

Agenda

Economic Development Corporation

Board of Directors

City of Kalamazoo



Thursday, May 18, 2023

7:45 AM

CPED Main Conference Room - 245 N. Rose Street, Suite 100

A. CALL TO ORDER/ROLL CALL

B. ADOPTION OF FORMAL AGENDA

C. APPROVAL OF MINUTES

1. Approval of the minutes from the meeting of the Economic Development Corporation on May 4, 2023 (**Action: Motion to Approve. Voice Vote.**)

D. PUBLIC COMMENTS

E. DIRECTORS' COMMENTS

F. NEW BUSINESS

1. Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Adult Use Processor Marijuana Business Permit for 3300 Miller Road LLC. (**Action: Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Adult Use Processor Marijuana Business Permit for 3300 Miller Road LLC) - Roll Call Vote**
2. Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Adult Use Retailer Marijuana Business Permit for Refine Michigan Co DBA The Refinery. (**Action: Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Adult Use Retailer Marijuana Business Permit for Refine Michigan Co DBA The Refinery) - Roll Call Vote**
3. Approval of a recommendation to the City Clerk a 90-day probationary approval of the & Adult Use Retailer Marijuana Business Permit for Redbud Roots Lab VI, Inc DBA Redbud Roots and GLH (**Action: Approval of a recommendation to the City Clerk a 90-day probationary approval of the Adult Use Retailer Marijuana Business Permit for Redbud Roots Lab VI, Inc DBA Redbud**

Roots and GLH) - Roll Call Vote

- G. UNFINISHED BUSINESS**
- H. COMMUNICATIONS AND ANNOUNCEMENTS**
- I. STAFF REPORTS AND UPDATES**
- J. ADJOURNMENT**

**CITY OF KALAMAZOO
ECONOMIC DEVELOPMENT CORPORATION BOARD MEETING
SPECIAL MEETING
Thursday, May 4, 2023
Community Planning and Economic Development
245 N. Rose Street, Kalamazoo, MI 49007**

MEMBERS PRESENT: Nathan Bolton; Kevan Hess; Andrew Schipper; Lucas Middleton; Sharon Ferraro; Rachel Bair; Qianna Decker; Kyle Gulau

MEMBERS ABSENT: Jason Novotny; Torean Greeley; Michael Gurnee

CITY STAFF PRESENT: Jamie McCarthy (Sustainable Development Coordinator); PJ Thuringer (Economic Development Supervisor); Logan Mulholland (Envirologic, Consultant); Jared Chambers (Business Specialist); Beth Cheeseman (Executive Administrative Assistant); Jessica Wood (Attorney, Dickinson Wright); John Weiss (Attorney, Dickinson Wright)

Meeting was called to order at 7:45 AM by Chair Bolton.

MOTION TO EXCUSE ABSENT MEMBERS: Director Gulau moved to excuse absent members; seconded by Commissioner Decker. Motion approved by voice vote unanimously.

APPROVAL OF AGENDA: Director Ferraro moved the approval of the agenda as presented; seconded by Director Hess. Motion approved by voice vote unanimously.

APPROVAL OF MINUTES: Director Middleton moved the approval of the minutes from the meeting of March 16, 2023; seconded by Director Bair. Motion approved by voice vote unanimously.

PUBLIC COMMENTS

None.

DIRECTORS' COMMENTS

None.

NEW BUSINESS

1. Approval of a recommendation to the City Clerk for a 90-day probationary approval of the Medical Provisioning & Adult Use Retail Marihuana Business Permit for AEY Capital, LLC dba Gage (Action: Approval of a recommendation to the City Clerk for a 90-day probationary approval of the Medical Provisioning & Adult Use Retail Marijuana Business Permit for AEY Capital, LLC dba Gage).

Mr. Thuringer announced that new attorneys, Jessica Wood, and John Weiss from Dickinson Wright, were present at the meeting. He welcomed them and Attorney Wood gave a short introduction.

Mr. Thuringer stated that both renewals that day were from the same parent company. Gage is located on Stadium Drive. This location employs 10 people. They offer benefits and pay a living wage. Mr. Thuringer reported that Gage has donated to Loaves and Fishes, Prevention Works, and participated in can and clothing drives. They have also supported state-wide programs like Last Prisoner Project, and they have a grant program through their Social Equity initiative. He stated that Gage was not in default with the City. They ban the box on their applications. Four of their employees live in the City, but none of them are from qualified census tracts. Mr. Thuringer explained that Gage plans on mandating full addresses on their applications to begin to track that information. They offer continuous training throughout the year. Gage qualified for Gold Certification through the Michigan CRA. That makes them eligible for two-year renewal. Unfortunately, they have a zoning violation because a retaining wall failed. Staff and the Cannabis Committee are recommending a 90-day probationary period so they can get that repaired.

Commissioner Decker thought they had a robust plan and offered a lot of benefits. She asked what economic benefit they foresaw for the year. Mr. Jake Thornton, from Gage and Cookies, said they were planning to do a lot of what did in 2022 plus additional things. Mr. Thornton said it had been a tough year for cannabis in Michigan. They are going to continue outreach, but thought it was important to keep people employed. Commissioner Decker asked if the \$5,000 in donations to Edison and Eastside was a combined total or if each neighborhood got that amount. Mr. Thornton thought it was a combined total, but he could check on that. Commissioner Decker saw they supported Midwestern in the Detroit area and wondered if they supported anything comparable in Kalamazoo. Mr. Thornton said they are not. Their focus for the year in Kalamazoo will be to reach out to neighborhood associations and increase employment from the qualified census tracts. Commissioner Decker encouraged him to be in contact with the City Manager's Office if they would like to join in neighborhood meetings already scheduled.

Director Middleton asked if 90 days would be enough to repair the failing retaining wall. Mr. Thornton said they are in process of changing engineering firms, but he believes they can get it done in 90 days. He indicated that if that changes, he will be in communication with them. Director Middleton asked staff what would happen if Gage was unable to complete repairs but had made significant effort. Mr. Thuringer said they would need to talk to the attorneys, but they have been clear about the 90 days. He thought they might be able to work with them if they are making significant progress.

Director Bolton asked Mr. Thornton to clarify why it had been a tough year for marijuana businesses. Mr. Thornton said there was an abundance of supply with little growth in demand. He said that many larger companies had gone into receivership in the last few months. Mr. Thornton said they have no plans to go into receivership.

Director Hess moved approval of a recommendation to the City Clerk for a 90-day probationary approval of the Medical Provisioning & Adult Use Retail Marijuana Business Permit for AEY Capital, LLC dba Gage; seconded by Director Ferraro.

