medical cannabis, positive surroundings, and positive thinking can help one overcome addictions (*conducted by experienced and licensed counselor*).

Additional Outreach Services will be added based on patient/caregiver feedback and as new medical marijuana research or information becomes available.

**9. Record Retention Information**

This section should contain information about the secure storage of records and the amount of time required to produce a file if requested by the Department. It should provide a description of the location and security of on-site storage of records, both electronic and paper. This is also the section where an address and company name should be provided for where the offsite retention of records will take place.

**Response I.9**

Guided Steps Compassion Center will utilize Iron Mountain for secure off-site record retention and shredding services.

**Iron Mountain (Headquarters)**  
**1 Federal Street**  
**Boston, MA 02110**  
**(800)935-6966**  
**[www.ironmountain.com](http://www.ironmountain.com)**

Secure record storage steps will occur as follows:

1. Schedule pick-up via phone or online.
2. Pack material to be archived in Iron Mountain boxes and label accordingly.
3. Iron Mountain will pick-up boxes and transport to their secured facility.
4. If records need to be retrieved, submit request via secured online system.
5. Records will be delivered within 1 business day.

Guided Steps Compassion Center will also have confidential shredding services through Iron Mountain. Secured shred bins will be placed within designated areas where all confidential (patient and/or company) material will be placed for shredding. Iron Mountain will come to the compassion center at scheduled times to pick-up full bins and leave empty bins in their place.

***Please see Appendix S for further information regarding Iron Mountain services.***

## 10. **Form Samples**

This section should include samples of proposed forms to be used in the operation of the compassion center. For example, a compassion center may want to have liability forms or patient consent forms for the purpose of agreement to hold harmless the compassion center or organization in the smoking of a product known to be a carcinogen. The organization may want to have employees sign an awareness of confidentiality and voluntary nature of services statement. Or the compassion center may have a form or list of acceptable items of proof for a patient requesting a sliding scale price for services rendered or product sold.

### **Response I.10**

Guided Steps Compassion Center intends to utilize the following, but not limited to, forms in operating the compassion center:

1. Patient/Caregiver Registration Form (*Page 327*)
2. Indemnification and Hold Harmless Clause (*Page 328*)
3. Patient/Caregiver Code of Conduct (*Page 329*)
4. Acknowledgement of Confidentiality of Patient/Caregiver Information (*Page 330*)
5. Welcome Packet (***Please see Appendix Q***)
6. Sliding Donation Scale Form and Guidelines (***Please see Appendix R***)
7. SOP Forms (***Please see Response I.3, Pages 45-46***)
8. Volunteer Application and Agreement Form (*Pages 331-322*)

***Please see Appendix U for forms listed above, unless noted otherwise.***

Guided Steps Compassion Center will update the Operations Manual, Standard Operating Procedures (SOPs), and related forms once the Compassion Center is established and procedures are further defined.

## J. **Certification and Statement**

The bidder must include statements that the applicant agency complies with all Federal and Delaware laws and regulations pertaining to equal opportunity and affirmative action. In addition, compliance must be assured in regard to Federal and Delaware laws and regulations relating to confidentiality and individual and family privacy in health care delivery and in the collection and reporting of data. (See Appendices D & E)

### **Response J**

***Please see the following Appendices for signed forms:***

- ***Appendix V – Certification Sheet***
- ***Appendix W – Statements of Compliance Form***

## K. **Budget**

A list of financial obligations and fiscal operating principles that will be required of the selected vendor is included in the Scope of Services section of this RFP. In addition to demonstrating availability of sufficient capital to establish and maintain the compassion center, the proposal should also include a financial business plan that incorporates the listed obligations and principles. Sources of funding shall be identified as described in the records section of this RFP.

Suggested formats for a line item budget are included in Appendices A & B of this RFP. Details of specific equipment required should be included in the budget worksheet, including price of purchase or lease and how it will be used. Applicants shall also describe any factors that may have an impact on the projected budget.

A proposed plan for providing medical grade marijuana to registered, qualifying patients enrolled in Medicaid or receiving Supplemental Security Income or Social Security Disability Insurance should be placed in this section as well



Guided Steps Compassion Center intends to implement the budget structure outlined below.

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.

As the total number of registered patients is unknown at this time, three different Profit & Loss scenarios were compiled.

**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
29 Del.C. Ch. 100 Freedom of Information Act			
MONTHLY INCOME	29 Del.C. Ch. 100 Freedom of Information Act		
EXPENSES	1st Yr*	2nd Yr	3rd Yr
29 Del.C. Ch. 100 Freedom of Information Act			
TOTAL	29 Del.C. Ch. 100 Freedom of Information Act		
BREAKDOWN	1st Yr	2nd Yr	3rd Yr
Income	29 Del.C. Ch. 100 Freedom of Information Act		
Expenses			
PROFIT/LOSS	29 Del.C. Ch. 100 Freedom of Information Act		

1st Year (Jul-Dec)	# of Patients	*Sales	Total
Jul	0	\$0	Grow time
Aug	0	\$0	Grow time
Sep	0	\$0	Grow time
Oct	100		29 Del.C. Ch. 100 Freedom of Information Act
Nov	200		
Dec	300		
<b>TOTAL</b>	<b>600</b>		

2nd Year	# Patients	*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	*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>		

\*Does not include sales from paraphernalia/accessories

\*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

**Scenario 2**

P&L based on low # of patients purchasing between 3-6ozs 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>		

29 Del.C. Ch. 100 Freedom of Information Act  
MONTHLY INCOME 29 Del.C. Ch. 100 Freedom of Information Act  
EXPENSES 29 Del.C. Ch. 100 Freedom of Information Act

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

<b>TOTAL</b>	29 Del.C. Ch. 100 Freedom of Information Act
<b>BREAKDOWN</b>	
Income	29 Del.C. Ch. 100 Freedom of Information Act
Expenses	
<b>PROFIT/LOSS</b>	

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



Appendix A – Articles of Incorporation

PAGE 1		<b>State of Delaware</b> SECRETARY OF STATE DIVISION OF CORPORATIONS P.O. BOX 898 DOVER, DELAWARE 19903	140159825
9021484 GUIDED STEPS COMPASSION WELLNESS FOUNDATION 200 S. DUPONT BLVD. STE. 106 SMYRNA DE 19977		02-17-2014	
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-Kent County	6.00
		Page Assessment-Kent 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.

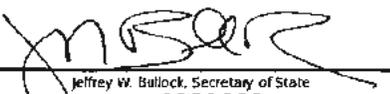
A FILED COPY OF THIS CERTIFICATE HAS BEEN FORWARDED TO THE KENT COUNTY RECORDER OF DEEDS.



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: 1138666

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 140159825 - 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

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

Name Ramane Jones

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

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

• **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, A.D. 2014.

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

(Incorporator)

NAME: Fabian Livingston

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.

1/28/2014

## Appendix B – Proposed Operating By-Laws

### 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 Title 16 Chapter 49A The Delaware Medical Marijuana Act § 4919A, as a not-for-profit basis.

#### 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 thereof 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 of 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 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.

**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

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 and Wellness 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.

*<Remainder of this page intentionally left blank>*

## Appendix C – Proposed Non-Profit Operating Agreement

### Non-Profit Operating Agreement for Guided Steps Compassion and Wellness Center, LLC

This is a Limited Liability Company Operating Agreement (the “Agreement”) made on \_\_\_\_\_, 2014.

The Members in this Agreement are as follows:

1. Fabian B. Livingston
2. Ramane O. Jones

The Members to this Agreement agree to the following:

#### **Name:**

This Limited Liability Company will be known as Guided Steps Compassion and Wellness Center (the “LLC” or “Company”).

#### **The LLC:**

- a) The Members have formed a Limited Liability Company.
- b) The terms and conditions of their LLC will be outlined in this Agreement.
- c) If the Agreement is executed, the LLC Operating Agreement will be in effect on July 1, 2014.
- d) The LLC will only be terminated as outlined in this Agreement.
- e) The LLC’s primary place of business will be 73 Artisan Drive, Smyrna, Delaware, 19977.
- f)
- g) The LLC will be governed under the laws of the state of Delaware.
- h) The LLC’s primary purpose is a medical marijuana compassion and wellness center.

#### **Registered Office and Agent:**

The Company’s Managers may, in accordance with the voting authority established above, change the principal office, registered office, or registered agent of the Company, or establish additional agents, offices, or places of business of the Company from time to time.

#### **Contributions:**

The Members will make an initial contribution to the LLC as follows:

Contributions will be submitted no later than July 1, 2014. All capital contributions are final unless all Members give written consent of withdrawal. All contributions will be deposited into a joint capital account.

#### **Interest:**

The Members’ ownership interest in the LLC will be as follows:

#### **Costs:**

The Company shall reimburse the Managers or Members for all direct out-of-pocket expenses incurred by them in managing the Company.

**Profits & Losses:**

- a) As the Company is a not-for-profit organization, Members will not share the net profits and losses of the LLC.

**Members and Managers:**

- a) The liability of the Members is limited according to the Limited Liability statutes of the Company.
- b) No Member shall be an agent of any other Member by reason of being a Member of the Company.
- c) All Members of the LLC, by majority vote of Member interest, will maintain 1 Manager(s) to be re-elected annually. All Members will vote in each election.
- d) Members that are not elected as Managers shall not have any control or vote in the operation of the Company's affairs and shall have not power to bind the Company.
- e) The Managers' voting authority will be defined by the following unless otherwise stated in the Agreement: All decisions for contract or otherwise will be made based on a majority vote by percent of ownership. Each Manager will have the authority based on their percent ownership outlined above in the Agreement.

**Proxies:**

At all meetings of Members, a Member may vote in person or by proxy executed in writing by the Member or by his or her duly authorized attorney-in-fact. Such proxy shall be filed with the Managers of the Company before or at the time of the meeting. No proxy shall be valid after eleven (11) months from the date of its execution, unless otherwise provided in the proxy.

**Filing of Notices:**

The Managers of the Company shall be responsible for preparation, maintenance, filing, and dissemination of all necessary returns, notices, statements, reports, minutes or other information to the Internal Revenue Service, the state of Delaware, the Members of the Company, and any other appropriate state or federal authorities or agencies. The Managers may delegate this responsibility to a single Manager in accordance with the voting authority established above.

**Liability of Members and Managers:**

All debts, obligations and liabilities of the LLC, whether arising in contract, tort or otherwise, shall be solely the debts, obligations and liabilities of the LLC and no Member shall be obligated personally for any such debt, obligation or liability of the LLC solely by reason of being a Member. However, each Member remains personally liable for payments of his, her or its Capital Contribution as set forth in the Act or as otherwise provided in this Agreement. This section does not prevent an LLC Member, should they so choose, from separately agreeing to guaranty or otherwise become liable for a debt which is also of the LLC.

**Indemnification:**

The Company shall indemnify the Members, Managers, and agents for all costs, losses, liabilities and damages paid or accrued by the Member, Manager or agent in connection with the Company's business, to the fullest extent provided or allowed by the laws of Delaware.

**Accounting:**

- a) All accounts related to the LLC will be audited every six (6) months.

- b) All Members will maintain a joint contribution account. Members will keep accurate and complete books of account for all accounts related to the LLC. Any member, whether majority or minority, will be allowed to review all books of account at any time they request.
- c) Accounting records will be kept on a cash basis.
- d) All financial records including tax returns and financial statements will be held at the LLC's primary business address and will be accessible to all members.
- e) The fiscal year will be complete on the last day of December of each year. All Members will present their position on the state of the LLC within two (2) weeks of the completion of each fiscal year.
- f) The following Members will be able to sign checks from any joint Member account:
  - a. Fabian B. Livingston
  - b. Ramane O. Jones

**New Members:**

The LLC will amend this agreement to include new Members upon the written and unanimous vote of all Members.

The name of the LLC may be amended if a new Member is added to the LLC upon the written and unanimous vote of all Members.

**Withdrawal or Death:**

The Members hereby reserve the right to withdraw from the LLC at any time. Should a Member withdraw from the LLC because of choice or death, the remaining Members will have the option to buy out the remaining shares of the LLC. Should the Members agree to buy out the shares, the shares will be bought in equal amounts by all Members. The Members agree to hire an outside firm to assess the value of the remaining shares. The Members will have 60 days to decide if they want to buy the remaining shares together and disperse them equally. If all Members do not agree to buy the shares, individual Members will then have the right to buy the shares individually. If more than one Member requests to buy the remaining shares, the shares will be split equally among the Members wishing to purchase the shares. If all Members agree by unanimous vote, the LLC may choose to allow a non-Member to buy the shares thereby replacing the previous Member.

If no individual Member(s) finalize the purchase agreement by 60 days, the LLC will be dissolved.

The name of the LLC may be amended upon the written and unanimous vote of all Members if a Member is successfully bought out.

**Power of Legal Representative:**

If a Member who is an individual dies or a court of competent jurisdiction adjudges the Member to be incompetent to manage his or her person or property, the Member's personal representative, administrator, guardian, conservator, trustee, or other legal representative shall have all of the rights of an assignee of the Member's interest. If a Member is a corporation, trust, partnership, Limited Liability Company or other entity and is dissolved or terminated, the powers of that Member may be exercised by its legal representative or successor.

**Dissolution:**

Should the LLC be dissolved by majority vote or otherwise, the LLC will be liquidated, and the debts will be paid. All remaining funds after debts have been paid will be distributed based on the percentage of partnership of ownership interest outlined in this Agreement. An assignment or sale of a Member's

interest in the Company does not result in the dissolution of the Company. For the avoidance of doubt, the granting of a lien on any amount of Member interest is not deemed to be an assignment.

**Liquidation:**

Upon dissolution of the Company, the Managers or one of their members that they select shall liquidate the Company's assets and shall do so as promptly as is consistent with obtaining fair value for them, and shall apply and distribute the assets of the Company as follows:

- a) First, to the payment and discharge of all of the Company's debts and liabilities to creditors of the Company other than the Members;
- b) Second, to the payment and discharge of all of the Company's debts and liabilities to creditors of the Company that are Members;
- c) Third, to the Members in accordance with their capital accounts, after giving effect to all contributions, distributions and allocation for all periods.

**Amendments:**

- a) Amendments may be made hereto upon the unanimous and written consent of all Members.
- b) Amendments must be expressly written and have the original signatures of all Members.

**Settling Disputes:**

All Members agree to enter into mediation before filing suit against any other Member or the LLC for any dispute arising from this Amendment or LLC. Members agree to attend one session of mediation before filing suit. If any Member does not attend mediation, or the dispute is not settled after one session of mediation, the Members are free to file suit. Any law suits will be under the jurisdiction of the state of Delaware.

**Action Without Meeting:**

Any action required or permitted to be taken by the Managers at a meeting may be taken without a meeting if a consent in writing, setting forth the action so taken, and shall be signed by all of the Managers.

**No State Law Partnership:**

The Members intend that the Company may not be a partnership (including, without limitation, a limited partnership) or joint venture, and that no Member or Manager is a partner or joint venture of any other Member or Manager, for any purpose other than federal and state tax purposes, and this Operating Agreement may not be construed to suggest otherwise.

**Choice of Law and Severability:**

This Agreement shall be construed in accordance with the internal law of the state of Delaware. If any provision of this Agreement shall be contrary to the internal laws of the state of Delaware or any other applicable law, at the present time or in the future, such provision shall be deemed null and void, but this shall not affect the legality of the remaining provisions of this Agreement. This Agreement shall be deemed to be modified and amended so as to be in compliance with applicable law and this Agreement shall then be construed in such a way as will best serve the intention of the parties at the time of the execution of this Agreement.



**Entire Agreement:**

This Agreement constitutes the entire agreement among the Members regarding the terms and operations of the Company, except for any amendments to this Agreement adopted in accordance with the terms herein. This Agreement supersedes all prior and contemporaneous agreements, statements, understandings, and representations of the parties regarding the terms and operation of the Company, except as provided in the preceding sentence.

All Members signed hereto agree to the above stated Agreement.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_

\_\_\_\_\_  
Fabian B. Livingston

\_\_\_\_\_  
Ramane O. Jones

## Appendix D – Bios and 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.



**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 administering 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.

**Elizabeth A. Ford**

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

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

## **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
  - System flow diagrams
  - System presentations
  - Change requests
- 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.
- 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 \$25MM 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

# Wilmington University



*Upon the recommendation of the Faculty and  
by authority of the Board of Trustees  
hereby confers upon*

**Elizabeth A. Ford**

*the degree of*

**Bachelor of Science**

**Organizational Management**

*with all the rights and privileges thereto appertaining.*

*In testimony whereof we have hereunto affixed our*

*signatures and the seal of the University*

*this twenty-fifth day of January, 2009.*

*James Lee Ford, Jr.*  
*Chairman of the Board of Trustees*



*D. Jack P. Vaselova*  
*President of the University*

*Dr. Corby Claff*  
*Provost and Vice President for Academic Affairs*

	<h2 style="text-align: center;">Organizational Management</h2>	 <p style="text-align: center;"><b>WILMINGTON COLLEGE</b></p> <p style="text-align: center;">www.wilmcoll.edu (877) 967-5464</p>
	<p><b>Accelerated Core Highlights</b></p> <p><b>Organizational Behavior</b> This leadoff course examines the dimensions of behavioral dynamics with emphasis on formal organizations, and individual and group processes.</p> <p><b>Management Information Systems</b> This course is an overview of management information systems and their use to support business operations.</p> <p><b>Human Resources Management/Compensation and Benefits</b> These courses review the elements required to effectively recruit, select, train, and maintain a workforce and assure that compensation, rewards and benefits contribute to organizational effectiveness.</p>	
	<p><b>Business Communications</b> This course encompasses a detailed study and applications of various types of oral and written communication used in business.</p> <p><b>Legal Aspects of Business</b> The legal and ethical issues in the business environment are examined, including laws relating to contracts and relationships.</p> <p><b>Marketing</b> This course examines the nature and operation of marketing functions, consumer preferences, product planning, promotion, distribution, and pricing.</p> <p><b>Finance for Managers</b> The course reviews the understanding and analysis of financial information, financing the business, budgeting, and decision making for profitability.</p> <p><b>Global Business Management</b> This course examines the political, legal, economic, cultural, and financial factors that influence conducting business in foreign countries.</p> <p><b>Operations Management</b> The course focuses on forecasting, operations planning and scheduling, material requirements, purchasing, process design, and quality management.</p> <p><b>Project Management</b> The project manager role in scheduling, budgeting, quality, risk management, communications, and project variances and changes is the key course focus.</p> <p><b>Current Topics in Business</b> The course examines current topics in leadership and management including leadership styles and organizational and ethical considerations.</p> <p><b>Organizational Project</b> This two-part course guides students through a structured process of identifying an organizational problem in the workplace, developing a problem statement, constructing the problem background, analyzing data, identifying current problem-solving tactics and providing recommendations to resolve the dilemma.</p>	<p style="text-align: right;"><i>New Castle</i></p> <p style="text-align: right;"><i>Dover</i></p> <p style="text-align: right;"><i>Dover AFB</i></p> <p style="text-align: right;"><i>Georgetown</i></p>
	<p>8/05</p>	

Wilmington University  
Office of the Registrar  
320 DuPont Hwy.  
New Castle, DE 19720

Page 1 of 2

Student Name : Ford, Elizabeth A

Student ID : 29 Del.C. Ch. 100 Freedom of I

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



STUDENT COPY

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320 DuPont Hwy.  
New Castle, DE 19720

Page 2 of 2

Student Name: Ford, Elizabeth A.