A roll call vote was taken, and the motion passed unanimously.

2. Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Medical Provisioning & Adult Use Retail Marijuana Business Permit for Thrive Enterprises, LLC dba

Cookies Kalamazoo. (Action: Approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Medical Provisioning & Adult Use Retail Marihuana Business Permit for Thrive Enterprises, LLC dba Cookies Kalamazoo).

Mr. Thuringer said that Cookies employs 12 people. They pay a living wage, have full medical benefits and a 401K. Cookies donated to Loaves and Fishes, Prevention Works, Last Prisoner Project, and had a grant program through their Social Equity initiative. He reported that Cookies is not in default with the City. They do not have any employees from qualified census tracts, but they plan to work on that this year. Cookies qualified for a Gold Certification through the Michigan CRA. Mr. Thuringer stated that the Cannabis Committee was concerned there were not as many City resident employees as they would like. They recommended a one-year renewal. City staff felt that was somewhat arbitrary. Cookies has reported that 50% of their employees at this facility live within the City. Staff are recommending a two-year renewal.

Director Bolton asked if the Cannabis Committee was working on policy regarding a percentage of employees being City residents. Mr. Thuringer reported that staff is working on that policy. He said they want a year's worth of data to evaluate in order to have that discussion with staff, the Cannabis Committee, and the Board.

Director Hess asked if it was the first time there was a dispute on a two-year renewal. Mr. Thuringer agreed that it was and said he appreciates how the Cannabis Committee challenges things in order to make these businesses the best they can be for the City.

Director Middleton noted that 50% of this facility's employees live in the City. He requested clarification if the concern was regarding residents from qualified census tracts. Mr. Thuringer said it was just regarding City residents. Director Bolton noted that businesses are struggling to find employees right now. He wondered what the average City resident employee percentage would be for other businesses. Commissioner Decker was concerned about requiring someone to live in the City when there may not be housing available that is affordable for them.

Commissioner Decker moved approval of a recommendation to the City Clerk to Approve the 2-year renewal of the Medical Provisioning & Adult Use Retail Marihuana Business Permit for Thrive Enterprises, LLC dba Cookies Kalamazoo; seconded by Director Middleton.

A roll call vote was taken, and the motion passed unanimously

UNFINISHED BUSINESS

1. Approval of a recommendation to the City Clerk to Approve the 1-year renewal of the Adult Use Marijuana Business Permit for WTOG, LLC DBA Rair. (Action: Approval of a recommendation to the City Clerk to Approve the 1- year renewal of the Adult Use Marijuana Business Permit for WTOG, LLC DBA Rair).

Mr. Thuringer reminded them that Rair was given a 90-day probationary renewal to allow them to get a pending personal property tax statement filed and approved. He reported that staff received documentation that was completed. Mr. Thuringer asked the Board to approve the one-year renewal.

Director Ferraro moved approval of a recommendation to the City Clerk to Approve the 1- year renewal of the Adult Use Marihuana Business Permit for WTOG, LLC DBA Rair; seconded by Commissioner Decker.

A roll call vote was taken, and the motion passed unanimously.

COMMUNICATIONS AND ANNOUNCEMENTS

Mr. Thuringer introduced Mr. Jerrid Burdue as the Neighborhood Business and Special Projects Coordinator.

STAFF REPORTS AND UPDATES

1. Cannabis Committee

1. Resignation of Jason Novotny from EDC Cannabis Committee

Mr. Thuringer announced Director Novotny's resignation from the Cannabis Committee due to work commitments. He asked Directors to consider joining the committee. He reported that the virtual meetings are at 7:30am on the second Tuesday of the month.

Director Bolton noted that they could consider it and discuss that at a later meeting.

2. Committee Update

Mr. Thuringer said they are in the process of putting together an RFP for a Cannabis Chamber of Commerce with a focus on Social Equity. He said they get 25% of taxes on cannabis that the City receives to put toward Social Equity concerns. Mr. Thuringer said they would cover the following areas: education, work force development, youth work force development, SPK neighborhood micro home business development, neighborhood blight initiatives, cannabis business retention services, and college tuition reimbursement programs. He thought the RFP should be completed in the next 60 days. He invited them to watch a presentation at the COW meeting on May 15.

Director Middleton thanked staff for organizing the special meeting and for the Directors attendance.

ADJOURNMENT: 8:14 AM

Signature

Name/Title

Signature

Name/Title

INTER-OFFICEMEMO

To: The Economic Development Corporation Board of Directors

From: Paul Thuringer, Economic Development Supervisor
Jared Chambers, Business Specialist

Date: May 15, 2023

Re: Adult Use Retailer Permit Renewal for 3300 Miller Road LLC

The City Clerk's Office has requested that the Economic Development Corporation (EDC) Board of Directors evaluate the *Marihuana Facility Permit Renewal Application* submitted by 3300 Miller Road LLC for its facility at 3300 Miller Road and that the EDC Board provide a recommendation regarding the renewal of this permit.

BACKGROUND

On June 20, 2022, the City Clerk issued an Adult Use Retailer Permit to 3300 Miller Road LLC, the applicant, for its facility at 3300 Miller Rd. This City Operating Permit is set to expire on June 19, 2023 and must be renewed before that date for the facility to continue operating. The applicant has submitted the required renewal application and the annual permit fee. City ordinance requires that the Economic Development Corporation review the renewal application and provide a recommendation. Below is the ordinance language that describes the specific role and responsibilities of the EDC in this process:

Sec. 20B-12

C. In determining whether to grant a renewal of a permit, the members of the City's Economic Development Corporation board will evaluate the permit holder's compliance with the statements it provided with its initial application and submission with its request for renewal of the following information:

1. The Staffing plan for the business which describes the actual number of employees, including the number and type of jobs that the facility has created, and the amount and type of compensation (including benefits) paid for such jobs;
 - They have 12 full-time employees and 1 part-time.
 - The hourly wages range from \$14-\$30/hr.
 - Full-time employees have health insurance options, as well as the opportunity for Paid Time Off after 2 years of employment.
2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the business, results of efforts for community outreach and worker training programs;
 - 3300 Miller Road has been successful in adding 13 employees to its staff over the last nine months of operations.
 - 9 of the current employees are residents of Kalamazoo City.
 - They match donations from The Refinery, and donate to the following

Kalamazoo Organizations:

- Douglass Community Association \$500/month
- Urban Alliance \$500/month
- Synergy Health Center \$600/month
- Black Wall Street Kalamazoo \$500/month
- Loaves and Fishes \$200/month

3. An explanation, with supporting factual data, of the efforts and success achieved by the social equity plan of the business to promote and encourage participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement, and the positive impact of the social equity plan on local residents;
 - Two members of their team were able to participate in an ERACCE workshop, which is a local organization helping to eliminate racism in our community. They plan to continue with another workshop in the coming year.
 - They currently have six women employees, including 4 in supervisor positions, one of whom is a woman of color. They have six male employees, including 1 man of color.
- 4 A statement that the business is not in default to the City for any property tax, special assessment, utility charges, fines, fees, or other financial obligation owed to the City;
 - They are in good standing with the City.
- 5 A statement that the hiring and public accommodation practices of the facility conform to the City's Nondiscrimination Ordinance provisions and documentation of the total number of employees broken out by managerial and operational employees, number of women, and number of minority employees and number of employees disproportionately impacted by marihuana prohibition and enforcement.
 - They've confirmed that their hiring and public accommodations practices conform to the City's anti-discrimination ordinance provisions.
 - They 'Ban the Box' when it comes to new employee applications.
6. A statement, with supporting documentation, providing answers to the following questions:
 - a. How many City residents do you currently employ?
 - 9 employees
 - b. How many current employees reside in Census Tracts 1 (Eastside); 9, 10 (Edison), and/or 2.02,3 (Northside)?
 - 2 employees from the Edison Neighborhood
 - c. What is your plan to employ residents of the identified census tracts?
 - Positions are posted via various employment-seeking Sites.
 - Their application states that all people are encouraged to apply, including individuals with previous convictions and people of color.
 - They have a relationship with 2 non-profits in the Northside and works with employees via the organization.

- d. How many of your employees have prior marihuana convictions (excepting a conviction for delivery or distribution to a minor)?
 - Currently, no employees have prior marihuana convictions.
 - e. What is your plan for employees with a prior marihuana conviction to move up within your business and/or the marihuana industry?
 - Most of their employees are promoted from within. All employees are given the opportunity to grow with the company, regardless of background. They prioritize their work ethic and abilities. When a new position becomes available, all employees are eligible to apply.
7. Proof that the marihuana business has received recognition and maintains the status as a Silver Level Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency.
- In January 2023, they became Gold Level Certified.

Please see the attached Marihuana Renewal Application Checklist that verifies that this business has met all the requirements for renewal. This checklist was completed by City staff to verify if all requirements of the ordinance have been met. The City Clerk has verified that the applicant has no outstanding financial obligations to the City, there have been no complaints to the City Manager regarding compliance with the City's anti-discrimination ordinance, and the facility has passed its City Fire & Zoning inspections. The applicant has met all the requirements for renewal.

RECOMMENDATION

Staff recommends that the EDC Board recommend to the City Clerk's Office 2-year approval of the Adult Use Processor Permit to 3300 Miller Road LLC.

ATTACHMENTS

3300 Miller Road LLC Renewal Application Attachments (Staffing Plan) and (Community Benefits Statement), and (Social Equity Plan) from the applicant.

Marihuana Renewal Application Checklist for:

3300 Miller Rd, LLC**330 Miller Rd**

Contact: Tom Farrell

farrellt@refinemi.com**Type: Adult Use Processor**

	Date Received	Received By	Comments	
Renewal Application Received	2/20/2023	Scott Borling		
Inspection Type:	Inspection Date	Completed by:	Satisfactory?	Notes
Zoning Inspection	3/28/2023	Pete Eldridge	Yes	
Fire Inspection	3/28/2023	Scott Brooks	Yes	
	Date	Name	Comments	
Business Community Benefits Check-In	3/29/2023	Jared Chambers		
	Invite Sent	EDC Meeting Date		
Invite to EDC Meeting		5/18/2023		
	Full-Time	Part-Time	Comments	
Jobs Created				
	Yes/No	Comments:	Verified by:	
Any Past Due Financial Obligations with City? (i.e. taxes owed, fees, fines, etc)	No		Andrew Falkenberg	
Silver Level Social Equity All-Star or better status with the Michigan Cannabis Regulatory Agency	Gold			
Attachments	Staffing Plan	City Economic Benefits Plan	Social Equity Plan	Handbook
	Yes	Yes	Yes	N/A

All Items Complete Yes

MARIHUANA BUSINESS PERMIT RENEWAL APPLICATION

Pursuant to Chapter 20B of the Kalamazoo City Code

**City of Kalamazoo
Office of the City Clerk
241 West South Street
Kalamazoo, MI 49007**

(Please Print)

BUSINESS INFORMATION (The entity that is licensed by the state and that holds a City MMF permit)

Official Business Name 3300 Miller Road LLC

Business Address 3300 Miller Road

City Kalamazoo State MI Zip Code 49001 Business Phone 269-760-0841

Business E-mail erin@refinemi.com Business Website N/A

TYPE OF PERMIT BEING RENEWED

Medical

Grower:

☐ Class A (500 plants)

☐ Class B (1,000 plants)

☐ Class C (1,500 plants) No. of Class C Permits _____

☐ Processor

☐ Safety Compliance

☐ Provisioning Center

☐ Secure Transporter

Adult Use

Grower:

☐ Class A (100 plants)

☐ Class B (500 plants)

☐ Class C (2,000 plants) No. of Class C Permits _____

☐ Excess Grower

☒ Processor

☐ Safety Compliance

☐ Microbusiness

☐ Retailer

☐ Secure Transporter

☐ Designated Consumption Lounge

FACILITY INFORMATION

Property Address 3300 Miller Road Kalamazoo, MI 49001

Real Property Parcel Number 39-06-25-405-001

Advertised Facility Name 3300 Miller Road LLC

Manager - Full Name Thomas Farrell

CONTACT INFORMATION [the primary point(s) of contact for this application]

Name Erin Farrell

Address 3300 Miller Road City Kalamazoo State MI Zip Code 49001

Phone 269-760-7654 E-mail erin@refinemi.com

Name Thomas Farrell

Address 3300 Miller Road City Kalamazoo State MI Zip Code 49001

Phone 269-760-0841 E-mail tpf@refinemi.com

ATTACHMENTS

Please attach the following as separate documents to this application:

1. The attached Staffing Plan worksheet and any additional pages that provide a description of the actual number of employees, including the number and type of jobs that the licensed facility has created, and the amount and type of compensation (including benefits) paid for such jobs; and
2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the facility; the results of community outreach efforts; and worker training programs.
3. A social equity plan that: (a) promotes and encourages participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement; and (b) positively impacts local residents.
4. Documentation that indicates your business qualifies as a Silver Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency. **A marihuana business must meet this qualification to be eligible for permit renewal with the City of Kalamazoo.**

The City's Economic Development Corporation will use the information provided in these documents to evaluate the permit holder's compliance with the statements it provided with its initial application (specifically the representations made in Attachment G – Staffing Plan and Attachment H – Community Benefits Statement).