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



STUDENT COPY



**Gia Monique Livinaston**

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

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

**OBJECTIVE**

To build a career with a medical marijuana dispensary where my skills in customer service, office management, patient management, cannabinoid and medical cannabis industry research can be utilized, with an opportunity for advancement within the company.

**EXPERIENCE**

**Department of Veterans Affairs, Philadelphia, PA, 2008 – Present**

**Medical Support Assistant**

- Perform general clerical and administrative support to the Primary Care and Surgical/Specialty services including Orthopedic, Vascular and Urology).
- Assist with KIOSK check in and managing its data.
- Receive, screen and handle all incoming telephone calls and requests from physicians, families of patients and support staff for requests such as medication renewals, eligibility, routine release of information, urgent care, schedule coordinating etc. determining the nature and purpose of the call and if needed directing to the appropriate personnel.
- Review, schedule and coordinate consultation/initial visit request at times acting as a liaison between patients and patient centered care staff at their visit or prior.
- Coordinate travel and special needs requests for patients and their families in a timely manner.
- Perform office automation using software applications to create reports, correspondence and forms used in the clinics ensuring that spelling, punctuation and grammar are reviewed before submitting or finalizing;
- Organize statistical data (EARR report), review and maintain electronic mail (outlook), maintain provider daily calendar (via Microsoft Office), schedule future appointments via VISTA, review and confirm orders such as diagnostic testing placed by physicians via CPRS.
- Assist with completing admissions form for upcoming surgeries.
- Gather patient forms and documents for provider signatures.
- Adhere to all HIPPA and V.A rules and regulations ensuring that patients information is secure at all times.
- Review, screen, and route incoming correspondence and reports via mail or fax.
- Maintain inventory of supplies and equipment and any other administrative duty needed to be executed having professionalism, courtesy and compassion for the staff, patients and their family at all times.

**Main Line Health, Newtown Square, PA, 2007 – 2008**

**Patient Service Representative**

- Provided general clerical functions by checking patients in for their doctor visit;
- Received and screened all incoming calls/visitors to the office;
- Completed all medication requests via telephone or phone message system;
- Called all scheduled patients to remind them of upcoming appointments;
- Typed all physician letters/correspondence as requested;
- Maintained patient files by ensuring all medical testing and notes are available;
- Maintained list of office supplies needed for ordering;
- Completed lab slips/ call labs or diagnostic centers to receive tests results or additional information requested from the physician;
- Maintained the front desk by labeling items, organizing files and charts;
- Processed incoming Medical Records requests and referrals.

---

**Lab Corporation of America, New Castle, DE, 2006 – 2007**

**Client Service Representataive/Specimen Processor**

- Answered over 90 incoming calls per day; from patients, doctors/physicians, nurses requesting testing results.
- Investigated/researched all problems and concerns with specimen/testing.
- Processed all incoming specimen in company data base which there was a certain batch per hour requirement and deadline.

**SKILLS**

- Customer service
- Office management
- Retail sales
- Medical marijuana industry

**EDUCATION**

**Clark Atlanta University, Atlanta, GA – Major: Psychology**

GPA: 3.25

Credits Earned: 80 Semester hours

**Temple University, Philadelphia, PA – Major: Psychology**

GPA: 3.0

Credits Earned: 80 Semester hours

**ADDITIONAL TRAINING**

**Cannabis Training University - Online Classes San Francisco CA**

- How to grow medical marijuana
- How to cook with medical marijuana
- How to become a bud tender
- How to open a dispensary and delivery service
- Medical Marijuana laws and regulations
- Medical Marijuana as medicine-hypocrisies, lies and miracle revealed

HIPPA Training 5/2008, annually to present

Ethics in Health Care: 7/31/2009

ICB Entry Clerk Training: 8/3/11

Verification Clerk Training: 8/8/11

Soft Skills/Customer Service Training" 7/16/2010

Over 200 hours of research and studies on opening a Medical Marijuana Dispensary

\*\*Microsoft Office, Excel, Typing speed of 40 WPM\*\*\*

**Appendix E – Draft Operations Manual**

	Version	Effective Date
	0.1	DD MMM YYYY
<h1>Operations Manual</h1> <p><i>DRAFT</i></p>		
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	Elizabeth Ford	Initial draft version

DRAFT



**2. Purpose**

The purpose of this document is to outline the operating procedures for Guided Steps Compassion Center ("Guided Steps", the "Company" or "Center").

Guided Steps' Board of Directors, Principal Officers, and Management will meet on a regular basis to discuss and evaluate the Operations Manual (the "Manual") and the procedures contained herein, and to ensure the Company operations continue to meet or exceed the requirements of the State's and Guided Steps' patients in the most responsible and efficient manner.

**3. Mission Statement**

The mission of Guided Steps Compassion Center is to "Guide individuals in their steps to better health and wellness" through not only being a top quality medical marijuana facility, but also in offering wellness programs for our patients.

**4. Organizational Structure**

Guided Steps is organized as a Delaware Non-Profit Organization, and its operations will be overseen by its Board of Directors. The corporate governance structure of Guided Steps shall comply with the applicable provisions of the Delaware Non-Profit Corporation guidelines, and the applicable provisions of its Articles of Incorporation and By-Laws. The roles and general responsibilities of Guided Steps' Board of Directors, principal officers, employees, volunteers, and patients are as follows:

**4.1. Board of Directors**

Guided Steps' Board of Directors consists of five (5) members, all of whom have knowledge and expertise in the fields of healthcare, pharmaceutical, finance, insurance, education, chemistry, and psychology. The following individuals constitute the 5-member Board of Directors:

President/Chairman: Fabian Livingston

Secretary: Ramane Jones

Treasurer: Elizabeth Ford

Member: TBD

Member: TBD

The Board of Directors will have supervision over Guided Steps' business operations. All correspondence to the Board's Chairman will be directed as follows:

Fabian Livingston  
Guided Steps Compassion Center  
73 Artisan Drive  
Smyrna, DE 19977

Guided Steps' Board of Directors positions are unpaid. Also, any medical practitioner who provides written certification of a qualifying patient's medical condition cannot be employed or have a business relationship with Guided Steps.

**4.2. Officers**

**4.2.1. President**

Fabian Livingston is the current President of Guided Steps, and serves at the Board's direction in overseeing day-to-day affairs of the compassion center. In accordance with Guided Steps' By-Laws, the President will have general supervision of all officers, agents, and employees and the management of the Company's business interests.

**4.2.2. Secretary**

Ramane Jones is the Secretary of Guided Steps' Board of Directors. In accordance with Guided Steps' By-Laws, the Secretary will perform the duties customary to such office, and will perform such further duties as may be assigned to him, from time-to-time, by the Board of Directors.

#### 4.2.3. Treasurer

Elizabeth Ford is the Treasurer of Guided Steps' Board of Directors. In accordance with Guided Steps' By-Laws, the Treasurer will perform the duties customary to such office, and will perform such further duties as may be assigned to her, from time-to-time, by the Board of Directors.

#### 4.3. Employees and Volunteers

Guided Steps has conducted extensive research and engaged experts in the medical marijuana field to develop a comprehensive plan for recruiting, hiring, training, and retaining all of the necessary staff for its compassion center. Specific job descriptions are to be found in Section 7.4 of this Operations Manual. Employees and volunteers will fall into the following three (3) categories:

##### 4.3.1. Executive Managers

Guided Steps executive managers are as follows:

- President (1)
- Vice President of Development and Production (1)
- Vice President of Finance and Operations (1)

##### 4.3.2. Support Staff

Guided Steps staff will form the core of Guided Steps operational support, filling such roles as:

- Security Manager (1)
- Security Guards (2)
- Patient Intake Coordinator (2)
- Receptionist (1)
- Master Grower (1)
- Assistant Grower (1)
- Dispensary Manager (1)
- Budtenders (2)
- Cashier (1)
- Courier Delivery Driver (2)

##### 4.3.3. Volunteers

Where feasibly and lawfully permitted, Guided Steps may engage members of the general public in volunteer activities in support of the compassion center. With regard to volunteers who are registered patients of the compassion center, Guided Steps is committed to providing these individuals with the training and opportunity to contribute their valuable time and services to the center as part of a potential program that would compensate them, in whole or in part, with medical marijuana at no or a reduced cost subject to full compliance with, and the extent permitted under all applicable laws, rules, and regulations of the State of Delaware.

As for members of the general public who are not registered patients, Guided Steps is committed to exploring programs lawfully permitted under all applicable laws, rules, and regulations of the State of Delaware that would allow such individuals to contribute their time, money, and/or services for further the Center's mission. Guided Steps' legal counsel is actively engaged in developing the volunteer program, which would be in full compliance with Federal and Delaware laws governing employment.

##### 4.3.4. Patients and Caregivers

Patients and caregivers may come last in this section of the Operations Manual, but Guided Steps' patients and caregivers are first and foremost in every service the Center endeavors to accomplish with its mission, and in the procedures set forth herein. Every member of the Guided Steps team is reminded and encouraged to actively listen, watch, and learn from

our members. The Center's best efforts shall be dedicated, on a daily basis, to providing the most respectful, efficient, and knowledgeable services possible to our members.

Guided Steps is simply not just providing medical marijuana; we are providing a center for care, compassion, and understanding; for easing the burden of obtaining medical marijuana; for discussions about what works and does not work for our patients; for educating our patients, caregivers, and team members on the safest, most effective dosages as well as the best methods of using medical marijuana; and for partnering with the State of Delaware in this important medical service for the benefit of patients.

Guided Steps' patients come first, and it is the duty of all our employees and volunteers to keep these ethics foremost in their minds.

## 5. Logistics

### 5.1. Location

Guided Steps is located in an open space of 5,000 square feet at 73 Artisan Drive, Smyrna, Delaware, 19977 in the Smyrna Business Park.

Free parking is provided, with the number of parking spaces being more than sufficient for the expected demand; handicapped accessibility is ample including without limitation entrance ramps and bathroom facilities.

Directions to Guided Steps Compassion Center are as follows:

#### From the North

- 95 South toward Newark/Baltimore
- Take the DE-7 S exit, EXIT 4A, toward DE-1 S/Christiana/Mall Road
- Merge onto DE-1 S via the ramp on the left
- Merge onto DE-1 S toward US-13 S/Dover/BEACHES (Portions toll)
- Merge onto US-13 S via EXIT 119A toward DE-6/DE-300/Smyrna
- Turn right onto E Glenwood Ave/DE-6/DE-300.
- Continue to follow DE-300
- Turn left onto Artisan Drive (SMYRNA BUSINESS PARK)
- 73 ARTISAN DRIVE is on the right

#### From the South

- US-113 North to DE-1 North
- Take the US-13 exit, EXIT 114, toward DE-300/S Smyrna/DE-6
- Merge onto S DuPont Blvd/US-13 N toward DE-300 W/Smyrna/SMYRNA BUSINESS PARK
- Turn left onto E Glenwood Ave/DE-6/DE-300.
- Continue to follow DE-300
- Turn left onto Artisan Drive (SMYRNA BUSINESS PARK)
- 73 ARTISAN DRIVE is on the right

### 5.2. Hours of Operation

Guided Steps' services are available via appointment only. The hours of operation will be as follows:

Monday through Friday: 9:00AM – 8:00PM

Saturday: TBD based on Town of Smyrna ordinances established

Sunday: TBD based on Town of Smyrna ordinances established.

Holiday Hours: TBD

Extended hours may be implemented based on patient feedback.

### 5.3. On-Site Resources

Guided Steps' patients will be able to benefit from an extensive on-site reference library, as well as a wide variety of accessories. Based on patient registration, responses, and discussions with staff, information about other health resources will be provided including without limitation that which relates to various state, local, and health service providers.

<Add list of library reference materials when established>

## 6. Human Resource Administration

Oversight of Guided Steps' human resources, including without limitation compliance with federal, state, and local employment laws, and all personnel related matters, are the responsibility of Guided Steps' President in conjunction with Vice President of Finance and Operations.

### 6.1. Personnel Records

The Vice President of Finance and Operations will maintain a personnel record for each employee, agent, or volunteer, which will include the following:

- Application for employment or volunteer;
- Record(s) of any disciplinary action taken;
- Documentation of all required training;
  - Signed statement from the individual stating:
    - Date, time, location of training
    - Topic of training
    - Name and title of training instructor

Personnel records will be maintained for a period of six (6) months after termination of an individual's affiliation with Guided Steps. After six (6) months, personnel records will be moved off-site to the Iron Mountain secured record retention center.

### 6.2. Staff Roster

As Guided Steps will be open to the public five (5) days a week, staffing is based on providing full-time positions (40 hours/week) to exempt employees and part-time positions (approximately 24 hours/week) to non-exempt employees required to work Monday through Saturday, providing overlapping coverage to accommodate lunch breaks.

### 6.3. Job Descriptions

#### 6.3.1. President

The President reports to the Board of Directors and serves to support and conduct administration for the board; informs board members of the current status of the organization, as well as advises members on preferred strategies and resolutions; oversees and manages organization programs and projects. The President will recommend a budget to the board annually and ensuring the staff adheres to the approved budget.

The President will manage and oversee the fundraising for Guided Steps Compassion Center, including planning, strategies and implementation. The President will work directly with the 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.

**Specific responsibilities include:**

#### Leadership & Management

- Ensure ongoing local programmatic excellence, rigorous program evaluation, and consistent quality of finance and administration, fundraising, communications, and

systems; recommend timelines and resources needed to achieve the strategic goals.

- Actively engage and energize Guided Steps' volunteers, board members, event committees, alumni, partnering organizations, and funders.
- Develop, maintain, and support a strong Board of Directors: serve as ex-officio of each committee, seek and build board involvement with strategic direction for both ongoing local operations as well as for the national rollout.
- Lead, coach, develop, and retain Guided Steps' high-performance senior management team.
- Ensure effective systems to track scaling progress, and regularly evaluate program components, so as to measure successes that can be effectively communicated to the board, funders, and other constituents.

#### **Fundraising & Communications**

- Expand local revenue generating and fundraising activities to support existing program operations and regional expansion while simultaneously retiring building debt.
- Deepen and refine all aspects of communications—from web presence to external relations with the goal of creating a stronger brand.
- Use external presence and relationships to garner new opportunities.

#### **Planning & New Business**

- Design the national expansion and complete the strategic business planning process for the program expansion into new markets.
- Begin to build partnerships in new markets, establishing relationships with the funders, and political and community leaders at each expansion site.

#### **Qualifications**

- Bachelor's degree (Masters preferred), or 10 to 15 years related experience and/or training; or equivalent combination of education and experience effectively leading a performance- and outcomes-based organization and staff.
- Excellence in organizational management with the ability to coach staff, manage, and develop high-performance teams, set and achieve strategic objectives, and manage a budget.
- Experienced leader and financial executive with appropriate industry experience.
- Energetic, forward-thinking and creative individual with high ethical standards and an appropriate professional image.
- A strategic visionary with sound technical skills, analytical ability, good judgment and strong operational focus.
- A well-organized and self-directed individual who is "politically savvy" and a team player.
- An intelligent and articulate individual who can relate to people at all levels of an organization and possesses excellent communication skills.
- An excellent negotiator who is experienced in contracts.
- A decisive individual who possesses a "big picture" perspective and is well versed in systems.
- Unwavering commitment to quality programs and data-driven program evaluation
- Strong marketing, public relations, and fundraising experience with the ability to engage a wide range of stakeholders and cultures.
- Strong written and verbal communication skills; a persuasive and passionate communicator with excellent interpersonal and multidisciplinary project skills.
- Action-oriented, entrepreneurial, adaptable, and innovative approach to business planning.
- Ability to work effectively in collaboration with diverse groups of people.
- Passion, idealism, integrity, positive attitude, mission-driven, and self-directed.

### 6.3.2. Vice President of Development and Production

The Vice President of Development and Production reports to the President, 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.

The VP of Development and Production will have 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. The VP will expand and diversify Guided Steps' donor base/pipeline and work closely with other team members to secure funding for new initiatives. In addition, the VP will work closely with the board of directors and support board members as they take on a more active fundraising role.

#### Specific responsibilities include:

##### Fundraising

- Support and partner with the President and board members on all major fundraising initiatives.
- Collaborate with the VP of Finance and Operations to develop and implement Guided Steps Compassion Center's financial strategy.
- Actively work with the President and senior staff to develop and implement a comprehensive development strategy to include corporate, foundation, government grants, etc.
- Oversee research funding sources and trends, with foresight, to help position Guided Steps ahead of major funding changes or trends.
- Monitor all donor information; provide and present statistical analysis to board and senior leaders.
- Monitor and report regularly on the progress of the development program.

##### Product Development

- Overseeing a company's product strategy, based upon goals the President set. The VP of Development and Production has the overall authority over all product development, serving as a product representative, involved in marketing and selling and communicating product benefits to patients and caregivers.
- Responsible for making sure the final product is completely functional and meets customer expectations.

##### Qualifications

- Bachelor's degree required, Master's preferred.
- 10-plus years of professional experience in a nonprofit organization; demonstrated success in a development function (managing and forging relationships with multiple donor sources).
- Tangible experience of having expanded and cultivated existing donor relationships over time.
- Excellent communication skills, both written and oral; ability to influence and engage a wide range of donors and build long-term relationships.
- Strong organizational skills.
- Flexible and adaptable style; a leader who can positively impact both strategic and tactical fundraising initiatives.

- Ability to work both independently without close oversight, but also a team player who will productively engage with others at varying levels of seniority within and outside the organization.
- High energy and passion for Guided Steps Compassion Center's mission is essential.
- Ability to construct, articulate, and implement annual strategic development plan.
- Strong organizational and time management skills with exceptional attention to detail.
- Customer focus.
- Excellent verbal and written communication skills.
- A professional and resourceful style; the ability to work independently and as a team player, to take initiative, and to manage multiple tasks and projects at a time.

#### 6.3.3. Vice President of Finance and Operations

The Vice President of Finance and Operations is responsible for all financial matters of Guided Steps Compassion Center, and reports to and works closely with the President. In addition, the VP of Finance and Operations will partner with the senior leadership and the board of directors to develop and implement strategies across the organization, as well as oversee all compliance and recognition for government (federal and state) contracts and private grants.

##### Specific responsibilities include:

##### Finance

- Oversee cash flow planning and ensure availability of funds as needed.
- Oversee cash, investment, and asset management.
- Oversee financing strategies and activities, as well as banking relationships.
- Develop and utilize forward-looking, predictive models and activity-based financial analyses to provide insight into the organization's operations and business plans.

##### Planning, Policy, and Investor Relations

- Coordinate the development and monitoring of budgets.
- Develop financial business plans and forecasts.
- Participate in corporate policy development as a member of the senior management team.
- Engage the finance committee of the board of directors to develop short-, medium-, and long-term financial plans and projections.
- Represent the company to financial partners, including financial institutions, investors, foundation executives, auditors, public officials, etc.
- Remain up to date on nonprofit audit best practices and state and federal law regarding nonprofit operations.