Please complete the following certifications:

- ☒ The permitted facility is not in default to the City for any property tax, special assessment, utility charges, fines, fees or other financial obligation owed to the City.
- ☒ The hiring and public accommodation practices of the permitted facility conforms to the City's anti-discrimination ordinance provisions.
- ☒ I consent to an inspection of the permitted premises as required by ordinance to ensure the premises and its systems are in compliance with the requirements of Chapter 20B of the Kalamazoo City Code.
- ☒ I understand that renewal of a City Operating Permit is contingent on renewal of the State Operating License for this facility.

I hereby certify under the penalty of perjury that the statements made in this application, including all attachments thereto, are true. I further certify that I am an officer, director, or managerial employee of the applicant or a person who holds a direct or indirect ownership interest in the applicant.

Applicant Signature: _____

Date: _____

Name (printed): Erin Farrell

Position: Treasurer

STAFFING PLAN

Summary

Please indicate the number of employees who work at the licensed facility:

Full-time employees (32+ hours per week) 12 Part-time employees (< 32 hours per week) 1

Position Types and Compensation

Please provide a description of the types of jobs the licensed facility has created, along with the amount of compensation and benefits paid for such jobs:

Position Title: General Manager Annual Average Compensation \$ 30 per hour

How many people are employed in this position at the licensed facility? 1

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Supervisor Annual Average Compensation \$ 24 per hour

How many people are employed in this position at the licensed facility? 2

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Packagers Annual Average Compensation \$ 14 per hour

How many people are employed in this position at the licensed facility? 6

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Metric Team Annual Average Compensation \$ 16 per hour

How many people are employed in this position at the licensed facility? 3

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Graphic Designer Annual Average Compensation \$ 24-25 per hour

How many people are employed in this position at the licensed facility? 1

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Please provide information on any benefits other than health insurance that are offered to all employees:

N/A

Attach additional pages as necessary.

STAFFING PLAN

Compliance with Social Equity Policy

1. How many of your current employees reside in the following Census Tracts:

Census Tract 1 (Eastside Neighborhood) 0

Census Tracts 9 and/or 10 (Edison Neighborhood) 2

Census Tracts 2.02, and/or 3 (Northside Neighborhood) 0

2. What is your plan to employ residents of the identified Census Tracts?

Introductory positions are posted via various employment seeking sites. The application states that all people are encouraged to apply, including individuals with previous convictions and people of color. In addition, 3300 Miller Road LLC has a relationship with 2 non-profits in the Northside and works to get employees via these organizations. 3300 Miller Road LLC is intentional this year in their donations to create new relationships in these neighborhoods and cultivate a presence in the community.

Attach additional pages as necessary.

3. How many of your employees have prior marihuana convictions or expungements (excepting a conviction for delivery or distribution to a minor)?

Number of employees with marihuana convictions 0

4. What is your plan for employees with a prior marihuana conviction to move up within your business and/or the marihuana industry?

The majority of our employees are promoted from within. All employees are given the opportunity to grow with the company, regardless of background. We prioritize their work ethic and abilities. When a new position becomes available, all employees are eligible to apply.

Attach additional pages as necessary.

3300 Miller Road LLC has been operating for nearly 1 year. Over the year, we have been able to grow quickly with the help of our retail location, Refine Michigan Co., and our grow operation which is located in Paw Paw, MI. Because of this positive growth and support from these locations, we have the resources to offer our employees' health insurance. Currently, we offer our full-time employees health insurance options, as well as opportunity for Paid Time Off. Employees eligible for this Paid Time Off must have worked for us for two years. As indicated in our Staffing Plan Summary, we currently employ 13 people, and we deliberately sought to hire applicants who are not only Kalamazoo residents, but also represent a diverse cross section of the community. We currently employ 6 females, 2 of whom are in management positions. We also employ 6 males. Twelve of our employees are currently working full time. The other qualified candidates we hired are working at the Refinery as a second job, or they are only available for up to 25 hours per week due to other commitments (e.g., family, school, etc.).

As noted in the attached staffing plan, we have 2 employees residing in the Edison neighborhood. Our current plan to employ these residents is based on our job postings. We have postings on various employment seeking sites. The application states that all people are encouraged to apply, with emphasis on people of color and those disproportionality impacted by cannabis regulations. In addition, Refine Michigan Co, has ties to community organizations in these neighborhoods, and have previously sought employees from these organizations. We will continue to do so as the demand and opportunity are available.

Economic Benefits to City of Kalamazoo by 3300 Miller Rd LLC

- 3300 Miller Road has been successful in adding 13 employees to its staff over the last nine months of operations. We have 6 women employees, including 2 in supervisor positions. We have 6 male employees. 75% of our current employees are residents of Kalamazoo City, and 90% from within Kalamazoo County.
- Our current hiring practices aim to hire local employees using websites like Indeed. We have also reached out to several City Council members to help in our search for people of color and those that have been disproportionality affected by marihuana prohibition and enforcement.
- 3300 Miller Road LLC buys from and supports fellow Kalamazoo businesses whenever possible for sourcing everything from products and services. We also try and support other Michigan (locally owned) businesses when buying outside Kalamazoo proper. Here are just a few examples:
 - We hired a Portage area contractor and Kalamazoo subcontractors to renovate our facility.
 - We use a Portage area CPA for our book keeping.
 - We often make purchases at shops in town, such as Office Depot or Lowes rather than purchasing from Amazon
 - We regularly buy our employees breakfast, lunch, or snacks from local restaurants, including Godfather's Pizza, Water Street, and Sweet Water.
 - We use local drinking water delivery services
 - We use Kalamazoo local security services
- 3300 Miller Road plans to combine efforts with The Refinery in 2023, and begin supporting local charitable causes. We plan to match donations from The Refinery, and donate to similar non-profits, including Douglass Community Association, Black Wall Street Kalamazoo, Urban Alliance, Synergy Health Center, and Redemption's Last Prisoner Project.
- Two members of the team were able to participate in an ERACCE workshop, which is a local organization helping to eliminate racism in our community. They plan to continue with another workshop in the coming year.

Social Equity Plan

3300 Miller Road LLC is a family-owned business, committed to serving and improving Kalamazoo and the surrounding communities. 3300 Miller Road LLC is also committed to sustainable, environmentally friendly development, and encouraging environmental conservation.

3300 Miller Road LLC strives to hire local labor, pay fair wages well above the State minimum wages, and provide healthcare, PTO, and other benefits to its workers. 3300 Miller Road LLC is also committed to hiring those who have been disproportionately impacted by marijuana prohibition and enforcement. Where possible, 3300 Miller Road plans to work with properly licensed local suppliers and contractors for construction, business services, and the acquisition of products. 3300 Miller Road LLC is proud to support other local businesses and its community.

Furthermore, 3300 Miller Road LLC is committed to hiring and maintaining a diverse, multi-ethnic, and multi-cultural workforce that is reflective of the communities in which it operates and the nation at large. Not only do we prioritize diversity across race, gender, and ethnicity in our hiring, but we also prioritize hiring within communities that have been disproportionately impacted by cannabis criminalization, including those who carry permissible convictions within the LARA/CRA and State of Michigan hiring requirements.

When hiring for the processor, 3300 Miller Road LLC targeted City of Kalamazoo residents when seeking applications. Because the City of Kalamazoo is a disproportionately impacted community, we strive to hire community workers, most specifically, we are intentional in hiring individuals that are persons of color, and those that have been disproportionately affected by marijuana prohibition and enforcement. These individuals are highly encouraged to apply to all open positions. Currently we ‘Ban’s the Box’ when it comes to new employee applications. Since the retail location has opened, 3300 Miller Road LLC has kept a diverse team across all levels of the company.

We foster an inclusive culture that is organized around employee engagement, individual responsibility, and individual empowerment to express diverse opinions and perspectives, all aligned with the Company’s core vision to empower the health and wellness of those around us.

We currently have six women employees, including 4 in supervisor positions, one of whom is a woman of color. We have six male employees, including 1 man of color. 75% of our current employees are residents of Kalamazoo City, and 90% from within Kalamazoo County.

We look forward to continued service to the community as our operations grow.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

January 23, 2023

3300 Miller Road LLC
3300 Miller Rd
Kalamazoo, MI 49001

The Cannabis Regulatory Agency's social equity team reviewed your form for the Social Equity All-Star Program and would like to congratulate you on your acceptance into the program at the gold level. The following license numbers will be displayed on our website under the gold level. These license numbers were provided on your form:

- AU-P-000278

Now that you have been accepted into the Social Equity All-Star Program here are some important things to know:

- You are being awarded a digital copy of your Social Equity All-Star Program gold seal. Feel free to use this seal on your website, social media, or in your licensed establishment(s) in any way that makes sense to highlight the establishment's efforts.
- Acceptance into this program is only valid for one year. In order to remain active in the program you will need to submit a Social Equity All-Star Program Renewal form each year you want to participate.
 - If at any time you would like to update your plans on the CRA website, you can email us your updated plan along with the [Social Equity All-Star Program Amendment form](#).

If there are any questions regarding this acceptance letter, please contact the social equity team via email at CRA-SocialEquity@Michigan.gov.

Thank you,

Social Equity Representative
Cannabis Regulatory Agency
www.michigan.gov/CRA

INTER-OFFICE MEMO

To: The Economic Development Corporation Board of Directors

From: Paul Thuringer, Economic Development Supervisor
Jared Chambers, Business Specialist

Date: May 15, 2023

Re: Adult-Use Retailer Permit Renewal for Refine Michigan Co.

The City Clerk's Office has requested that the Economic Development Corporation (EDC) Board of Directors evaluate the *Marihuana Facility Permit Renewal Application* submitted by Refine Michigan Co. for its facility at 3650 Alvan Road and that the EDC Board provide a recommendation regarding the renewal of this permit.

BACKGROUND

On July 5th, 2022, the City Clerk issued an Adult-Use Retailer Permit to Refine Michigan Co., the applicant, for its facility at 3650 Alvan Road. This City Operating Permit is set to expire on July 4th, 2023, and must be renewed prior to that date for the facility to continue operating. The applicant has submitted the required renewal application and the annual permit fee. City ordinance requires that the Economic Development Corporation review the renewal application and provide a recommendation. Below is the ordinance language that describes the specific role and responsibilities of the EDC in this process:

§ 20B-12

C. In determining whether to grant a renewal of a permit, the members of the City's Economic Development Corporation board will evaluate the permit holder's compliance with the statements it provided with its initial application and submission with its request for renewal of the following information:

1. The Staffing plan for the business which describes the actual number of employees, including the number and type of jobs that the facility has created, and the amount and type of compensation (including benefits) paid for such jobs;
 - The Refinery employs 21 people.
 - 3 Receptionists, \$14/hour
 - 8 Budtenders, \$15/hour
 - 8 Managers, \$20-25/hour
 - 1 Treasurer, \$65,000 yearly salary
 - 1 General Manager, \$70,000 yearly salary
 - They offer their full-time employees health insurance options, as well as the opportunity for Paid Time Off. Employees eligible for this Paid Time Off must have worked there for two years. As the business has been in operation for almost 4 years, many employees are eligible and coming eligible in the next few months.

2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the business, results of efforts for community outreach and worker training programs;
 - The Refinery and 3300 Miller Rd LLC anticipates paying over \$1,100,000 annually to employees who reside in and spend money in the City of Kalamazoo.
 - They match donations from 3300 Miller Rd LLC, and donate to the following Kalamazoo Organizations:
 - Douglass Community Association \$500/month
 - Urban Alliance \$500/month
 - Synergy Health Center \$600/month
 - Black Wall Street Kalamazoo \$500/month
 - Loaves and Fishes \$200/month
 - During the 2022 Holiday season, The Refinery was able to help donate nearly 6,000 pounds of food to the local Loaves & Fishes with the help of their customers and employees.
 - They have also donated to the local Fraternal Order of Police. In addition to donations, they have hosted events with KAR (Kalamazoo Animal Rescue) to encourage the adoption of local dogs and cats.
3. An explanation, with supporting factual data, of the efforts and success achieved by the social equity plan of the business to promote and encourage participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement, and the positive impact of the social equity plan on local residents;
 - They have 13 women employees, including 7 in supervisor positions, and 2 women of color. They have 8 male employees, including 4 men of color, and 3 of them are in supervisor positions. 80% of their current employees are residents of Kalamazoo City.
 - They have reached out to several City Council members to help in their search for people of color and those that have been disproportionality affected by marihuana prohibition and enforcement
4. A statement that the business is not in default to the City for any property tax, special assessment, utility charges, fines, fees, or other financial obligation owed to the City;
 - They are in good standing with the City.
5. A statement that the hiring and public accommodation practices of the facility conform to the City's Nondiscrimination Ordinance provisions and documentation of the total number of employees broken out by managerial and operational employees, number of women, and number of minority employees and number of employees disproportionately impacted by marihuana prohibition and enforcement.
 - They've confirmed that their hiring and public accommodations practices conform to the City's anti-discrimination ordinance provisions.
 - They 'Ban the Box' when it comes to new employee applications.
6. A statement, with supporting documentation, providing answers to the following questions:
 - a. How many City residents do you currently employ?
 - 17 employees