##### Accounting and Administration

- Oversee the accounting department to ensure proper maintenance of all accounting systems and function.
- Ensure maintenance of appropriate internal controls and financial procedures.
- Ensure timeliness, accuracy, and usefulness of financial and management reporting for federal and state funders, foundations, and Guided Steps Compassion Center's board of directors; oversee the preparation and communication of monthly and annual financial statements.
- Coordinate audits and proper filing of tax returns.
- Ensure legal and regulatory compliance regarding all financial functions.

##### Qualifications

- Bachelor's degree (MA/MBA preferred) in Business, Management, or Finance.

- At least 10+ years of experience, with at least five years managing the finance and administration of a \$5 million to \$10 million organization or business unit.
- Excellent people skills, with experience collaborating in a multi-disciplinary, diverse, and dynamic team.
- Demonstrated experience in financial management and accounting.
- Experience in legal, audit, compliance, budget, and resource development.
- Demonstrated resourcefulness in setting priorities, proposing new ways of creating efficiencies, and guiding investment in people and systems.
- Technologically savvy, with an ability to point to examples of having worked with IT staff to develop and implement new processes and systems that increased efficiency in a fast-moving environment.
- Flexible and a self-starter, able to multi-task while also being highly detail-oriented.
- Energetic, flexible, collaborative, and proactive; a team leader who can positively and productively impact both strategic and tactical finance and administration initiatives.
- Excellence in organizational management with the ability to coach a senior-level staff to manage and develop high-performance teams and develop and implement program strategies.
- Personal qualities of integrity, credibility, and a commitment to Guided Steps Compassion Center's mission.

#### 6.3.4. Security Manager

The Security manager maintains a safe and secure environment for patients, caregivers, volunteers, visitors and personnel by establishing and enforcing security policies and procedures such as patrolling building perimeter, setting up a secure point of entry, and investigating suspicious activity, and supervising the security guard force.

##### Specific responsibilities include:

- Protect a Guided Steps Compassion Center's patients, caregivers, volunteers, visitors and personnel from invasion and harm.
- Perform services to assure the safety and protection of Guided Steps Compassion Center's property and personnel against injury or death, molestation, harassment or intimidation and loss or damage from any preventable cause including fire, theft, embezzlement, damage or destruction, trespass, espionage, or sabotage.
- Maintain and update a property loss and prevention program.
- Evaluate incidents and determine course of action.
- Discover source of security breach.
- Report and track all incidents.
- Maintain an emergency training curriculum.
- Patrol building and ward off intruders.
- Supervise parking procedures.
- Supply security for events.
- Monitor and support security-related processing for cleared staff.
- Institute and oversee site key and safe combination management plans.
- Prepare and conduct information security training.
- Develop physical security responses.
- Manage processes for protecting classified, proprietary, and sensitive information.

##### Qualifications

- High School Diploma and a Bachelor's or Associate's Degree in Criminal Justice, Public Administration, Business, or related subjects or equivalent work experience required.
- Minimum of 5 years management experience with direct supervision of multiple suppliers/staff members.

- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Ability to define issues, appraise situations, analyze problems, evaluate alternatives and develop sound, constructive, expert conclusions, recommendations and decisions.
- Ability to respond calmly and effectively in emergency situations.

#### **Investigation of Fitness**

A character investigation may be conducted on applicants selected for employment. The purpose of such an investigation is to secure evidence of the candidate's honesty, integrity, general character, and loyalty.

#### **Medical Requirements**

The duties of this position require moderate to arduous physical exertion and/or duties of a hazardous nature. The following medical requirements apply to all security applicants:

- Good near and distant vision.
- Ability to distinguish basic colors.
- Ability to hear the conversational voice.

#### **6.3.5. Security Guard**

The Security Guard(s) are responsible for patrolling the Guided Steps Compassion Center premises to detect suspicious activity, assist and ensure safety of patients, caregivers, volunteers, visitors and personnel.

#### **Specific responsibilities include:**

- Protect property and lives by patrolling the area.
- Monitor entrance of property through surveillance.
- Identify patients, caregivers, volunteers, visitors and employees and ask for appropriate documents.
- Guard against theft and maintain security.
- Respond to alarms and calls of distress.
- Stop suspicious people and ask for identification.
- Investigate thefts and file police reports.
- Call for aid if necessary.
- Use walkie-talkies, pagers, and cell phones to stay in contact with security personnel.
- Answer telephone calls to take messages, answer questions, and provide information during non-business hours or when switchboard is closed.
- Report rule infractions and violations.
- Issue tickets and citations.
- Apprehend criminals and evict violators.
- Prevent passage of prohibited articles into restricted areas.
- Check purses, pockets, and bags for suspicious items.
- Remove weapons and stow away for later retrieval.
- Inspect and adjust security systems, equipment, and machinery to ensure operational use and to detect evidence of tampering.
- Regulate and monitor building systems.
- Inspect windows and doors to ensure locks are in place and working.

#### **Qualifications**

- Must have a high school diploma/GED and be capable of communicating effectively and coherently over radio channels while initiating and responding to radio communications.

- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Must be able to engage in security functions that include such things as working various shifts, walking on foot patrol, climbing stairs and physically checking the doors and windows of buildings to ensure that they are secure.
- Must be able to prepare reports using appropriate grammar and mathematical computations.
- Must be able to communicate with sensitivity and tact and maintain confidentiality.
- Must have strong interpersonal and communication skills with the ability to develop and maintain mutually cooperative relationships with a diverse population of patients, caregivers, volunteers, visitors and personnel.

#### Investigation of Fitness

A character investigation may be conducted on applicants selected for employment. The purpose of such an investigation is to secure evidence of the candidate's honesty, integrity, general character, and loyalty.

#### Medical Requirements

The duties of this position require moderate to arduous physical exertion and/or duties of a hazardous nature. The following medical requirements apply to all security applicants:

- Good near and distant vision.
- Ability to distinguish basic colors.
- Ability to hear the conversational voice.

#### 6.3.6. Patient Intake Coordinator

The Patient Intake Coordinator will process paperwork for the Guided Steps' new medical marijuana patient.

##### Specific responsibilities include:

- Conduct initial interviews with patients
- Creating physical and/or electronic files for tracking patient relationship and verify the patient's medical marijuana recommendation is valid and current with medical offices.
- Working with the Office Manager as a part of the business's front end management team.
- Ensure all new patients are processed into the business accurately and patients are educated on dispensary – patient relationship policies and procedures.

##### Qualifications

- High School Diploma or equivalent.
- Three years' experience working in a healthcare environment, preferably in health information management or medical records.
- Knowledge of quality and business or office management preferred.
- Ability to apply problem solving techniques to assess and interpret medical records to a degree that would support independent work and possess excellent communication skills.
- Good customer service skills.
- Ability to handle stressful and emotional situations in relationship to patients in acute distress, physicians, or families of dying patients.
- Ability to work without close supervision and to exercise independent judgment.
- Ability to set priorities, coordinate multiple tasks, organize tasks, maintain workflow, and prepare complex written materials.
- Knowledge of Delaware's Medical Marijuana Program requirements and guidelines.

- Ability to utilize resources in an organized and efficient manner
- Exceptional communication skills, both verbally and written.
- Proficiency in database management and word processing.

#### 6.3.7.Receptionist

The Receptionist will be responsible for fielding incoming calls and relaying messages, providing information to callers and patients about Guided Steps Compassion Center outside of normal inquiries regarding patient processing.

##### Specific responsibilities include:

- Welcoming patients, caregivers, volunteers, and visitors by greeting them, in person or on the telephone; answering or referring inquiries.
- Directing patients, caregivers, volunteers, and visitors by maintaining employee and department directories; giving instructions.
- Maintaining security by following procedures; monitoring logbook; issuing visitor badges.
- Maintaining safe and clean reception area by complying with procedures, rules, and regulations.
- Maintaining continuity among work teams by documenting and communicating actions, irregularities, and continuing needs.
- Contributing to team effort by accomplishing related results as needed.

##### Qualifications

- Excellent interpersonal skills.
- Able to communicate effectively with a variety of people.
- Able to work independently or as part of a team.
- Previous experience in a general practice environment.
- Proficiency in Windows operating system.

#### 6.3.8.Master Grower

The Master Grower is responsible for all aspects of production for Guided Steps Compassion Center.

##### Specific responsibilities include:

- Create and implement production schedule for continual, ongoing harvests.
- Select varieties and acquire genetics from seeds or rooted cuttings.
- Manage all phases of plant growth (stock plants, propagation, training and flowering).
- Select, mix and apply appropriate plant nutrients.
- Troubleshoot and correct nutrient deficiencies or toxicities in plants.
- Monitor water quality and nutrient levels for all irrigations and fertigations.
- Design and execute Integrated Pest Management program to keep insects under control.
- Manage environmental growing conditions in person and remotely from computer.
- Train and schedule daily work assignments for assistant growers.
- Coordinate harvest and post-harvest production (trimming, drying, curing, and packaging).
- Perform preventive maintenance and basic repair of growing equipment.
- Perform regular calibration of nutrient testing instruments.
- Ensure cleanliness of facility at all times.
- Keep daily records for production accuracy and compliance with all laws.
- Budget, cost, and perform general administrative duties.
- Purchase materials as needed.

- Attend trade shows, educational seminars, and industry events to stay current on best practices.
- Spearhead R&D activities to test new equipment, varieties, and growing techniques.
- Develop and implement processes to ensure the security of the grow facility and its employees.
- Comply with all state and federal regulations, audits and inspections of grow facility.

**Qualifications**

- Knowledge of large scale commercial plant cultivation including nutrient requirements, mediums, light requirements, temperature control, air flow, etc.
- Knowledge of plant diseases, insects and fungi, as well as plant treatment options.
- Physical aptitude and health necessary to perform manual labor tasks required for the proper management of grow warehouse.
- Advanced knowledge of the cannabis plant and genetics.
- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Must have accountability, proactive behavior and strong attention to detail.
- Lifting up to 50 lbs. and ability to work in an industrial setting with noise and high light.

**6.3.9. Assistant Grower**

The Assistant Grower will be responsible for all activities in designated grow room, working closely with the Master Grower.

**Specific responsibilities include:**

- Determining nutrient and watering/moisture requirements
- Controlling pests by implementing Integrated Pest Management (IPM).
- Controlling environmental conditions by regulating humidity, ventilation, and temperature.
- Communicating cultural or plant issues to management immediately.
- Troubleshooting crop issues and diagnosis of unknown health or damage problems.
- Maintaining records of crop activities and observations, including pesticide applications and growth records.
- Following growing schedules by determining schedules with Master Grower.
- Troubleshooting grow room mechanical/environmental control systems.
- Performing other duties as assigned.

**Qualifications**

- Excellent work ethic and demonstrated ability to learn new skills quickly
- Attention to detail
- Timeliness
- Cleanliness
- Honesty
- Ability to wear many hats during start-up phase of the compassion center.
- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Lifting up to 50 lbs. and ability to work in an industrial setting with noise and high light.

#### 6.3.10. Dispensary Manager

The Dispensary Manager is the face of the dispensary. The manager must interface with the ownership, staff, law enforcement, vendors and landlords. The main responsibility of the dispensary manager is to coordinate and facilitate the transactions of the dispensary. He or she must maintain records, maintain contact with the dispensary grow site as well as other grow site, embrace patient education and understand marketing. He/she must train employees and decide which products to carry and determine the best pricing based on market conditions. He/she is responsible for keeping up with all the changes in local and state law regarding operation of the facility. Often, if a dispensary is raided or if an unexpected visit is made, the manager will be the one that will have to answer questions during an investigation. The most important job of the dispensary manager is to ensure that only the best and safest quality medicine is available at the dispensary.

##### Specific responsibilities include:

- To oversee and be responsible for all medicine dispensed, ensuring accuracy in labelling of medicine name, strength, quantity and direction for use.
- To assume financial control and responsibility for the dispensary's efficiency.
- To provide supervisory assistance for all dispensary staff members.
- To adhere to the strictest confidentiality when handling medical records and other information pertaining to patients and staff.
- Regularly checking the market for fluctuations in price, as well as the research for new or discontinued strains, products, etc.
- Following up changes to product prices, categories and availability with supplier representatives.
- Maintaining a computerized directory for all new strains and for monitoring repeat prescriptions.
- Maintaining stock levels within the dispensary and reordering when necessary.
- Checking inventory for expiry dates, as well maintaining adequate stock control and rotation with suppliers and/or internal grow facility.
- Performing monthly, quarterly and annual sales reviews and provide suggestions for improvement to Executive Management.
- Overseeing accuracy and efficiency of dispensing staff.
- Handling returned medication from patients.
- Disposing of returned medication according to Guided Steps Compassion Center's disposal policy.

##### Qualifications

- Strong leadership and management abilities.
- Excellent organizational skills.
- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Knowledge of Guided Steps Compassion Center's products, medical marijuana strains, treatments, and side effects.
- Excellent verbal and written communication skills.
- High level of proficiency in Microsoft Office Suite, particularly Excel.
- Able to interact with executives and provide meaningful input in business meetings.
- Strong business and math skills in order to understand basic financial forms and analytical reports.
- Outgoing and personable.

**6.3.11. Budtender**

The Budtender will assist medical marijuana patients to find the best cannabinoid therapy for their ailments.

**Specific responsibilities include:**

- Weighing and packaging medical cannabis for patient orders.
- Consult with patients.
- Verify medical recommendations.
- Cash register management.
- Perform front end office administrative duties and patient record keeping.
- Maintaining a running knowledge of all new smoking accessories, reasons for using each one and technical knowledge of each product for demonstration purposes.

**Qualifications**

- Excellent customer service skills.
- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Knowledge of Guided Steps Compassion Center's products, medical marijuana strains, treatments, and side effects.
- Computer literate.

**6.3.12. Cashier**

The Cashier will assist medical marijuana patients complete their purchase transactions.

**Specific responsibilities include:**

- Receive payment by cash, check, credit cards, vouchers, or automatic debits.
- Issue receipts, refunds, credits, or change due to customers.
- Count money in cash drawers at the beginning of shifts to ensure that amounts are correct and that there is adequate change.
- Greet customers in a friendly professional manner.
- Maintain clean and orderly checkout areas.

**Qualifications**

- Experience in a retail environment either in cashier or sales.
- A commitment to service, excellence and customer satisfaction.
- Ability to process information and/or merchandise through electronic cash register system.
- Ability to communicate with associates and customers.
- Exceptional organizational ability, high attention to detail, and ability to multi-task.

**6.3.13. Courier Delivery Driver**

The Courier Delivery Driver is responsible for transporting patient orders securely and safely.

**Specific duties include:**

- Perform deliveries in a polite and professional manner.
- Ensure documents are delivered and entered accurately.
- Communicate with office security through a mobile device.
- Maintain route supply inventory to ensure prompt delivery of products to patients.
- Maintain delivery records.

**Qualifications**

- Must possess a valid Delaware driver's license and a good driving record.

- Knowledge and understanding of Delaware's Medical Marijuana Program, laws, regulations, and guidelines.
- Must have previous work experience as a courier delivery driver.
- Must have a clean criminal history without felonies and/or misdemeanors within the last 5 years.
- Have a geographical knowledge of the state of Delaware.
- Ability to work well under pressure or in stressful situations.
- Must be well organized and detail oriented.
- Must possess excellent time management skills.

#### 7. Orientation and Training

Guided Steps understands that a critical factor in the success of the center is the dedication, knowledge, and compassionate care of its employees all working together with a common purpose. Guided Steps has utilized the exemplary and broad experience of its officers and executive managers to develop a training program designed to test and cultivate unique skills and knowledge desired by Guided Steps in its team members.

Designed Guided Steps' employees are required to attend the following mandatory series of in-house training modules:

##### Module 1

This module covers the State of Delaware and Federal laws and regulations governing medical marijuana. *[Required attendees: All employees.]*

##### Module 2

This module covers the review of Guided Steps' Operations Manual and Standard Operating Procedures (SOPs). *[Required attendees: All employees.]*

##### Module 3

This module covers the review of Guided Steps' safety and security procedures. *[Required attendees: Executive Management; Security Team]*

##### Module 4

This module covers the review of Guided Steps' disaster preparedness. *[Required attendees: All employees.]*

##### Module 5

This module covers patient registration, confidentiality and privacy; HIPPA, and electronic recordkeeping. *[Required attendees: All employees.]*

##### Module 6

This module covers the procedures for the dispensary retail area and Compassionate Courier Service. *[Required attendees: Executive Management; Dispensary staff.]*

##### Module 7

This module covers the procedures for the growing, cultivation, inventory management, quality control, and medical cannabis testing. *[Required attendees: Executive Management; Cultivation staff.]*

Personnel records will be reviewed at orientation and annually to ensure the required training requirements are met and enforced.

Each employee, agent, and volunteer shall also receive additional training as follows:

- Professional conduct, ethics, state and federal laws regarding patient confidentiality;
- Informational developments in the field of medical marijuana usage;
- Proper use of security measures and controls;

- Specific procedural instructions for responding to an emergency, including robbery or a violent accident.

## 8. Employee Program

### 8.1. Employee Handbook and Benefits

Guided Steps has developed a comprehensive Employee Handbook, which employees are provided at the time of hire and are encouraged to read it thoroughly. Any questions or comments regarding the policies set forth in the Employee Handbook shall first be addressed with the employee's supervisor. If the supervisor is unable to assist, the employee should contact Guided Steps' Human Resources Manager.

Guided Steps has an 'open door' policy regarding employment issues that are important to employees. Any employee may present questions and/or comments in writing, and will receive a written response within 3 business days.

As Guided Steps believes in open dialogue between employees and managers, an employee need not fear or feel disadvantaged as a result of raising questions about potentially unclear policies, or making constructive comments and criticisms.

### 8.2. Privacy and Confidentiality

Over the years, a number of legislative acts, at both federal and state level, have established strict rules for maintaining the confidentiality of an individual's medical information and medical history. Of particular note are the following:

- Delaware's Title 16 Health and Safety Regulatory Provisions Concerning Public Health (Chapter 20. Uniform Health Data)
  - <http://delcode.delaware.gov/title16/c020/index.shtml>
- Federal Health Insurance Portability and Accountability Act of 1996 (HIPPA)
- Health Information Technology for Economic and Clinical Health Act of 2009 (HITECH)

Compliance with HIPPA and related privacy laws, rules, and regulations is a priority of Guided Steps; therefore, the Center will diligently works towards having its employees fully understand these important patient rights as well as each employee's critical role in safeguarding them.

### 8.3. Commitment to Employees

Guided Steps employees are selectively recruited, in large part, based upon their enthusiastic commitment to working in the Center's challenging and rewarding environment. Guided Steps recognizes its team members' intellect, spirit, and compassion as these individuals are what makes the Center special, and most importantly, they contribute to the relief and comfort of patients during their experience at the compassion center.

Guided Steps is committed to the advancement and intellectual enrichment of its team members. No employee shall hesitate to discuss, with his or her manager, any educational or training opportunities for his or her professional development. Guided Steps is developing an employee-tuition program (i.e. Cannabis Education) to assist team members, and invites recommendations as this program is developed and implemented.

## 9. Volunteer Opportunities

Guided Steps encourages the participation of volunteers interested in assisting with its activities. Volunteers must be 21 years of age or older, and must possess a valid Registry Identification Card. Those who do not possess a valid Registry Identification Card will be prohibited from working at the Center.

Prospective volunteers will be apprised of options for volunteering with community-based non-profit health and support organizations.

All volunteer applications are required to submit a completed Volunteer Application and Agreement. Every application and agreement will be fairly evaluated based on standard criteria, and each volunteer will be notified of Guided Steps' approval or decline. Volunteers will not be considered employees of Guided Steps; however, all applicable rights of volunteers under law shall be respected and upheld. Guided Steps' VP of Finance and Operations will administer the Center's volunteer program.

## 10. Operations Procedures

Guided Steps has entered into a lease for approximately 5,000 square feet of very suitable space for the compassion center.

The open, planned space is located at 73 Artisan Drive, Smyrna, Delaware 19977 in a modern, well-maintained, and conveniently located building. Preliminary architectural proposals are being finalized; installation of security features, final layout, and interior design has been planned.

While developing the operations procedures for the compassion center, Guided Steps has relied upon not only its own research and visits to medical marijuana compassion centers in other states, but also on the knowledge and experience of experts and consultants in the field. The following sections describe how Guided Steps' operations of its compassion center will meet the requirements of DHSS, as well as the Center's employees and member patients.

### 10.1. Management Oversight

Strong, consistent management oversight is a critical element in the execution of Guided Steps' plan for its compassion center. The Center intends to ensure management oversight through the use of two traditional methods: reports and meetings.

#### 10.1.1. Reports

Beginning on the issuance date of Guided Steps' registration certificate, internal reports will be prepared as indicated below and subject to change at the discretion of the Board of Directors. Guided Steps' expects that the reporting frequency indicated below may potentially decrease after 6 to 12 months of operation.

##### 10.1.1.1. President's Report to Team Members

Each Wednesday by 12:00pm, Guided Steps' President will distribute his or her report to the entire team. This report will generally take the form of a narrative newsletter, highlighting 2 or 3 items of general interest that occurred in the week just ending, and 2 or 3 items of notable interest in the coming week(s).

##### 10.1.1.2. President's Report to Board of Directors

Each Wednesday by 12:00pm, Guided Steps' President will deliver his or her report to the Board of Director's members, including information and discussion of strategic issues, critical financial or regulatory events, and subjects which the members may wish to take up for deliberation during the next scheduled Board of Directors meeting. The President's report will also include, as attachments, all documents required for understanding and deliberation of applicable information.

##### 10.1.1.3. Treasurer's Report to President

Each Tuesday by 12:00pm, each of Guided Steps' Executive Managers will deliver a separate, brief summary report to the President, advising the status of events occurring during the previous week in their area of responsibility, and a review of the current week's action items.

##### 10.1.1.4. Office Managers' Report

Each Monday by 12:00pm, the Office Manager will deliver a separate, brief summary report to the VP of Finance and Operations, advising the status of events occurring during the previous week and reviewing the current week's action items.

#### 10.1.1.5. Other Reports

Each Executive Manager may decide to request team members under their supervision to make daily entries, however brief, into logs or diaries maintained in open form in their work areas. These information records, sometimes referred to as "Shift Reports," are intended to capture items of interest or concern which occurred during the employees working shift, for the benefit of fellow workers and management.

#### 10.1.2. Meetings

Guided Steps' understands that meetings can offer valuable brainstorming and information sessions, in addition to boosting morale and creating an atmosphere of inclusion. As such, in an effort to foster communication and team morale, certain regular meetings will occur in the short-term and adjusted for in the future.

##### 10.1.2.1. All Hands Meetings

During its first week of operation, and monthly thereafter, Guided Steps' will hold mandatory "All Hands" meetings for all team members. The moderators for these meetings will be the Executive Management team.

Topics for the meetings will be announced in advance, and a period of time will be reserved for open discussion and questions. These meetings are intended to accomplish the following goals:

- Acquaint team members with other team members with whom they may not often directly communicate or interact with;
- Create an opportunity for spirited, informational, and educational discussions;
- Improve working relationships throughout the organization.

##### 10.1.2.2. Management Meetings

At the discretion of Guided Steps' Executive Managers and other Managers, regular meetings will be held to facilitate the dissemination of policy updates, to gain feedback and suggestions from team members, as well as to encourage communication and cooperation within the organization's working groups.

#### 10.2. Patient/Caregiver Services

This section of the Operations Manual describes the typical patient/caregiver experience when interacting with personnel and agents of Guided Steps.

**NOTE: Patients and caregivers coming to Guided Steps will be on an appointment only basis.**

##### 10.2.1. Patient Registration

Patients will be allowed to make a registration appointment with Guided Steps Compassion Center one (1) to two (2) months prior to the official opening. The patient will be asked if he or she is able or unable to physically come to the facility. Patients unable to physically come to the facility due to being bedridden or disabled will have two (2) options for registration:

- a) Registration of Homebound Patient with a Caregiver
- b) Registration of Homebound Patient Without a Caregiver

##### 10.2.2. Registration of Homebound Patient with a Caregiver

The steps below will be followed for bedridden or disabled patients who have a caregiver:

1. Patient Intake Coordinator will ask the patient or caregiver to provide his/her State of Delaware license or State ID number, which will be entered into the patient management system in order to verify patient/caregiver status and the confirm patient/caregiver relationship.

- a. If unable to verify or confirm status and/or relationship, Patient Intake Coordinator will provide instructions for patient and caregiver registration with the DHSS Medical Marijuana Program.
2. Once the patient/caregiver information has been verified and the relationship has been confirmed, Patient Intake Coordinator will complete the Patient/Caregiver Registration Form while on the call.
3. Appointment will be scheduled with the caregiver.
4. Caregiver will be instructed on what supporting documentation to bring to the appointment, and directions to the center.

#### 10.2.3. Registration of Homebound Patient WITHOUT a Caregiver

The steps below will be followed for bedridden or disabled patients who DO NOT have a caregiver:

1. If a patient does not have a caregiver, the Patient Intake Coordinator will offer the Compassionate Courier Service.
2. Patient will be advised the registration visit will be conducted at his/her home, and will be instructed to fax or email the following information prior to the home appointment:
  - a. Copy of State of Delaware License or State ID
  - b. DHSS Registry ID Card Number
  - c. Doctor referral letter
3. Patient Intake Coordinator will verify patient's information.
  - a. If patient's information is unable to be verified, Patient Intake Coordinator will provide instructions for patient and caregiver registration with the DHSS Medical Marijuana Program.
4. Upon verification of patient's information, Patient Intake Coordinator will offer the option of sending the Patient/Caregiver Registration Form via email or completing the form while on the call.
  - a. If patient opts for email, Patient Intake Coordinator will email the PDF fillable form for patient to complete and return or give to the Compassionate Courier at the appointment.
  - b. If patient opts for form to be completed during the call, the Patient Intake Coordinator will obtain all required information.
5. Once all patient information has been obtained, appointment will be scheduled.
6. Patient will be provided details regarding the Compassionate Courier Service procedures.
7. At the appointment, a Compassionate Courier will collect patient's information and give him/her a Guided Steps Compassion Center Welcome Packet.
8. Upon returning to the facility, the Compassionate Courier will give the patient's information to the Patient Intake Coordinator.
9. Patient Intake Coordinator will again verify patient's information.
10. Upon verification, the patient will be contacted to proceed with ordering and dispensation of medication.
  - a. At that time, patient will be provided the option of placing order online or over the phone.
11. After patient's order is placed, the Compassionate Courier Service will be utilized for delivering medication (*reference SOP 111: Compassionate Courier Service*).

#### 10.2.4. On-Site Appointments

##### 10.2.4.1. Security

Upon arriving at Guided Steps Compassion Center, patients and caregivers must present his or her valid Registry Identification Card to the Security Guard. After verifying identity, the Security Guard will permit patient or caregiver access to the Reception Area.

#### 10.2.4.2. Reception

Guided Steps Compassion Center will have at least one (1) Reception stationed in the reception area to greet patients and/or other guests. Such person will be seated at a desk with either a privacy screen or enough distance to allow comfort and/or privacy for the patients, guests, and/or visitors in their communication with the Receptionist.

The Receptionist will check the patient/caregiver into the patient management queue, and instruct him/her to wait in the reception area.

Based on appointment, patient or caregiver will be greeted by a Patient Intake Coordinator (new visit) or Budtender (returning visit).

#### 10.2.4.3. Intake Process

Newly registered qualifying patients and their registered primary caregivers must initially participate in Guided Steps' "Intake Process," which will include:

1. Meeting with a Patient Intake Coordinator to formerly register with the Center;
  - a. Patient Intake Coordinator will describe all services and products available to patient members;
  - b. Complete the Patient/Caregiver Registration Form (*unless completed during an initial call*).
2. Receiving a "Welcome Packet," which will be reviewed with patient and will include the following Guided Steps Compassion Center information:
  - a. Welcome Letter
  - b. Hold Harmless Clause
  - c. Patient/Caregiver Code of Conduct Agreement
  - d. Guided Steps Compassion Center Member Discounts and Services
  - e. The Delaware Medical Marijuana Act
  - f. State of Delaware Medical Marijuana Code
  - g. List of Frequently Asked Questions (*designed by State of Delaware DHSS*)
  - h. Federal Government Marijuana Enforcement Policy
  - i. Guided Steps Compassion Center Medical Cannabis/Treatment List
  - j. Ways to Consume Medical Marijuana
  - k. The Human Endocannabinoid System
  - l. Know Your Medicine – Ailments and Corresponding Cannabis
  - m. Traveling with Medical Marijuana
  - n. Guided Steps Compassion Center Medical Cannabis/Conditions
  - o. Guided Steps Compassion Center Emergency Contact List

The Intake Process will provide patients and caregivers with a comprehensive understanding of Guided Steps' rules, special discount programs and library resources; various methods of medical cannabis administration; related side effects; safe smoking of medical marijuana; information comparing and contrasting Indica versus Sativa; and recent scientific literature on clinical applications and health effects of medical marijuana.

#### 10.2.4.4. Dispensing Retail Area

A Budtender will greet the patient or caregiver in the reception area and escort him/her to the Dispensing Retail area. Before proceeding with any dispensation, the Budtender will, via the patient management system:

1. Evaluate whether the patient is in good standing (i.e. he or she has not violated any of the Center's policies and procedures), and
2. Ascertain the amount of medical marijuana which is available to the patient based upon the allowable limits permitted under the laws, rules, and regulations of the State of Delaware.

3. Upon all information checking out, Budtender will proceed with assisting the patient or caregiver with his or her medical cannabis transaction.

Prior to checking-out with the Cashier, patients and caregivers will be permitted to peruse the paraphernalia and/or accessories sections. In addition to medical marijuana products, other items will be available for purchase, which will aid patients and caregivers in safely and conveniently storing and/or using the medicine obtained from Guided Steps. These products will include, among other things:

- a. Lockboxes and child-proof storage containers (for extra safety when storing medical marijuana in a refrigerator or other area where minors may be present);
- b. Vaporizers and other inhalation supplies;
- c. Tinctures (Sativa or Indica in alcohol and glycerin base; whole herb extract tinctures with various sweeteners); and
- d. Topical creams, lotions, oils, bath salts, and soaps
- e. Reference and informational materials such as books, magazines, and DVDs

**NOTE:** All medical cannabis product labeling will include "FOR MEDICAL USE ONLY, NOT FOR RESALE" and "KEEP AWAY FROM CHILDREN." Tinctures will also be labeled per the regulations of The Dietary Supplements Health and Education Act of 1994 (DSHEA) (<http://www.fda.gov/Food/DietarySupplements/default.htm>).

#### 10.2.4.5. Check Out

Once a patient has selected the type and amount of medical marijuana for purchase, and the Dispensing staff has verified the amount is within the allowable parameters for the patient at that time, the Patient Management/POS software will again be utilized to record the of the medical marijuana purchase (strain, batch, quantity, date), and calculate the price. The system will generate a label displaying the recorded information, which will then be affixed to the medicine container, and the patient pays for the medicine via donations.

#### 10.2.5. Return Policy

Guided Steps Compassion Center offers a 3 day no questions asked return policy. If for ANY reason a patient or caregiver is dissatisfied with a product(s) processed by Guided Steps for whatever reason, the product(s) may be exchanged or returned for a full refund.

#### 10.2.6. Compassionate Courier Service

Patients able to administer their own medication, not requiring a designated caregiver for assistance, and have no transportation to the facility to obtain their medication will have the option of calling in their order or ordering online for their medication to be transported securely and safely to their residence. (Please see SOP 112: *Compassionate Courier Service*.)

#### 10.2.7. Sliding Scale Donations

Guided Steps Compassion offers a Sliding Donation Scale for patients who are unable to afford donations due to low income, enrolled in Medicaid or receiving Supplemental Security Income or Social Security Disability Insurance. This Sliding Donation Scale will be based on the Federal Department of Health and Human Services 2014 Annual Update of the HHS Poverty Guidelines (Federal Register, Vol. 79, No. 14, Wednesday, January 22, 2014, Notices, Pages 3593 and 3594).

#### 10.2.8. Compassionate Care Discounts

Guided Steps is 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 is very liberally applied, and 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.

Currently, Guided Steps Compassion Center discounts are 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 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. **Compassionate Care Jar 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. **General Discounts**
  - i. 20% Senior Citizen Discount (65 years of age or older); and
  - ii. Member patients who cannot afford medication (based on total income below 200% of the Federal Poverty Level Guidelines).
- g. **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.

## 11. Operations Procedures – Cultivation Center

### 11.1. Management and Staff Roster

Staff positions of the Cultivation Center and the anticipated number of positions of each position are described below:

1. Master Grower (1)
2. Assistant Grower (1)

## 11.2. Daily Operations

### 11.2.1 Opening Procedures

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



### 11.2.2 Closing Procedures

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



### 11.3. Operating Procedures per Growth Stage

Master Grower will provide and oversee the implementation of proprietary techniques and processes (including nutrient/feeding mixtures and schedules, as well as other formulae, regimens, and schedules) to be followed by the Growers with respect to each growth stage, including without limitation:

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



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



11.4. Pest Management

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



11.5. Harvesting

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



11.6. Daily Maintenance and Inspections

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



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

### 11.7. Record Retention

Master Grower, with respect to each respective grow cycle and harvest, will oversee and maintain record retention on the following:

- a. Labeling, numbering, and weights;
- b. Pre and post readings on PPM and pH;
- c. Temperatures, humidity, CO2, and nutrient regimens.

### 12. Inventory Controls

#### 12.1. Inventory Management

In conjunction with Guided Steps' Patient Management/POS software (MJ Freeway), internal inventory and security procedures, inventory of Guided Steps' medical marijuana will be tracked with the highest degree of accuracy. Inventory check and cross-checks will be performed in accordance with the laws, rules, and regulations of the State of Delaware and also with the procedures set forth in Guided Steps' Safety and Security Plan.

#### 12.2. Delaware Law and Security

On a weekly basis, Guided Steps' Security Manager and VP of Production and Development and/or VP of Finance and Operations will:

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

#### 12.3. Inventory Control Steps

Guided Steps will adhere to the following inventory control steps:

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

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



### 13. Storage of Usable Medical Marijuana

All harvested medical marijuana will be placed and remain in a fire/theft proof vault until dispensed to patients

### 14. Operations Procedures – Dispensary Retail Center

#### 14.1. Management and Staff Roster

Staff positions of the Dispensary Retail Center and the anticipated number of positions of each person are described below:

1. Dispensary Manager (1)
2. Budtender (2)
3. Cashier (1)
4. Courier Delivery Driver (3)

#### 14.2. Dispensary Opening Procedure

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



#### 14.3. Dispensary Closing Procedure

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



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

### 15. Transportation

With respect to all operational matters relating to the transportation of medical marijuana, please refer to the following SOPs:

- SOP 102: Safety and Security
- SOP 111: Compassionate Courier Service

### 16. Evacuation Plan

The Guided Steps' Emergency Evacuation Plan, in addition to the emergency notification and other procedures set forth in the Safety and Security Plan, applies to all emergencies including but not limited to fire, explosion, spill, and chemical releases, where all employees may need to evacuate for personal safety (*please see SOP 112: Business Continuity/Disaster Recovery Plan for further details*).

Guided Steps conducts quarterly mock disaster recovery, business continuity, and security scenarios to ensure adequate preparation in the event of an emergency situation.

### 17. Information Technology

Guided Steps uses MJ Freeway software and hardware systems for the following:

- Patient/Caregiver Database Management
- Inventory Management
- Grow Tracker
- Bar Coding
- Labeling
- Point-of-Sale Services

### 18. Outreach Activities

#### 18.1. Educational Programs

Guided Steps offers the following programs to patients and caregivers for free or nominal fee:

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

#### 18.2. Events and Workshops

A calendar of events and workshops integrating all aspects of well-being will be posted and updated in the Center. These workshops will include, but are not limited to:

1. **Medical Marijuana 101** for all new patients of Guided Steps Compassion Center. This program will educate new patients on the different medical marijuana strains, associated treatments, potential side effects, different methods of usage and associated paraphernalia, and the human Endocannabinoid system.
2. **Senior Support Program** specifically for seniors who are new to medical cannabis and have family who are not supportive of it. The goal will be 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*).
3. **Patient Group Support Program** for patients who do not have the support of their family for the use of medical cannabis. The goal will be 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.

4. **Patient Substance Abuse Support Program** for patients who feel comfortable to discuss and face their addictions. The goal for this program will be to discuss ways the use of medical cannabis, positive surroundings, and positive thinking can help one overcome addictions (*conducted by experienced and licensed counselor*).
5. Seminars featuring legal experts in the continuously developing field and changing medical marijuana industry.
6. Scheduled discussions by physicians, pharmacists, nurses, and other medical practitioners and healthcare providers.

#### 18.3. Pain Management and Wellness Services

A Pain Management and Wellness Community Calendar will also be posted, including without limitation, events and services (provided at no charge or a nominal fee) at the compassion center affiliated with pain management and wellness in general. These services include, but are not limited to:

- Chiropractic Services
- Massage Therapy
- Acupuncture
- Reflexology
- Counseling
- Reiki
- Jin Shin Jyutsu
- Health Coach

#### 18.4. Referrals

Guided Steps will make all member patients aware of the potential services available by therapists and other free or discounted consultations and services.

#### 18.5. Guided Steps Reference Library and Website

Guided Steps maintains a reference library in a very relaxing setting, as well as an interactive website. Guided Steps is committed to keeping its patients and staff informed and educated through providing an extensive reference library that covers the following topics:

- > Current research on medical marijuana;
- > Legal aspects on medical marijuana;
- > Booklets detailing specific conditions treated by cannabis; and
- > Reference materials on integrative medicine.

#### 19. Summary of Overall Goal

Guided Steps' overall goal is to provide an integrative approach to wellness whereby once our medical marijuana specialists have consulted with and assisted patients in choosing the best suited form and type of cannabis in an educated and responsible manner, then such specialists can help patients become aware of other health and wellness services, products, and/or educational opportunities in which they may benefit from in their journey to overall wellness.