- b. How many current employees reside in Census Tracts 1 (Eastside); 9, 10 (Edison), and/or 2, 3 (Northside)?
 - They employ 3 Eastside Neighborhood residents and 2 Edison Neighborhood residents.
 - c. What is your plan to employ residents of the identified census tracts?
 - Their application states that all people are encouraged to apply, emphasizing people of color and those disproportionately impacted.
 - The Refinery also has ties to community organizations in these neighborhoods and has sought employees from these organizations.
 - d. How many of your employees have prior marijuana convictions (excepting a conviction for delivery or distribution to a minor)?
 - They have 3 employees with previous marijuana convictions, one of whom is a manager.
 - e. What is your plan for employees with a prior marijuana conviction to move up within your business and/or the marijuana industry?
 - Most of their employees are promoted from within. All employees are given the opportunity to grow with the company, regardless of background. They prioritize their work ethic and abilities. When a new position becomes available, all employees are eligible to apply.
7. Proof that the marijuana business has received recognition and maintains the status as a Silver Level Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency.
- In January 2023, they became Gold Level Certified.

Please see the attached Marijuana Renewal Application Checklist that verifies that this business has met all the requirements for renewal. This checklist was completed by City staff to verify if all requirements of the ordinance have been met. The City Clerk has verified that the applicant has no outstanding financial obligations to the City, there have been no complaints to the City Manager regarding compliance with the City's anti-discrimination ordinance, and the facility has passed its City Fire & Zoning inspections. The applicant has met all the requirements for renewal.

RECOMMENDATION

Staff recommends that the EDC Board recommend to the City Clerk's Office a 2-year approval of the Adult-Use Retailer Permit to Refine Michigan Co.

ATTACHMENTS

Refine Michigan Co. Renewal Application, (Staffing Plan), (Community Benefits Statement), and (Social Equity Plan) from the applicant.

Adult Use Retailer Marihuana Renewal Application Checklist for:

Refine Michigan Co. DBA The Refinery

3650 Alvan Road

Contact: Andrea Nelson

anelson@honigman.com

Type: Adult Use Retailer

	Date Received	Received By	Comments	
Renewal Application Received	2/20/2023	Scott Borling		
Inspection Type:	Inspection Date	Completed by:	Satisfactory?	Notes
Zoning Inspection	3/28/2023	Pete Eldridge	Yes	
Fire Inspection	3/28/2023	Scott Brooks	Yes	
	Date	Name	Comments	
Business Community Benefits Check-In	3/29/2023	Jared Chambers		
	Invite Sent	EDC Meeting Date		
Invite to EDC Meeting		5/18/2023		
	Full-Time	Part-Time	Comments	
Jobs Created				
	Yes/No	Comments:	Verified by:	
Any Past Due Financial Obligations with City? (i.e. taxes owed, fees, fines, etc)	No		Andrew Falkenberg	
Silver Level Social Equity All-Star or better status with the Michigan Cannabis Regulatory Agency	Gold			
Attachments	Staffing Plan	City Economic Benefits Plan	Social Equity Plan	Handbook
	Yes	Yes	Yes	N/A

All Items Complete Yes

MARIHUANA BUSINESS PERMIT RENEWAL APPLICATION

Pursuant to Chapter 20B of the Kalamazoo City Code

**City of Kalamazoo
Office of the City Clerk
241 West South Street
Kalamazoo, MI 49007**

(Please Print)

BUSINESS INFORMATION (The entity that is licensed by the state and that holds a City MMF permit)

Official Business Name Refine Michigan Co.

Business Address 3650 Alvan Road

City Kalamazoo **State** MI **Zip Code** 49001 **Business Phone** 269-760-0841

Business E-mail erin@refinemi.com

Business Website _____

TYPE OF PERMIT BEING RENEWED

Medical

Grower:

☐ Class A (500 plants)

☐ Class B (1,000 plants)

☐ Class C (1,500 plants) No. of Class C Permits _____

☐ Processor

☐ Safety Compliance

☐ Provisioning Center

☐ Secure Transporter

Adult Use

Grower:

☐ Class A (100 plants)

☐ Class B (500 plants)

☐ Class C (2,000 plants) No. of Class C Permits _____

☐ Excess Grower

☐ Processor

☐ Safety Compliance

☐ Microbusiness

☒ Retailer

☐ Secure Transporter

☐ Designated Consumption Lounge

FACILITY INFORMATION

Property Address 3650 Alvan Road Kalamazoo, MI 49001

Real Property Parcel Number 06-91-061-640

Advertised Facility Name The Refinery

Manager - Full Name Erin Farrell

CONTACT INFORMATION [the primary point(s) of contact for this application]

Name Erin Farrell

Address 3650 Alvan Road

City Kalamazoo

State MI

Zip Code 49001

Phone 269-760-7654

E-mail erin@refinemi.com

Name Thomas Farrell

Address 3650 Alvan Road

City Kalamazoo

State MI

Zip Code 49001

Phone 269-760-0841

E-mail tpf@refinemi.com

ATTACHMENTS

Please attach the following as separate documents to this application:

1. The attached Staffing Plan worksheet and any additional pages that provide a description of the actual number of employees, including the number and type of jobs that the licensed facility has created, and the amount and type of compensation (including benefits) paid for such jobs; and
2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the facility; the results of community outreach efforts; and worker training programs.
3. A social equity plan that: (a) promotes and encourages participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement; and (b) positively impacts local residents.
4. Documentation that indicates your business qualifies as a Silver Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency. **A marihuana business must meet this qualification to be eligible for permit renewal with the City of Kalamazoo.**

The City's Economic Development Corporation will use the information provided in these documents to evaluate the permit holder's compliance with the statements it provided with its initial application (specifically the representations made in Attachment G – Staffing Plan and Attachment H – Community Benefits Statement).