#### 20. Operation Manual Updates

As directed from time to time by Guided Steps' President, this Operations Manual will be revised as a result of comments, feedback, and/or recommendations from personnel, volunteers, patients and caregivers. Revisions must be presented to and approved by the Board of Directors. Upon approval, updates will be finalized then communicated effectively to appropriate personnel, with hard copies of the revised document distributed to personnel as needed. Revised manuals will be marked with a revision date and new version number.

#### 21. Compliance with Delaware Laws and Regulations

Guided Steps is a committed proponent of Delaware's Medical Marijuana Program, as embodied in Chapter 49A – The Delaware Medical Marijuana Act (the "Act"). Guided Steps requires all employees to read the Act, as well as all regulations issued by Delaware Health and Social Services ("DHSS") in connection with the Act.

**Chapter 49A – The Delaware Medical Marijuana Act**

<http://delcode.delaware.gov/title16/c049a/index.shtml>



**State of Delaware Medical Marijuana Code**

<http://regulations.delaware.gov/AdminCode/title16/Department%20of%20Health%20and%20Social%20Services/Division%20of%20Public%20Health/Health%20Systems%20Protection%20%28HSP%29/4470.shtml>

Knowledge and understanding of Delaware's medical marijuana laws are vital; therefore, all employees will be trained in these areas as part of their new hire orientation process. Any updates to these laws will be incorporated into Guided Step's ongoing training and education program.

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Appendix F – Criminal History Background Checks

**FABIAN B. LIVINGSTON**



**STATE OF DELAWARE**  
**STATE BUREAU OF IDENTIFICATION**

**New Castle County - Satellite Facility**  
Delaware State Police Troop Two  
100 LaGrange Ave  
Newark, DE 19702  
(Between Rts. 72 & 896 on Rt. 40)  
**by appointment only**  
scheduling: 302-739-2528 – local  
1-800-464-4357 - toll free

**Kent County - Primary Facility**  
Delaware State Police Headquarters  
655 S. Bay Road – Ste B - P.O. Box 430  
Dover, DE 19903-0430  
**walk-ins accepted**  
Customer Service: 302-739-5884  
Professional Licensing: 302-739-5991

**Sussex County - Satellite Facility**  
Delaware State Police Troop Four  
South DuPont Hwy & Shortley Rd, Georgetown  
(across from DelDOT & the State Service Center)  
by appointment only  
scheduling: 302-739-2528 – local  
1-800-464-4357 - toll free

**Kent County Hours of Operation**  
Monday-8:30 am - 7:00 pm  
Tuesday - Friday-8:30 am - 3:30 pm

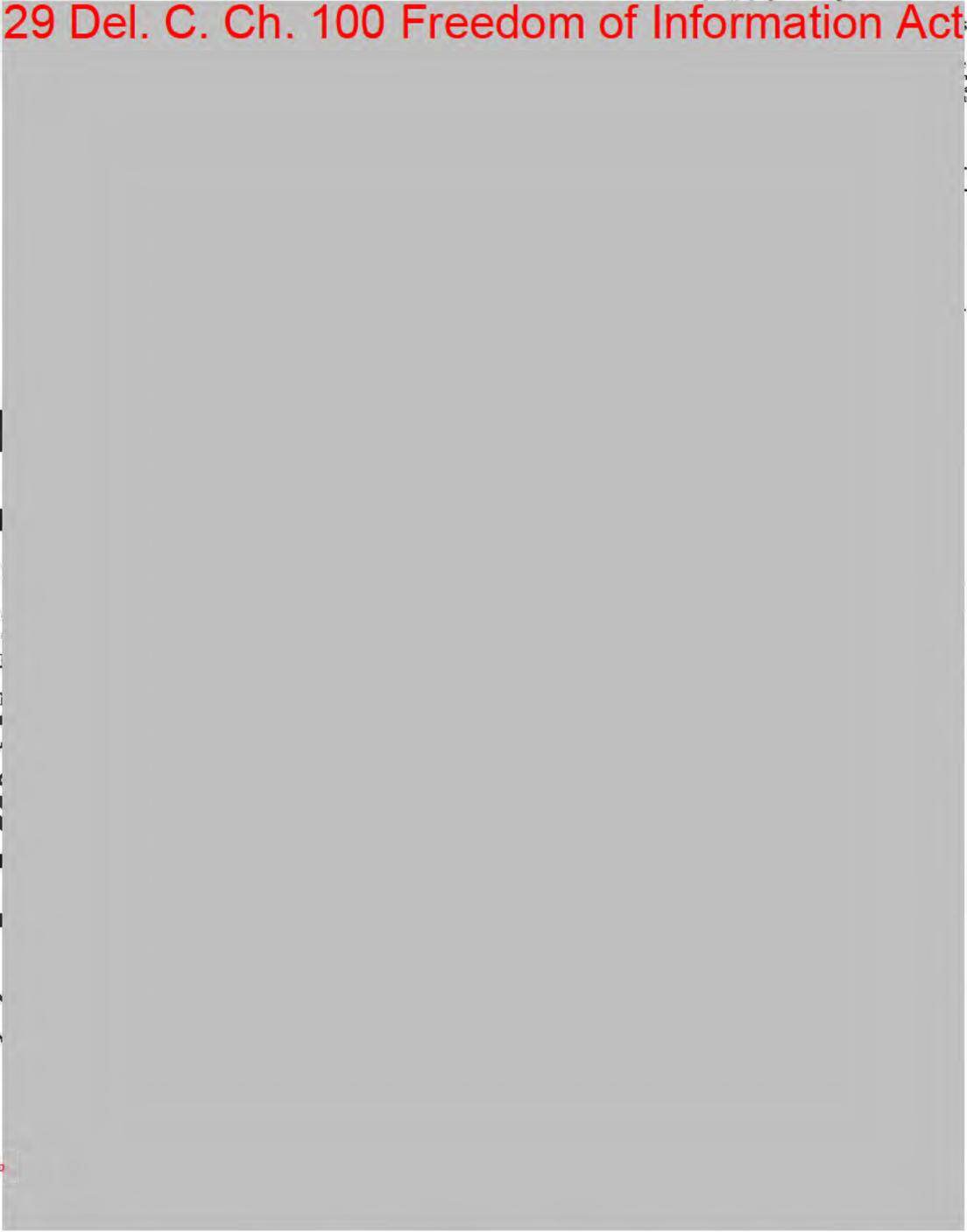
**RECEIPT / VERIFICATION**

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

**\*\* This is your only Receipt \*\***

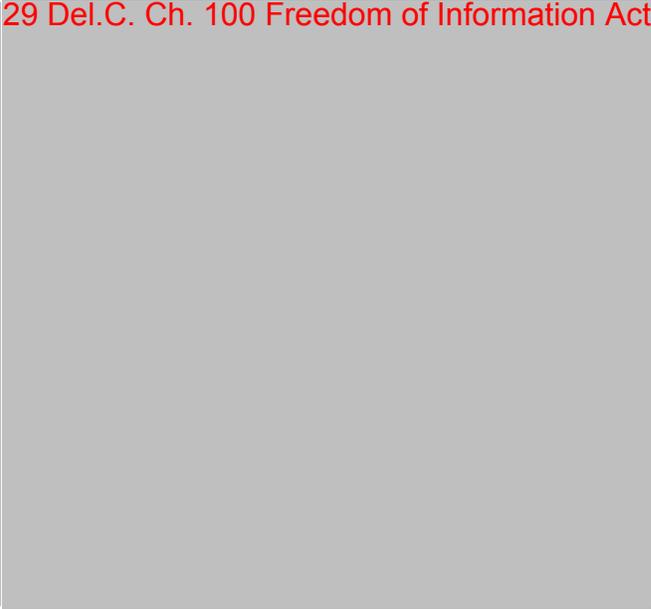
*Apple's*

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



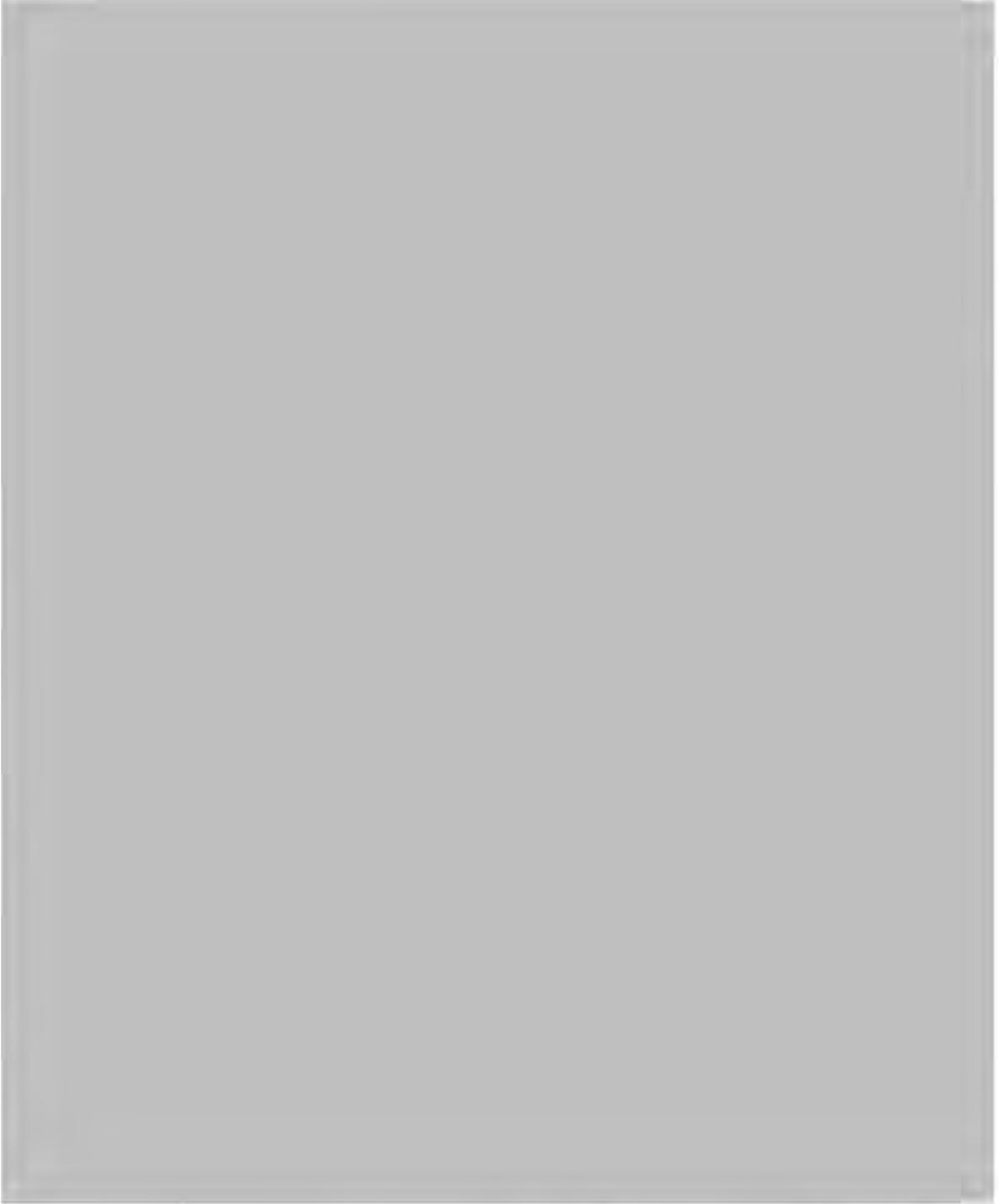
*MA 1623  
3/20/2014*

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**RAMANE O. JONES**

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



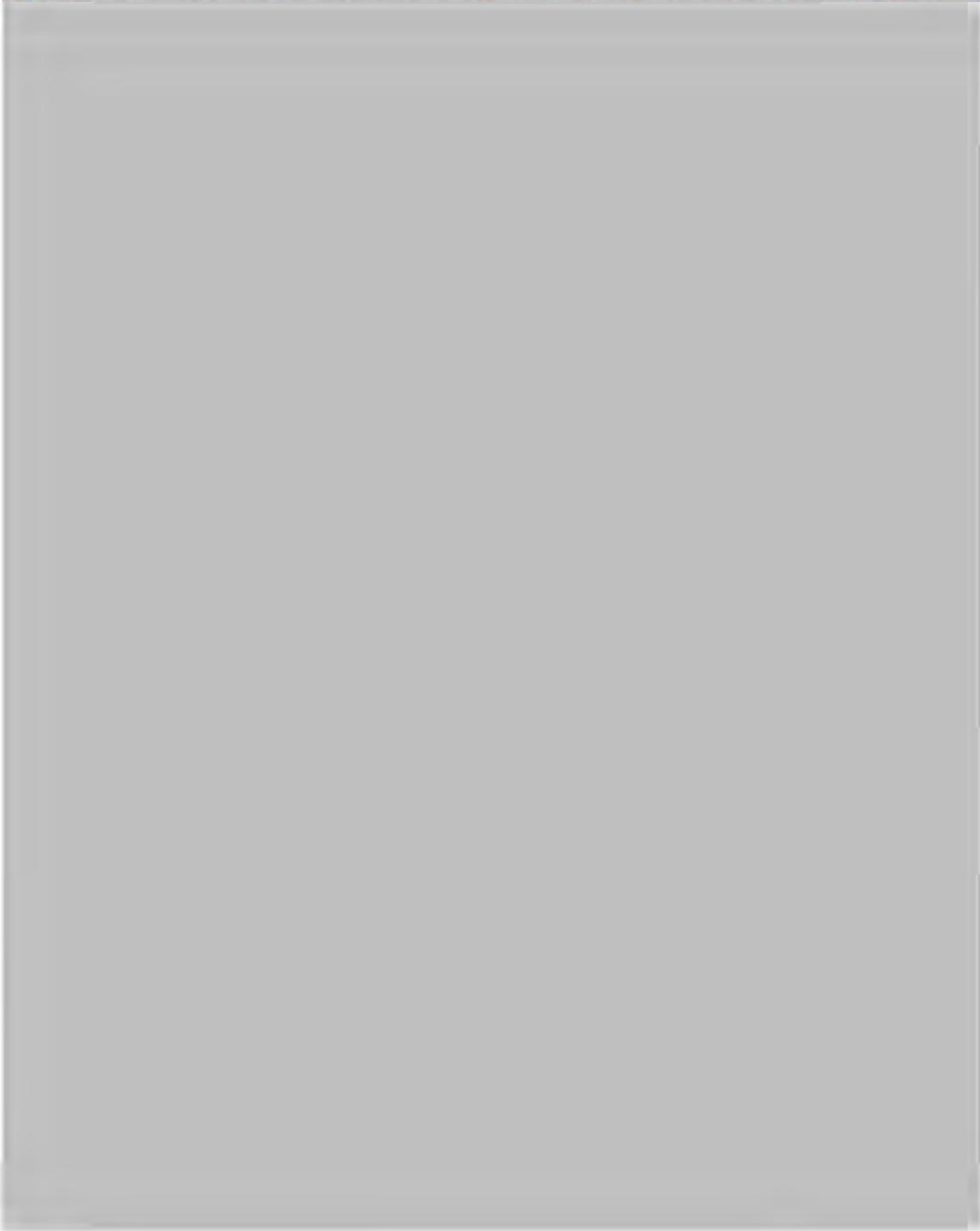
**ELIZABETH A. FORD**

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



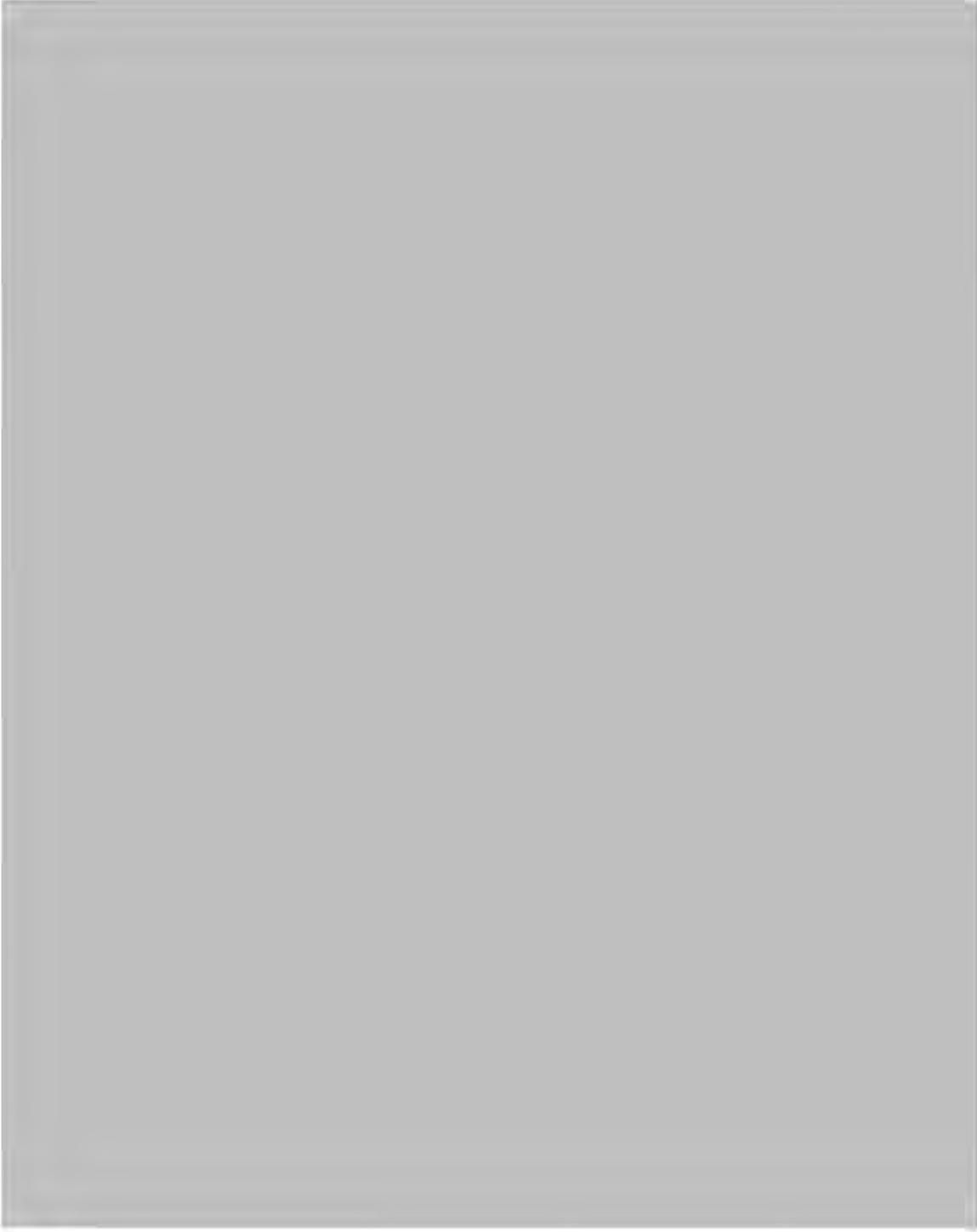
FBI

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



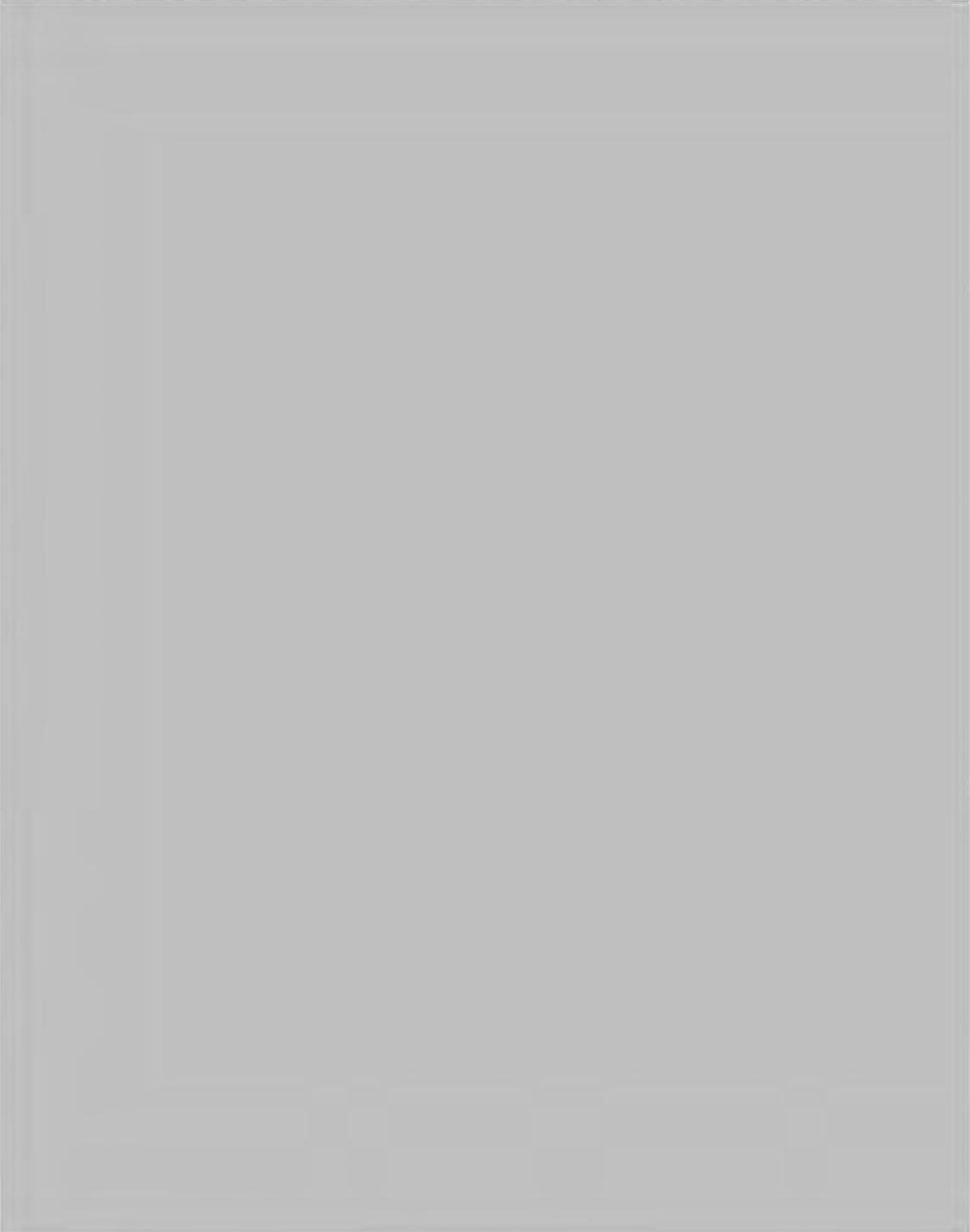
STATE OF DELAWARE

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

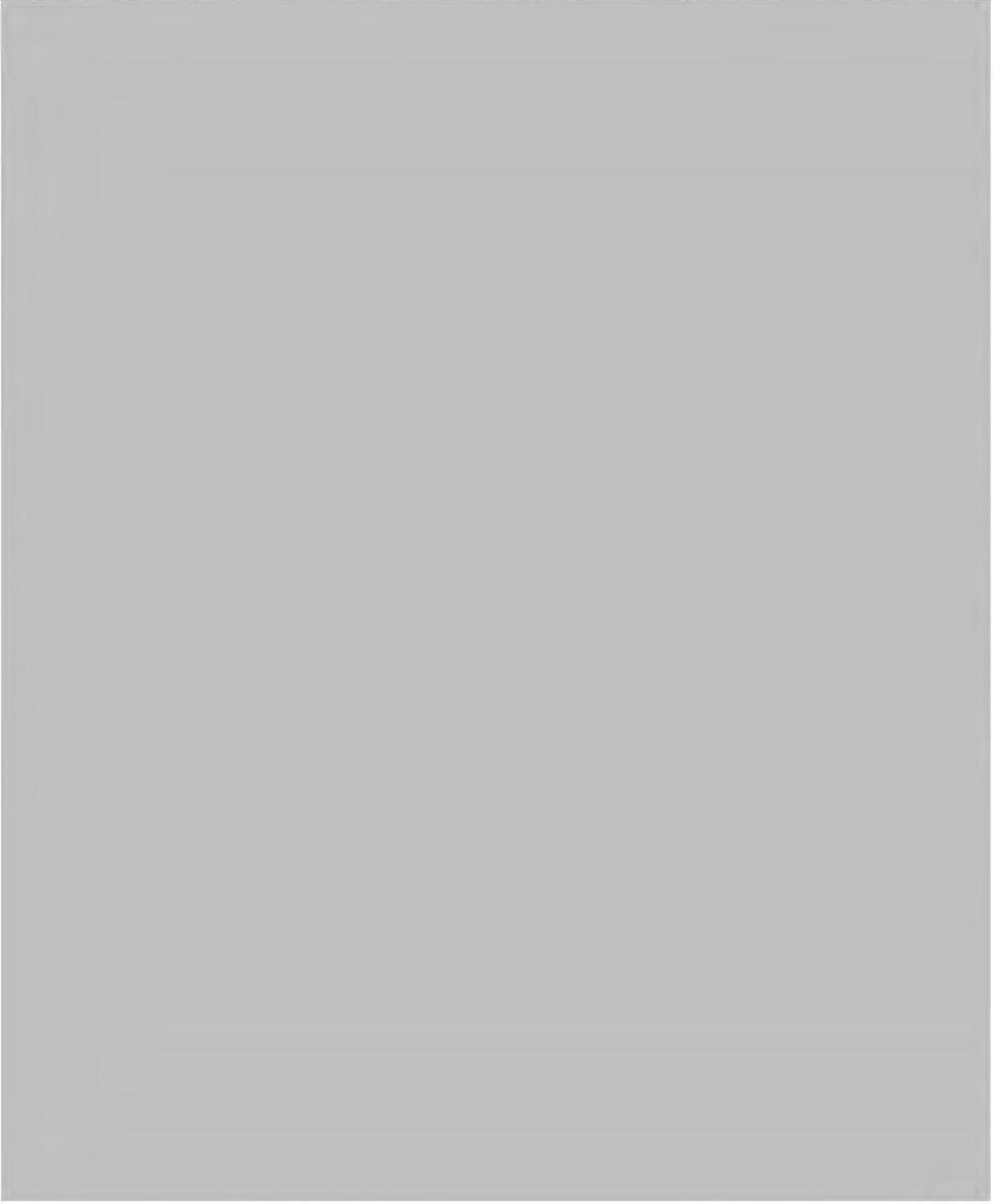


**GIA LIVINGSTON**

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



*2015*  
**29 Del. C. Ch. 100 Freedom of Information Act**



*MAILED  
3/20/2014*

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**Appendix G – SOP 111: Compassionate Courier Service**

	Document Identifier	Version	Effective Date
	SOP 111	0.1	DD MMM YYYY
<p><i>Note: This SOP will be revised once Guided Steps Compassion Center has been established, and the Compassionate Courier Service has been further defined.</i></p>			
<h1>Compassionate Courier Service</h1>			
<p>73 Artisan Drive Smyrna, DE 19977 (302)653-####</p>		<p>&lt;Insert website address&gt;</p>	



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DRAFT



SOP 111: Compassionate Courier Service

1. Revision History

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

DRAFT



SOP 111: Compassionate Courier Service

**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>

DRAFT



SOP 111: Compassionate Courier Service

**3. Purpose**

The purpose of this document is to outline the process for Guided Steps Compassion Center's "Compassionate Courier Service" to ensure safe and secure delivery of medicine to patients.

**4. Scope**

This SOP applies to all Guided Steps Compassion Center personnel.

**5. Related Forms**

1. Transportation Manifest
2. Incident Report

**6. Definitions**

There are no terms to be defined for this SOP.

**7. Compassionate Courier Service Procedure**

Patients able to administer their own medication (not requiring assistance from a designated caregiver), but are unable to come to the facility to pick up their medicine, may make arrangements for delivery via phone or on-line.

Patients calling in for courier service may expect arrival of their medication within the following windows:

1. Kent County: 1 – 2 hours
2. New Castle County: 2 – 3 hours
3. Sussex County: 1 – 2 hours

**7.1. Preparing for Delivery**

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**7.2. Delivery**

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### 8. Same Day Courier Service

1. New Castle and Sussex Counties
  - a. Patients must place orders between 9:00am and 12:00pm.
  - b. Patient will receive a confirmation call approximately 15 minutes after the order has been placed via online or telephone to set up an appointment for delivery between 10:00am and 2:00pm.
2. Kent County
  - a. Patients must place order between 9:00am and 2:00pm.
  - b. Patient will receive a confirmation call approximately 15 minutes after the order has been placed via online or telephone to set up an appointment for delivery between 9:45am and 2:00pm.

### 9. Missed Deliveries and Restocking Fee

1. If a patient is not at his/her place of residence at the time of delivery, driver will document details on the Transportation Manifest.
2. Driver will leave a "Missed Delivery" note at the residence with instructions for patient to contact Guided Steps to reschedule the delivery.
3. Multiple missed deliveries and/or making the driver wait will result in a review for termination of delivery service privileges.

### 10. Safety Guidelines

The following safety guidelines will be adhered to by delivery drivers as well as communicated to patients and caregivers:

1. Abuse of the service or our staff will result in denial of service.
2. Drivers will wear a portable panic button device (with GPS) to utilize in case of an emergency.
3. Driver vehicles are tracked via GPS through security headquarters.
4. Deliveries will only be made during daylight hours.
5. Deliveries will be made to residences only.
6. Drivers retain the right to refuse service to anyone.
7. Maximum order is 1 ounce of medication.
8. Drivers will not be in uniform or in a marked car.



SOP 111: Compassionate Courier Service

9. Drivers are randomly and anonymously followed by our trained safety personnel to ensure best practices.
10. Deliveries will be packaged in discreet bags.
11. Pets must be restrained during the visit.

**11. Records**

The original signed copy of this document is stored in the SOP 111: Compassionate Courier Service binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.

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INCIDENT REPORT			
Incident Details			
Date		Initiator Name	
Incident Severity (Check One)	<input type="checkbox"/>	<b>CRITICAL</b>	<input type="checkbox"/> <b>MAJOR</b> <input type="checkbox"/> <b>MINOR</b>
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	



**Transportation Manifest**

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

TOTAL # of Deliveries		TOTAL Transported Amount				
<b>Guided Steps Compassion Center Information</b>						
Registry ID #						
Contact Name		Phone #				
Contact Signature						
<b>Driver Information</b>						
Registry ID #						
Driver Name		Phone #				
Occupational License #						
Vehicle Make & Model		License Plate #				
<b>Delivery Information - Stop #1</b>						
Patient Registry ID #						
Patient Name		Phone #				
Patient Address						
Travel Route						
Departure From GSCC Facility		ETA for Stop #1				
Actual Arrival Time <i>(If late arrival, enter reason for delay)</i>						
ETA		Actual Arrival Time <i>(If late arrival, enter reason for delay)</i>				
Item Description	Weight	Qty	Barcode	Accepted/Rejected		Patient/Caregiver Initials
				A	R	
If any item was rejected, enter reason for rejection						
Name of Person Accepting/Rejecting Product		Registry ID #				
I confirm that the contents of this shipment match weight records entered above, and I agree to take custody of those portions of this shipment not circled above. Those portions circled were returned to the individual delivering this shipment.						
Signature		Date				
I confirm that this patient's identification was verified as described below, and the contents of this shipment were delivered to this patient matching the weight records entered above.						
Method of Verification		ID #				
Driver Signature		Date				

Transportation Manifest Continued

Delivery Information - Stop #2						
Patient Registry ID #						
Patient Name					Phone #	
Patient Address						
Travel Route						
Departure From Stop #1				ETA for Stop #2		
Actual Arrival Time <i>(If late arrival, enter reason for delay)</i>						
Item Description	Weight	Qty	Barcode	Accepted/Rejected		Patient/Caregiver Initials
				A	R	
If any item was rejected, enter reason for rejection						
Name of Person Accepting/Rejecting Product				Registry ID #		
I confirm that the contents of this shipment match weight records entered above, and I agree to take custody of those portions of this shipment not circled above. Those portions circled were returned to the individual delivering this shipment.						
Signature					Date	
I confirm that this patient's identification was verified as described below, and the contents of this shipment were delivered to this patient matching the weight records entered above.						
Method of Verification				ID #		
Driver Signature				Date		

*Attach map of travel route to Transportation Manifest*

Appendix H – SOP 108: Growing, Cultivating & Disposal

	Document Identifier	Version	Effective Date
	SOP 108	0.1	DD MMM YYYY

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

# Growing, Cultivating & Disposal



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	Elizabeth Ford	Initial version

DRAFT



SOP 108: Growing, Cultivating & Disposal

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.	
<b>Elizabeth Ford</b> VP of Finance and Operations	
_____ 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.	
<b>Fabian Livingston</b> President	
_____ Signature	_____ Date (DD-MMM-YYYY)

DRAFT

**3. Purpose**

The purpose of this document is to outline the medical marijuana growing, cultivation and disposal procedures for Guided Steps Compassion Center to ensure consistency throughout the growing, cultivating and disposal process.

**4. Scope**

This SOP applies to all Guided Steps personnel involved in the growing, cultivation and disposal of medical marijuana.

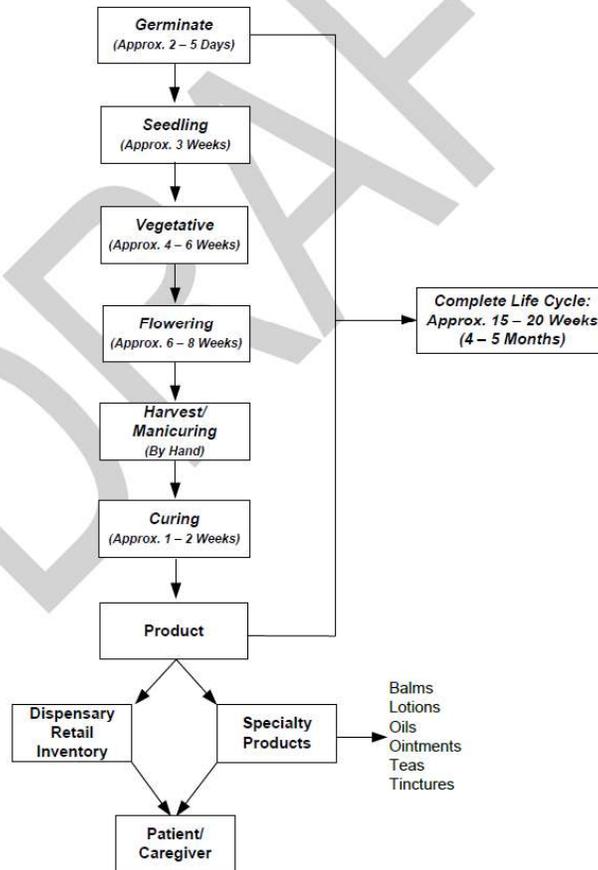
**5. Related Forms**

1. Staff Log
2. Daily Grow Room Checklist
3. Product Testing Results
4. Product Testing Report Log

**6. Definitions**

There are no terms to be defined for this SOP.

**7. Medical Cannabis Production Life Cycle**



**8. Grow Strategy Phases**

The following plant lifecycle strategy will be used for the hydroponic growing process:

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**8.1. Cloning**

The following steps will be following for the cloning process:

**8.1.1. Required Supplies**

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**8.1.2. Preparation**

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8.1.3. Cuttings

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8.2. Hydroponic System

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9. Cultivation

9.1. Harvesting

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9.2. Curing

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

9.3. Pruning

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10. Disposal

10.1. Bad Batch

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10.2. Overproduction

In order to remain in compliance with Sections 7.2.6.1 and 7.2.6.2 of the State of Delaware Medical Marijuana Code, overproduced medical cannabis will be disposed as follows: described above.

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**10.3. Recall**

In the event medical cannabis is recalled for any reason, the following steps will be adhered to:

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**11. Records**

The original signed copy of this document is stored in the SOP 108: Growing, Cultivating & Disposal binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.