Please complete the following certifications:

- ☒ The permitted facility is not in default to the City for any property tax, special assessment, utility charges, fines, fees or other financial obligation owed to the City.
- ☒ The hiring and public accommodation practices of the permitted facility conforms to the City's anti-discrimination ordinance provisions.
- ☒ I consent to an inspection of the permitted premises as required by ordinance to ensure the premises and its systems are in compliance with the requirements of Chapter 20B of the Kalamazoo City Code.
- ☒ I understand that renewal of a City Operating Permit is contingent on renewal of the State Operating License for this facility.

I hereby certify under the penalty of perjury that the statements made in this application, including all attachments thereto, are true. I further certify that I am an officer, director, or managerial employee of the applicant or a person who holds a direct or indirect ownership interest in the applicant.

Applicant Signature: _____

Date: 2/8/23

Name (printed): Erin Farrell

Position: Treasurer

STAFFING PLAN

Summary

Please indicate the number of employees who work at the licensed facility:

Full-time employees (32+ hours per week) 18 Part-time employees (< 32 hours per week) 3

Position Types and Compensation

Please provide a description of the types of jobs the licensed facility has created, along with the amount of compensation and benefits paid for such jobs:

Position Title: General Manager Annual Average Compensation \$ 70,000

How many people are employed in this position at the licensed facility? 1

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All x Partial None

Position Title: Manager Annual Average Compensation \$ 20-25 per hour

How many people are employed in this position at the licensed facility? 8

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Receptionist Annual Average Compensation \$ 14 per hour

How many people are employed in this position at the licensed facility? 3

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Budtender Annual Average Compensation \$ 15 per hour

How many people are employed in this position at the licensed facility? 8

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All Partial None x

Position Title: Treasurer Annual Average Compensation \$ 65,000

How many people are employed in this position at the licensed facility? 1

Are health insurance benefits available for employees in this position? Yes x No

If yes, please indicate the employer contribution to health insurance costs: All x Partial None

Please provide information on any benefits other than health insurance that are offered to all employees:
After 2 years, employees are offered PTO. As they continue to work for The Refinery, they will
increase PTO over time.

Attach additional pages as necessary.

STAFFING PLAN

Compliance with Social Equity Policy

1. How many of your current employees reside in the following Census Tracts:

Census Tract 1 (Eastside Neighborhood)	<u>3</u>
Census Tracts 9 and/or 10 (Edison Neighborhood)	<u>2</u>
Census Tracts 2.02, and/or 3 (Northside Neighborhood)	<u>0</u>

2. What is your plan to employ residents of the identified Census Tracts?

Introductory positions are posted via various employment seeking sites. The application states that all people are encouraged to apply, emphasizing people of color and those disproportionately impacted. In addition, The Refinery has ties to community organizations in these neighborhoods, and has sought employees from these organizations. We will continue to do so as the demand and availability are there.

Attach additional pages as necessary.

3. How many of your employees have prior marihuana convictions or expungements (excepting a conviction for delivery or distribution to a minor)?

Number of employees with marihuana convictions 3

4. What is your plan for employees with a prior marihuana conviction to move up within your business and/or the marihuana industry?

The majority of our employees are promoted from within. All employees are given the opportunity to grow with the company, regardless of background. We prioritize their work ethic and abilities.
When a new position becomes available, all employees are eligible to apply.

Attach additional pages as necessary.

Refine Michigan Co. (d/b/a The Refinery) has been operating for nearly 4 years. Over the last three years we have grown substantially in the community, however, a lot of new businesses are creating a lot of competition, so we are moving cautiously. When we originally opened, we faced many changes in the first few months, at that time we did not have the resources to offer our employees' health insurance as we initially hoped to do. Currently, we offer our full-time employees health insurance options, as well as opportunity for Paid Time Off. Employees eligible for this Paid Time Off must have worked for us for two years. We have officially hit that mark and have many employees eligible and coming eligible in the next few months. As indicated in our Staffing Plan Summary, we currently employ 21 people, and we deliberately sought to hire applicants who are not only Kalamazoo residents, but also represent a diverse cross section of the community. We currently employ 13 females, including 3 persons of color, 2 of whom are in management positions. We also employ 8 males, including 4 persons of color, 3 of whom are in management positions. Eighteen of our employees are currently working full time. The other qualified candidates we hired are working at the Refinery as a second job, or they are only available for up to 25 hours per week due to other commitments (e.g., family, school, etc.).

As noted in the attached staffing plan, we have 3 employees residing in the Eastside neighborhood, and 2 in the Edison neighborhood. Our current plan to employ these residents is based on our job postings. We have postings on various employment seeking sites. The application states that all people are encouraged to apply, with emphasis on people of color and those disproportionality impacted by cannabis regulations. In addition, Refine Michigan Co, has ties to community organizations in these neighborhoods, and have previously sought employees from these organizations. We will continue to do so as the demand and opportunity are available.

Economic Benefits to City of Kalamazoo by Refine Michigan Co.

- The Refinery has been successful in adding 21 employees to its staff over the last year. We have 13 women employees, including 7 in supervisor positions, and 2 women of color. We have 8 male employees, including 4 men of color, and 3 of which are in supervisor positions. 80% of our current employees are residents of Kalamazoo City, and 100% from within Kalamazoo County.
- Our current hiring practices aim to hire local employees using websites like Indeed. We have also reached out to several City Council members to help in our search for people of color and those that have been disproportionality affected by marihuana prohibition and enforcement.
- The Refinery buys from and supports fellow Kalamazoo businesses whenever possible for sourcing everything from products and services. We also try and support other Michigan (locally owned) businesses when buying outside Kalamazoo proper. Here are just a few examples:
 - We hired a Portage area contractor and Kalamazoo subcontractors to construct our store.
 - We use Allegra in Portage for our printing needs.
 - We use a Portage area CPA for our book keeping.
 - We often make purchases at shops in town, such as Office Depot or Lowes rather than purchasing from Amazon
 - We regularly buy our employees breakfast, lunch, or snacks from local restaurants, including Godfather's Pizza, Water Street, and Sweet Water.
- The Refinery remains committed to supporting local charitable causes, and the owners have donated \$23,400 annually to the Douglass Community Association, Black Wall Street Kalamazoo, Urban Alliance, Synergy Health Center, and Redemption's Last Prisoner Project. We have also donated to the local Fraternal Order of Police. In addition to donations, we have hosted events with KAR (Kalamazoo Animal Rescue) to encourage adoption of local dogs and cats.
- The Refinery deliberately spends a little more for environmentally friendly items (e.g., our carry-out bags are all natural, recyclable, and compostable so as not to contribute to the plastic refuse problems).
- During the 2022 Holiday season, The Refinery was able to help donate nearly 2 tons of food to our local Loaves & Fishes with the help of our customers and employees.
- Two members of The Refinery team were able to participate in an ERACCE workshop, which is a local organization helping to eliminate racism in our community. They plan to continue with another workshop in the coming year.