Staff Log					
Date	Activity Description	Comments	Employee Name	Employee Signature	Manager Initials

DRAFT

Daily Grow Room Checklist		
<b>Lights</b>	Open	Close
Check all lights, timers, and power; make sure everything is working properly and safely.		
Make sure bulbs are burning bright and do not need to be changed out.		
Check to see if your bulbs and hoods are clean and clean them accordingly.		
Check the light's distance from the plants to ensure they are getting proper amounts of light but not getting burned.		
Make sure all electrical cords are all plugged in completely.		
<b>Water</b>	Open	Close
Check hydroponic system to ensure the pumps are working and plants are being fed.		
Check timers and power heads.		
Check the H2O levels in the reservoirs ( <i>H2O evaporates; not the nutrients</i> ). To maintain a consistent mix add only H2O, if needed.		
Completely change out water and nutrients every 2 weeks. Date of last water change: _____		
<b>pH Levels</b>	Open	Close
Check pH levels in the reservoir/nutrient solution, making sure it is as close to 6.0 as possible.		
Monitor the EC(or ppm in North America), aka the strength of your nutrient solution to make sure it is correct.		
<b>Temperature</b>	Open	Close
Keep daytime temps at 75°F(23.8°C).		
Nighttime temperature should stay between about 68-72°F(20-22.2°C).		
<b>Air</b>	Open	Close
Airflow – Make sure all fans are working correctly and air is being pulled properly.		
CO2/other – Make sure your system is running properly at the proper environmental levels, regulate if needed.		
Check any air fresheners/odor elimination systems.		
<b>Humidity</b>	Open	Close
Keep it at 40-50% ( <i>Too much humidity causes moldy bud rot!</i> )		
<b>Circulation</b>	Open	Close
Make sure the plants are moving a little bit and getting a nice oscillating breeze.		
<b>Other</b>	Open	Close
If growing in soil, rotate(turn) your plants each day. This will ensure they get maximum light exposure. Also check for dry pockets and water accordingly.		
Check for pests and fungus or any other plant diseases/abnormalities and handle accordingly.		
Check the leaves surface as well! Especially check for spider mites under your leaves. These will make little webs.		
Cleanup your grow area!		
Make sure everything is working.		
<b>Comments</b>		
Employee: _____		Date: _____
Manager: _____		Date: _____



Product Testing Results			
Date		Employee Name	
Strain Tested		Batch Number	
Amount Tested		Test Performed	
Where was test performed?			
Test Results			
Follow-Up Actions (If Any)			
Comments			
Employee Signature	Title	Date (DD/MMM/YYYY)	
Manager Signature	Title	Date (DD/MMM/YYYY)	



## Appendix I – Steep Hill Halent Laboratories



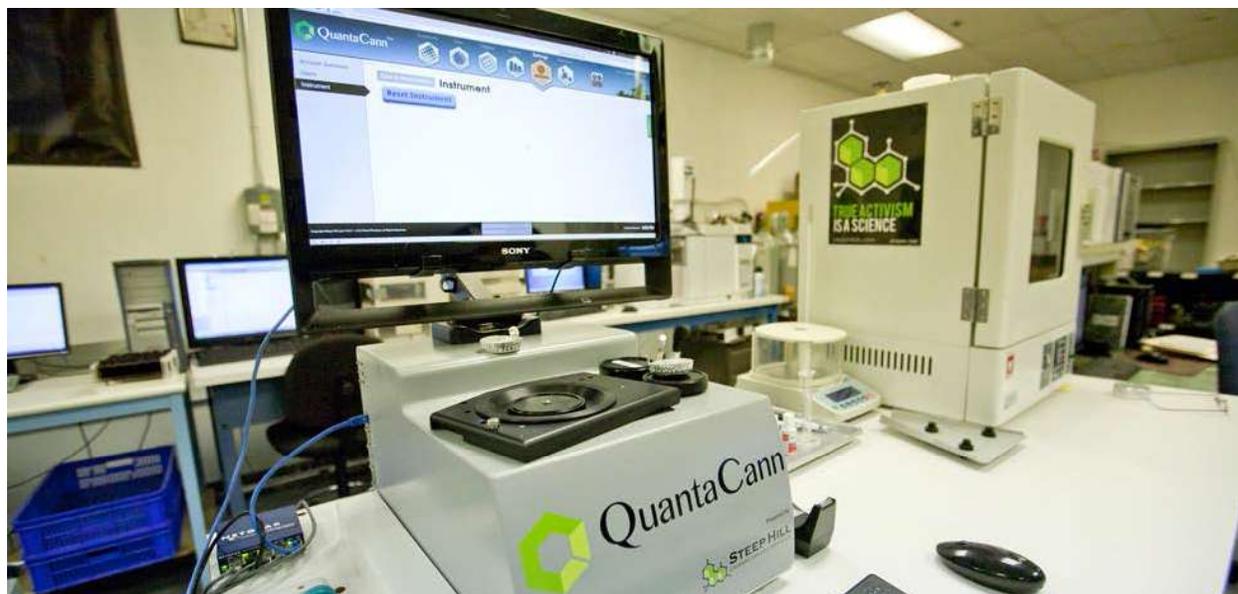
# QuantaCann™

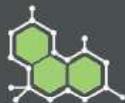
## Instant Cannabis Analysis

QuantaCann is a laboratory-grade cannabis testing unit, installed onsite at the collective or production level, that utilizes Near-Infrared Spectroscopy (NIR) to analyze cannabis flowers and granular water hash by taking a spectral scan of each sample. Each sample's spectral data is sent to Steep Hill Halent's in-house servers using an encrypted connection. We then calculate the THC-A, THC (pre and post-decarboxylate values), CBD, and moisture in the sample by comparing it against our database of thousands of Liquid Chromatography and Gas Chromatography tested samples. *Each scan takes just 60 seconds.*

QuantaCann is controlled using a web application which may be accessed from any browser. The app tracks all samples you have scanned, creating a searchable database, as well as providing analytics on how locally tested samples compare to all those tested across the QuantaCann network. After testing a sample, results may be exported and shared directly from the QuantaCann app to Facebook, Weedmaps, or by email. There is no limit to the number of samples that may be tested.

QuantaCann units measure 18.5" x 13" x 9.5" minus the included monitor which we recommend placing on top the unit. All we require for setup is a static Web IP address and ethernet connection at the install location. We travel out to install each QuantaCann unit and train as many employees as needed on the day of the install. If training for additional employees after the initial installation is required, we will work it out on a circumstantial basis; the cost is an hour or so of consulting plus travel expense.





**Steep Hill Halent™**  
CANNABIS ANALYTICS AND RESEARCH

## Steep Hill Halent Laboratories

We are committed to quality assurance, public education, and legitimization of the cannabis industry.

**Steep Hill Halent** was formed when Steep Hill Laboratories Inc. and Halent Scientific, the nation's two leading cannabis testing and research companies, merged to form the world's leading analytical cannabinoid testing and research facility. Our broad client base includes patients, collective dispensaries, cultivators, edible producers, and concentrate producers in medical and legal cannabis states and countries.

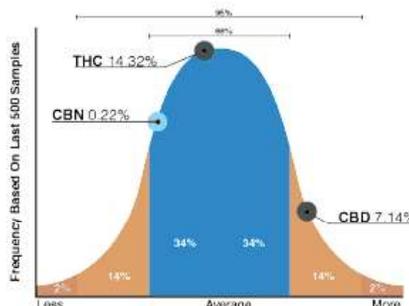


We are committed to quality assurance, public education, and legitimization of the cannabis industry. As experienced growers, collective owners, doctors, and activists, we have a passion for the industry and movement. We continue to fight prohibition by lobbying regulatory entities, and expanding access to those who benefit from cannabis.

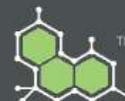
**True activism is a science.**

With nearly 100,000 samples tested since 2008, we are more focused than ever on bringing quality assurance and legitimacy to the world-wide cannabis industry. Our team includes public health advocates, industry activists, tenured chemists, and skilled technicians with decades of clinical and laboratory experience.

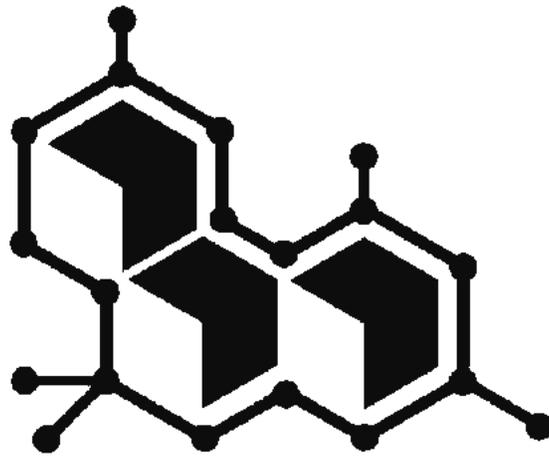
By adhering to guidelines used by clinical and reference laboratories throughout the United States, Steep Hill Halent has become the global standard for quality control, changing the world's viewpoint on cannabis. Our research has made it possible for growers, product producers, and collective dispensaries to identify and safely administer the most beneficial cannabis products for their patients and customers. We have amassed the largest database of actual market cannabis samples, and have accelerated the rate of policy change by presenting our findings to the public, giving municipalities and critics confidence in the safety of cannabis.



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# **A Steep Hill Guide To Medical Cannabis Testing**

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**\*. Steep Hill Lab SOP for Sample Prep**



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R-06212012

## Introduction

The safety and effectiveness of both over the counter and prescription medications in the USA are mandated by federal law.

The need to protect the public in this regard is morally and ethically indisputable.

In the case of medical cannabis the federal government has not as yet caught up with those progressive state governments who have had the vision to recognize the proven benefits of medical cannabis and cannabis products. Since testing for potency and safety of medications are normally within the domain of the federal government it is understandable that the states approving medical cannabis have not yet addressed this issue. As a practical matter the states do not have regulatory mechanisms (such as the FDA) to do so. Yet the issue remains.

Without proper testing, any assurances towards the efficacy or safety of medical cannabis cannot be given.

In response to this serious omission, some providers of medical cannabis are exercising their due diligence and are protecting their patients with proper testing.

The purpose of this guide is to inform the consumer how this testing is done and the meaning of the results.



## Sampling

When submitting samples for analysis great care must be taken to ensure that the sample is representative of the entire lot from which it is taken. Sampling error is the most common source of analytical variation in the testing process.

The best practice is to take multiple small subsamples to make a composite sample. For medical cannabis several pieces taken randomly from multiple buds will yield far more repeatable results than selecting just one bud.

## Moisture Analysis

Approximately 1.5 to 2.0 grams of sample are weighed to the nearest milligram and placed into a vacuum air over. After the drying period the samples are reweighed. Weight loss on drying is recognized as the preferred methodology for all agricultural products.



## Potency Analysis

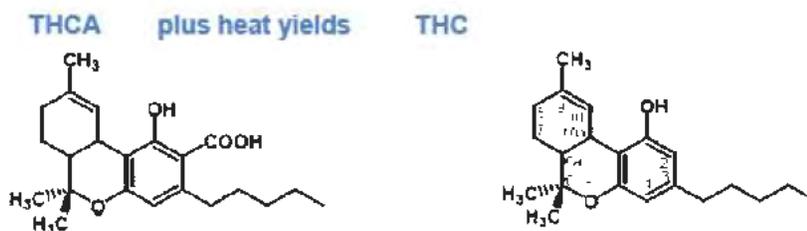
Potency analysis for cannabis and cannabis products utilizes two primary methods. These are Gas Chromatography (GC) and High Pressure Liquid Chromatography (HPLC). Differences exist between these two methods. These differences dictate the sample types that are appropriate for GC or HPLC.

Simply stated, a GC uses high temperature to help separate the different constituents of the sample. The HPLC operates at room temperature and does not use heat.

The primary psychoactive component in cannabis is THC. However THC is present in only trace amounts in cannabis. THC is formed by the application of heat to the Acidic form of THC known as THCA which is abundant in cannabis.

This process is known as **decarboxylation**.

Decarboxylation describes the loss of the carboxyl (COOH) group. The carboxyl group is not strongly bonded to the parent molecule and is lost when cannabis is smoked or used in a vaporizer. Therefore when cannabis is smoked or vaporized the best method of analysis is the GC.



When edible samples or tinctures are to be analyzed the preferred method is HPLC since heat is not involved prior to consumption.

A new alternative method has been developed using Near Infrared Reflectance (NIR) has been developed at Steep Hill Lab. NIR is a form of Molecular Vibrational Spectroscopy. A detailed description of this technology is available at [QuantaCann.com](http://QuantaCann.com)

## Mold and Fungal Analysis

Samples are agitated with sterilized water and the resultant liquid is plated on

Agar growth media in standard grow plates. These are incubated for 72 hours at 25 degrees Celsius. The resultant colonies are counted and identified. Samples which fail due to high colony counts or the presence of pathogens are disallowed.



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## Steep Hill Lab

# Standard Operating Procedure (SOP)

## For Preparing Dried Products (i.e. flowers and hash) for analysis

1. **For samples to be submitted for testing to Steep Hill Lab for Potency, Microbiological or Pesticide Testing**
  - a. Confer with a Steep Hill representative to determine sample volume needed for analysis ordered.
  - b. Begin the process by setting up a clean, preferably sterile area.
  - c. Wear properly fitting latex gloves.
  - d. Open the bag, jar, or vessel containing the material to be sampled.
  - e. Rather than submitting one bud it is recommended that a small amount is collected from several areas to get a better representation of the whole batch.
  - f. Place sample in a clean weigh dish.
  - g. Place sample in a labeled plastic bag that specifies sample name that you expect to appear on the results and also the tests ordered.
  - h. Store in a cool, dark environment until submitting to the lab for testing.



2. **For samples to be tested on-site with QuantaCann,**
  - a. Begin the process by setting up a clean, preferably sterile area.
  - b. Wear properly fitting latex gloves.
  - c. Open the bag, jar, or vessel containing the material to be sampled.
  - d. Remove bits of the material from different areas to get a representative sample.
  - e. Place sample in a clean weigh dish to prepare for grinding.
  - f. Place sampled material into a clean herb grinder and grind into small bits.
  - g. Transfer the contents of the grinder to a clean QuantaCann quartz cup, slightly overfilling the base of the cup.
  - h. Twist to lock the sample cover and close the cup.
  - i. Sample is now ready for scanning.
  - j. Following scanning make sure to follow cleaning protocol.



## Cleaning Protocol for Sample Tools and Testing Area

### 1. Grinders

- a. Clean grinders with a brush between each use. When residue begins to build up (after about 3-5 uses) fill each half of the grinder with 99% Isopropyl Alcohol and let sit for 30 minutes. Remove the alcohol and rinse with clean water. Dry the grinder thoroughly before the next use. If you intend to do microbiological analysis on ground samples then the grinder should be sterilized with Isopropyl Alcohol between each use.
- b. It is important to thoroughly clean grinders because leftover material from other products can affect the accuracy of results.
- c. Grinders become more difficult to clean the longer they go without cleaning.

### 2. Sampling Area

- a. Sampling should occur in a clean area away from food or other contaminants.
- b. Surface areas should be wiped with Alcohol to ensure the sterility
- c. Area should be free of excessive humidity.

### 3. QuantaCann Quartz Cup

- a. Clean the cup with a brush after each use.
- b. Spray or wipe the lens and cup with isopropyl alcohol using a non-abrasive cloth. Allow to dry completely before using.
- c. DO NOT CLEAN WITH PAPER TOWELS OR ANY OTHER ABRASIVE PRODUCT
- d. Clean often and only with alcohol.

### 4. QuantaCann Tray

- a. Brush the tray after each use to remove particulates. If any part of the tray or lens looks dirty, spray with isopropyl alcohol and wipe with a non-abrasive cloth. Allow to dry completely and be free of film before next use.



**Appendix J – SOP 110: Medical Cannabis Quality Assurance Testing**

	Document Identifier	Version	Effective Date
	SOP 110	0.1	DD MMM YYYY

**Note:** This SOP will be compiled once Guided Steps Compassion Center has been established, and the medical cannabis quality assurance testing procedures are defined and documented utilizing the Steep Hill Halent QuantaCann system.

# Medical Cannabis Quality Assurance Testing

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

<Insert website address>



SOP 110: Medical Cannabis Quality Assurance Testing

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DRAFT



SOP 110: Medical Cannabis Quality Assurance Testing

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. Purpose**

The purpose of this document is to outline Guided Steps Compassion Center's medical cannabis quality assurance testing procedures.

**4. Scope**

This SOP applies to all Guided Steps employees in the Cultivation Department.

**5. Related Forms**

1. <Add applicable forms>

**6. Definitions**

**7. Procedures**

**8. Records**

The original signed copy of this document is stored in the SOP 110: Medical Cannabis Quality Assurance Testing binder, as well as an electronic version stored in the Guided Steps' electronic SOP repository.

**Appendix K – SOP 102: Safety and Security**

	Document Identifier	Version	Effective Date
	SOP 102	0.1	DD MMM YYYY

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

# Safety and Security



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	<Security Mgr.>	Initial version

DRAFT



SOP 102: Safety and Security

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> <b>Security Manager</b>	
_____	_____
<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 102: Safety and Security

**3. Overview**

Guided Steps Compassion Center ("Guided Steps") is committed to providing a safe and healthy working environment for employees and others in the workplace. The aim of Guided Steps is to build a culture that encourages everyone in the workplace to take responsibility for maintaining and enhancing this environment.

This policy provides an overview of responsibilities in relation to health, safety and security process in place at Guided Steps. This policy and the various procedures which exist from time to time are designed to ensure that employees are not exposed to risks to their health or safety

**4. Scope**

This policy applies to all employees of Guided Steps. This policy operates as directions from Guided Steps to employees and does not vest enforceable rights in the employees. This policy does not form part of any employee's contract of employment and any obligations contained herein on Guided Steps and/or its management are not binding on Guided Steps and/or its management. Where there is any conflict or inconsistency between the employee's contract of employment and this policy, the provisions of the contract of employment will prevail.

Guided Steps may review, vary, add to or withdraw the policy from time to time within its absolute discretion.

This policy applies to employees in all work related activities including work functions, offsite storage, company motor vehicles, lunch and recess breaks, direct travel to and from home and employees' homes where approved working from home arrangements exist.

**5. Forms**

1. Incident Report
2. Incident Report Log
3. Visitor Log
4. Office Key Assignment Log
5. Access Badge Assignment Log
6. Facility Inspection Log
7. Robbery Response Kit

**6. Definitions**

TERM	DEFINITION
Hazard	A source or a situation which has a potential to cause harm In terms of human injury or ill-health, damage to property, damage to the environment or a combination of these. A source or situation can include substances (both hazardous and dangerous), plant, work processes and/or other aspects of the work environment
Risk	The likelihood that death, injury or illness might result when exposed to the hazard.

**7. Obligations**

**7.1. Management Responsibilities**

Management includes any member of the Guided Steps senior management team and any employee of Guided Steps overseeing the work of another employee.

Management must ensure that the functional areas of Guided Steps within their control comply with the applicable legislation and Guided Steps policies.

In carrying out these obligations, management is expected to:

- Provide and maintain a safe and healthy work environment;

- Establish processes of the operation of the workplace health and safety risk management processes within their work areas;
- Monitor all aspects of health and safety process;
- Ensure safe systems of work and ensure that any plant or substance used for the purpose of work is used safely;
- Ensure employees are provided with adequate information, instruction, supervision, and training for safe work practices;
- Establish and support consultative mechanisms within their work area;
- Ensure effective communication between all parties regarding relevant workplace health and safety issues;
- Ensure all work related incidents are followed up and appropriate steps are taken to prevent recurrence;
- Ensure health and safety issues are resolved;
- Ensure all resolved health and safety issues are monitored and reviewed;
- Ensure appropriate safe access to and from the work place for both workers and visitors;
- Ensure the risk of injury or illness to any persons visiting and using plant or equipment is minimized when used properly;
- Include workplace health and safety as a standing item at management meetings;
- Budget for health and safety resources such as training, safety equipment, furniture, and modifications.

#### 7.2. Employee Responsibilities

All employees have an obligation to comply with the applicable state legislation and Guided Steps policies.

As such, all employees are required to:

- Comply with workplace health and safety instructions at the workplace;
- Report hazards at work and take corrective action to eliminate hazards where appropriate;
- Report all work related injuries, illnesses and applicable near misses;
- Use any personal protective equipment provided by Guided Steps in accordance with training provided;
- Not willfully or recklessly interfere with or misuse any equipment provided in the interests of workplace health and safety;
- Not willfully place at risk the health and safety of anyone within the workplace;
- Not willfully injure themselves;
- Practice in training when instructed to do so;
- Cooperate with Guided Steps in so far as necessary to enable compliance with any requirement under applicable legislation imposed in the interest of workplace health and safety;
- To the extent possible, maintain a safe and healthy work environment.

#### 8. Consultation

Guided Steps will consult with employees about workplace health and safety matters as required by law. Guided Steps values the views and opinions of its employees and will endeavor to obtain and take account of such input. Employees are encouraged to express their views and contribute the resolving matters within their workplace.

#### 9. Workplace Health and Safety Risk Management Process

Risk management processes are to be applied to all work activities. This means that:

- a) Hazards will be identified;
- b) Risks that may result from the hazards will be assessed;
- c) Control measures that will prevent or minimize the level of the risks, will be decided upon;
- d) The control measures will be implemented; and
- e) The effectiveness of the control measures will be monitored and reviewed.

#### 10. Identification of Hazards

Hazard identification may occur through observing, inspecting, investigating, communicating and consulting. All employees have an obligation to report hazards and hazardous activities. Such reports should be made to management through direct supervisors. Any hazard identified should be recorded using the applicable documentation.

To begin identifying hazards, a person should simply ask the question, "Does this task/activity/situation/event have the potential to harm a person?" Another way is to ask the question, "What if?" These are proactive ways to identify hazards. Hazards can also be identified from records of past accidents and near misses.

To assist in identification, hazards may be categorized as follows:

HAZARD TYPE	DEFINITION
Obvious Hazard	Apparent to senses.
Concealed Hazard	Not apparent to senses.
Developing Hazard	Cannot be recognized immediately and will develop over time.
Transient Hazard	An intermittent or temporary hazard.

It is important to remember that a hazard may become more obvious and easily identifiable when an employee actually performs a task, which is often the case with ergonomics or manual tasks.

To make the job of identifying hazards in the workplace easier, it is necessary to prepare and establish the context for the risk management process. This involved identifying:

- All activities involved in work processes and tasks;
- Who is involved in those activities.

A list of all hazards at the workplace will be made by Management. Once this list of hazards is compiled, each hazard will be considered individually.

If an employee sees an unsafe situation that poses an immediate risk to the safety of themselves or another person, they should:

- Take appropriate steps to eliminate the hazard if they can and it is safe to do to;
- If the hazard cannot be eliminated immediately, warn other people involved;
- Report the hazard to Management.

There are a number of general hazards in the workplace, some of which may include the following:

- Work environment (e.g. slippery floors, confined spaces, cold rooms);
- Energy (e.g. electricity);
- Manual tasks (e.g. lifting a load overhead or repetition of work);
- Noise (e.g. loud music in an enclosed small area);
- Substances (e.g. chemicals)
- Vehicles, equipment or plant (e.g. machinery, office equipment);
- Work at heights (e.g. work done on ladders);
- Systems of work (e.g. processes, procedures, or actions);
- Exposure to violence (e.g. working with violent patrons);
- Exposure to workplace harassment (e.g. working with bullies);
- Personal hygiene (e.g. contaminated hands whilst preparing products).

#### 11. Risk Assessment

Risks are measured according to the likelihood and severity of injury. A risk assessment is to be conducted for all hazards identified in the workplace. Risks must be assessed and prioritized using processes equivalent to those set out in relevant advisory standards under relevant legislation.

Risk assessments are to be overseen by the relevant managers in conjunction with other relevant staff as appropriate.

Risk assessments are to be conducted at various times including:

- Now, if it has not been done before;
- When planning or making a change;
- After an incident (and/or near miss);
- At regular or scheduled intervals appropriate to the nature of the workplace and the hazard present; and
- When any legislative obligations change.

Risk assessments are to be recorded and kept in the applicable workplace.

To assess the potential risks associated with a hazard, the likelihood of an event happening and the severity of the potential consequences of the event, must be estimated. There are a number of factors that influence likelihood which are as follows:

- How often the task occurs;
- How many people are exposed;
- The duration of exposure;
- Quantities and materials or multiple exposure points involved;
- The position of the hazard relative to employees and to other hazards;
- The skills and competence of persons exposed;
- The experience of persons exposed;
- Any special characteristics of the people involved;
- Distractions;
- Environmental conditions;
- Repetition;
- Condition of equipment;
- The effectiveness of existing control measures.

The factors influencing consequences are as follows:

- Potential of "chain reaction";
- Concentration of substances;
- Volumes of materials;
- Speeds of projectiles and moving parts;
- Heights;
- Position of worker relative to the hazard;
- Weights;
- Forces and energy levels.

When a risk is assessed, a risk score and statement can be allocated and used to rank the risk in order of importance. Acute risks with a score of 4 are the highest importance and must be dealt with immediately; low risks with a score of 1 can be dealt with later. This information is recorded using the applicable documentation.

## 12. Risk Control Hierarchy

The risk control hierarchy to be used when determining the preferred risk control measures is as follows (in order):

1. Elimination of the hazard;
2. Substitution of material/equipment to reduce risk;
3. Isolation;
4. Engineering and redesign of the equipment or task;
5. Administrative measures (such as training, policies, signage); and
6. Personal protective equipment.

The control measures can be divided into 3 levels:

- The highest level includes measures that address the hazard at the source, or where it comes from (i.e. elimination, substitution);
- The second level measures intervene in the hazards course between the source and a worker (i.e. isolation or engineering);
- The third and lowest level measures are implemented at the point of the employee (i.e. administrative controls, personal protective equipment).

Elimination of the hazard completely is the most effective control and must always be attempted first when deciding on control measures. Other ways to eliminate a hazard at the source is by addressing safety issues during the design stage of processes. If the hazard cannot be eliminated, the above mentioned control measures from 2 – 6 should be implemented.

In many cases, it will be necessary to use a combination of measures to appropriately manage exposure to a risk.

### 13. Implementation of Risk Control Measures

The implementation of control measures is the responsibility of the relevant manager and may be actioned by relevant employees. The implementation of the selected control measures should adequately control the risks, not create other risks and enable employees to do their work without undue discomfort and distress.

Consultation with workers and others who may be affected by the risks in the workplace is essential during the risk management process and their opinions may be considered in the decision making process.

The implementation of control measure for a risk should be communicated to employees that may be affected by the new control measure. As required, training and instruction for employees on the new control measure will be provided. Supervisors are responsible for ensuring that the new control measures are implemented and used as planned and for correcting behavior where necessary.

Effective implementation will involve the development of an implementation plan. In addition, safe work procedures will be developed to ensure that both existing and new control measures are effective and management will inform employees about the types of control measures are implemented, how they will be implemented, and who will be involved in the implementation.

All employees must comply with the control measures and their implementation and management will enforce the control measures to ensure work procedures are followed and control measures are used appropriately.

### 14. Monitoring and Review of Risk Control Measures

The control measures implemented should be monitored and reviewed by the relevant manager and applicable staff with safety responsibilities at timeframes appropriate to the hazard and its associated risks.

When monitoring and reviewing the effectiveness of control measures, consideration should be given to whether the control measure is being used correctly, whether exposure to the assessed risks have been eliminated or adequately reduced, if the control measure has introduced any new problems, and if the control measure resulted in worsening the existing problem.

### 15. Reporting

#### 15.1. Risk Management Activities

A formal safety inspection of the site is to be undertaken annually in accordance with the applicable legislation. This inspection is to be coordinated by Guided Steps in conjunction with relevant parties. Formal safety inspections are to be recorded and provided to the President for consideration. All such reports are to be recorded in writing and filed in a secure location.



#### 16. Hazards and Incidents

All employees are to report the following to their direct supervisor immediately:

- All work related injuries and illnesses;
- Hazards;
- Near miss incidents which could have caused death, a serious bodily injury, and work related illness or a dangerous event as defined under the relevant legislation.

All such reports are to be recorded using the Incident Report and Incident Report Log, and filed in a secure location. Incidents will be reported to the relevant external regulatory authority in accordance with the relevant legislation.

#### 17. Workplace Harassment

The above mentioned responsibilities and risk management processes also apply to workplace harassment. An employee is subjected to workplace harassment if they are subjected to repeated behavior, other than behavior amounting to sexual harassment, by another person, including the employee's employer, co-worker, or group of co-workers that:

- Is unwelcome and unsolicited;
- The employee considers to be offensive, intimidating, humiliating, or threatening;
- A reasonable person would consider to be offensive, intimidating, humiliating, or threatening.

Workplace harassment does not include reasonable management action taken in a reasonable way by Guided Steps and/or its management or those in similar roles.

Although not an exhaustive list, the following are some of the more common types of harassment behavior:

- Abusing a person loudly, usually when others are present;
- Repeated threats of dismissal or other severe punishment for no reason;
- Constant ridicule and being put down;
- Leaving offensive messages on email or phone;
- Sabotaging a person's work, for example, by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages and get a person into trouble in other ways;
- Maliciously excluding and isolating a person from workplace activities;
- Persistent and unjustified criticism, often about petty, irrelevant or insignificant matters;
- Humiliating a person through gestures, sarcasm, criticism and insults, often in front of customers, management or other workers;
- Spreading gossip or false, malicious rumors about a person with an intent to cause a person harm.

Workplace harassment will not be tolerated by Guided Steps and all employees must ensure that they do not subject any person to workplace harassment.

The responsibilities and workplace health and safety risk management processes as set out above equally apply to workplace harassment and should be applied to prevent or control exposure to the risk of workplace harassment by following those processes.

Guided Steps is committed to providing employees with a healthy and safe work environment, free from workplace harassment. The effects of workplace harassment on a person may include:

- High levels of distress, impaired ability to make decisions and poor concentration;
- Loss of self-confidence and self-esteem and feelings of social isolation at work;
- Panic attacks, anxiety disorders, depression, social phobia and deteriorating relationships with family and friends;
- Reduced output and performance, incapacity to work, loss of employment;
- Sleep disturbances, such as insomnia or severe tiredness.

Employees are encouraged to report and should report any workplace harassment. Any allegations of workplace harassment will be treated seriously and investigated promptly and impartially.

#### 18. Manual Tasks

Manual tasks are those workplace activities requiring the use of force exerted by a person to grasp, manipulate, strike, throw, carry, move (lift, lower, push, pull), hold or restrain an object, or load. Manual tasks cover a wide range of activities including but not limited to stacking shelves, working in a loading dock, moving and stacking boxes of copy paper, etc.

Manual tasks can contribute to a number of muscular-skeletal disorders including:

- Sprains and strains of muscles;
- Injuries to muscles, ligaments, intervertebral disc injuries to soft tissue.

Risk factors associated with manual tasks fall into 3 different categories:

- Direct stressors – directly stress the body;
- Contributing risk factors – directly influence the task demands; and
- Modifying risk factors – can contribute to a further change in the impact of other risk factors.

To help in preventing or minimizing risk from manual tasks, employees:

- Should take part in activities to identify, assess and control the risks of muscular-skeletal disorders; and
- Must report to the employer or supervisor:
  - Problems with performance of the manual task;
  - Discomfort or symptoms that indicate there may be a problem with a task;
  - Problems with the maintenance of equipment.

The above mentioned responsibilities and workplace health and safety risk management processes apply to manual tasks and should also be applied to prevent or control exposure to the risks associated with manual tasks.

#### 19. Health Information

Guided Steps may direct employees to attend a health professional of its choice, to be treated for any workplace injury or illness, or to be examined for the purpose of ensuring that an employee is able to safely perform the requirements of their role and do not expose others to unreasonable risk of injury or illness. Furthermore, Guided Steps may seek information for a treating health professional or relevant insurer about a medical condition or past medical condition relating to an employee's work.

Employees returning to work from significant illness or injury must provide their manager medical clearance from their treating professional that is safe for them to return to work prior to resuming their responsibilities. Significant illness or injury includes conditions involving hospitalization or absences of five (5) or more working days.

An employee unable to undertake their full duties as a result of an injury or illness must provide suitable documentation from their health professional detailing these circumstances. Guided Steps will endeavor to collaborate with the employee and treating health professionals to ensure an employee is able to return to work in a safe and productive manner.

#### 20. Contractor, Visitor, and Volunteer Management

All contractors, visitors, and/or volunteers are to be instructed to report to the manager responsible for the area in which work is to be undertaken before commencement. The manager responsible for the work to be undertaken is to ensure the individual has received appropriate introduction and is adequately supervised.

The manager is to ensure that contractors conducting work are suitably licensed and hold the required permit to work where appropriate. Maintenance shall be conducted at a time when employees and patients will not be adversely affected by the maintenance activity. Management is to be made aware of contractors performing work which may expose employees and patients to risk.

All visitors to the workplace are to be recorded in the **Visitor Log** as being on the premises and when they have left the premises. Visits are to be escorted at all times by the person they are visiting.

**21. Security**

**21.1. Office Access**

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

**21.2. Access Badges**

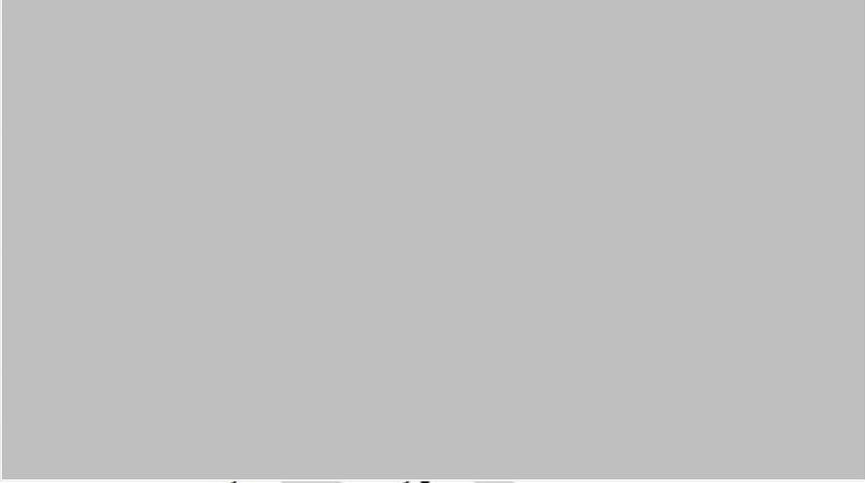
29 Del.C. Ch. 100 Freedom of Information Act

**21.3. Workplace Design**

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

**21.4. Standard Workplace Practices**

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



**21.5. Training**

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



**21.6. Opening and Closing Procedures**

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



**21.7. Cash Protection System**

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



21.8. Preparing Against a Robbery

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

21.8.1. 29 Del.C. Ch. 100 Freedom of Information Act

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

21.9. Procedures for After a Robbery

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

21.10. Trauma of a Robbery

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

21.11. Risk Assessment Checklist

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



**22. Breach**

Employees must comply with this policy at all times. If an employee is found to have breached this policy, they may be subject to disciplinary action in accordance with the applicable policy. The type and severity of disciplinary action will depend upon the circumstances of the case and the seriousness of the breach. In serious cases, this may include termination of employment.

**23. Records**

The original signed copy of this document is stored in the SOP 102: Safety and Security 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"/>





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

DRAFT











### Robbery Response Kit

#### Post-Robbery Checklist

After a robbery occurs, the following steps should be followed to ensure that no one in the facility has been injured, and to preserve evidence for law enforcement:

- Call law enforcement (usually 911 for local law enforcement). Be prepared to tell them that a robbery has just occurred, the address of the center, and any identification you can provide on the robber(s), vehicle(s) used and direction of escape.
- Contact the alarm monitoring station to confirm that the alarm was received, and to determine if law enforcement has been dispatched to the facility.
- Ensure that no one in the center needs medical attention. If anyone is injured, call for medical assistance.
- If possible, post a notice at the main entrance to the facility, to notify customers that the facility is temporarily closed, and to give the location of the nearest open facility.
- Station someone near the main entrance to wait for the police. Let no one into the facility except law enforcement.
- Give each witness (employees, volunteers, patients, caregivers, etc.) a description form to help them recollect what they saw, or give each witness a piece of paper to make notes about what they observed.
- If customers insist on leaving, get their names and phone numbers to share with law enforcement, if needed.
- Protect any areas that the robber(s) touched visited to preserve any fingerprints or any footprints they might have left.

Complete the Robbery Description Form immediately after a robbery and before you compare notes with anyone else. Describe or circle only those items you are sure of. Use the blank figure to draw in hard-to-describe details such as patterns of clothing and/or location of scars. Please provide additional copies of this form for each robber.

Guided Steps Compassion Center

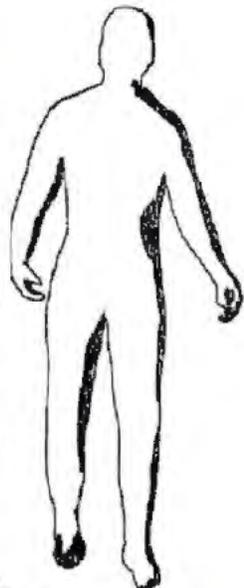
Robbery Response Kit

**Robbery Description Form**

Date of Robbery:		Time of Robbery:			
Company Name:					
Address:					
Phone:					
Your Name:					
Home Address:					
Phone:					
Position:					
Signature:			Date/Time:		
SPEECH:	Loud	Soft	Lisp	Slow	High-Pitched
	Refined	Rapid	Nasal	Deep	Stutter
	Other: (describe):				
ACCENT:	Local	Eastern	Southern	Western	Foreign
	Other (describe):				
WEAPON:	Semiautomatic Pistol	Revolver	Knife	Rifle	
	Automatic Rifle	Submachine Gun	Shotgun	Sawed-Off Shotgun	
	COLOR:	Black	Shiny	Other:	
DESCRIBE WEAPON					
ROBBERY DETAIL	Did robber use a note?	Yes	No		
	Did you retain note?	Yes	No		
	If you were unable to keep the note – what did it say?				
	If robber spoke – what did he or she say?				
	Did the robber have an accomplice you were aware of?	Yes	No		
ROBBER'S ESCAPE	Don't Know	On Foot	Car	Other Vehicle	
	Type of Vehicle:				
ESCAPE VEHICLE	Make:	Model:			
	Color:	Year:			
	License Plate Number:				
	Number of Other Passengers in Vehicle:				
	Direction Taken:				

Guided Steps Compassion Center

Robbery Response Kit

HEIGHT:	WEIGHT:	RACE:			APPARENT AGE:	
SEX:	Male	Female			 <p>Please use the blank figure to draw in any hard-to-describe details such as patterns of clothing or location of scars.</p>	
COMPLEXION	Sallow	Lig	Ruddy	Freckl		Dark
HAIR COLOR:	Blonde	Red	Brown	Gray		Black
	Partially Gray		Other:			
FACIAL HAIR	Beard	Unshaven		Moustache		
	None					
HAIR STYLE:	Long	Short	Medium			
	Bald	Wig	Straight			
	Medium	Curly	Partially Bald			
EYEBROWS:	Bushy		Thin			
	High Over Eyes		Low Over Eyes			
EYES:	Large	Wide Set	Small			
	Close Together	Pouches	Deep Set			
	Droopy					
EYE COLOR:	Blue	Gray	Hazel			
	Brown	Black				
NOSE:	Small	Large	Long			
	Short	Thin	Wide			
TEETH:	Straight	Crooked	Buck			
	Discolored	Some Missing				
CHIN:	Long	Square	Receding			
	Prominent					
EARS:	Small	Prominent				
MASK:	Yes	No				
HANDS:	Right-handed	Left-handed				
CLOTHING: Circle items and describe:	Suit:				Gloves:	
	Jacket:				Hat:	
	Sweater:				Shoes:	
	Slacks:				Overcoat:	
	Skirt or Dress:				Raincoat:	
	Tie:				Windbreaker:	
Belt Buckle:						
Other Marks and Characteristics: Describe any other personal characteristics such as scars, tattoos, birthmarks, limp, twitch, deformities, amputations, or any jewelry such as a watch, ring, necklace, earring, etc., that the robber wore:						