Social Equity Plan

The Refinery is a local, family-owned business, committed to serving and improving Kalamazoo and the surrounding communities. The Refinery is also committed to sustainable, environmentally friendly development, and encouraging environmental conservation.

The Refinery strives to hire local labor, and pay fair wages well above the State minimum wages. We are proud to provide healthcare, PTO, and other benefits to its workers in 2023. Where possible, The Refinery works with properly licensed local suppliers and contractors for construction, business services, and the acquisition of products. The Refinery is proud to support other local businesses and its community.

The Refinery is committed to hiring and maintaining a diverse, multi-ethnic, and multi-cultural workforce that is reflective of the communities in which it operates and the nation at large. Not only do we prioritize diversity across race, gender, and ethnicity in our hiring, but we also prioritize hiring within communities that have been disproportionately impacted by cannabis criminalization, including those who carry permissible convictions within the LARA/CRA and State of Michigan hiring requirements.

We foster an inclusive culture that is organized around employee engagement, individual responsibility, and individual empowerment to express diverse opinions and perspectives, all aligned with the Company's core vision to empower the health and wellness of those around us.

The Refinery is owned and operated by a Kalamazoo father-son team, who are committed to growing the entire Kalamazoo cannabis community, and would like to share the knowledge they've gained while being Registered Caregivers with the small growers that may be interested in joining the industry but don't yet have the capital necessary to establish a fully licensed and permitted growing facility.

When hiring for the Provisioning Center, The Refinery targeted City of Kalamazoo residents when seeking applications. Because the City of Kalamazoo is a disproportionately impacted community, we strive to hire community workers, most specifically, we are intentional in hiring individuals that are persons of color, and those that have been disproportionately affected by marijuana prohibition and enforcement. These individuals are highly encouraged to apply to all open positions. Currently The Refinery 'Ban's the Box' when it comes to new employee applications. Since the retail location has opened, The Refinery has kept a diverse team across all levels of the company.

We currently have thirteen women employees, including 7 in supervisor positions, two of whom are women of color. We have eight male employees, including 4 men of color, and 3 of which are in supervisor positions. 80% of our current employees are residents of Kalamazoo City, and 100% from within Kalamazoo County.

In addition, we have 3 employees with previous marijuana convictions, one of whom is a manager. As previously stated, all individuals are encouraged to apply to open positions. The Refinery often hires leadership positions from within the company, allowing these individuals more opportunity for growth and success within the company.

We look forward to continued service to our Kalamazoo community as our operations grow.



The Refinery Kalamazoo

AU-R-000250

This entity qualifies for the Gold level tier of the Social Equity All-Star Program

Social Equity Plan

The Refinery is a local, family-owned business, committed to serving and improving Kalamazoo and the surrounding communities. The Refinery is also committed to sustainable, environmentally friendly development, and encouraging environmental conservation.

The Refinery strives to hire local labor, and pay fair wages well above the State minimum wages. We are proud to provide healthcare, PTO, and other benefits to its workers in 2023. Where possible, The Refinery works with properly licensed local suppliers and contractors for construction, business services, and the acquisition of products. The Refinery is proud to support other local businesses and its community.

The Refinery is committed to hiring and maintaining a diverse, multi-ethnic, and multi-cultural workforce that is reflective of the communities in which it operates and the nation at large. Not only do we prioritize diversity across race, gender, and ethnicity in our hiring, but we also prioritize hiring within communities that have been disproportionately impacted by cannabis criminalization, including those who carry permissible convictions within the LARA/CRA and State of Michigan hiring requirements.

We foster an inclusive culture that is organized around employee engagement, individual responsibility, and individual empowerment to express diverse opinions and perspectives, all aligned with the Company's core vision to empower the health and wellness of those around us.

The Refinery is owned and operated by a Kalamazoo father-son team, who are committed to growing the entire Kalamazoo cannabis community, and would like to share the knowledge they've gained while being Registered Caregivers with the small growers that may be interested in joining the industry but don't yet have the capital necessary to establish a fully licensed and permitted growing facility.

Corporate Spend Plan

We plan to have up to 10% of our operational expenses to be with diverse suppliers, including Women-owned, Minority-owned, as well as including suppliers who were previously disproportionately impacted by marijuana enforcement.

Examples of companies include the following:

- Sozo Companies
- Hytek Cultivation
- MG Royalty
- Healing Organic Gardens
- 3300 Miller Rd LLC

Whenever possible, we aim to use Kalamazoo businesses to purchase services and supplies. We understand that if we can invest in our own community, our community will be able to grow and flourish. Kalamazoo is one of many areas disproportionately impacted and recognized by the CRA's social equity program. The Refinery will continue to invest time in business partnerships within these communities.

The Refinery partners with business ventures with licensees who qualified for the CRA's social equity program or who the licensee has identified as disproportionately impacted based on criteria established by the licensee.

Additionally, in Kalamazoo, owners of The Refinery plan on applying for a new grower license in accordance with existing regulations of the city in the near future, further contributing to the economic landscape of the City of Kalamazoo.

Community Reinvestment Plan

The total community reinvestment will be up to 0.5% of forecasted revenue. Half of the reinvestment will go towards monthly community donations to local and minority-owned non-profits and businesses. The remaining will be put toward leadership diversity and race training through local Kalamazoo businesses. Some of these diversity trainings include ERRACE, as well as the annual Synergy Health symposium.

Furthermore, The Refinery plans to partner with various local organizations to help enhance our community. We have partnered with Loaves and Fishes of Kalamazoo for an annual food drive to provide minimally 4 tons of food to the community. In addition, we have also hosted Kalamazoo Animal Rescue to help with the rehoming of dogs and cats. Finally, change 'round up' events are hosted monthly. A community organization is chosen, and our customers can participate in helping us donate. At the end of the month, The Refinery matches this donation.

Additionally, The Refinery plans on redistributing the licensing savings, up to 25% gained from the CRA social equity program, back into city approved non-profits.

When hiring for the Provisioning Center, The Refinery targeted City of Kalamazoo residents when seeking applications. Because the City of Kalamazoo is a disproportionately impacted community, we strive to hire community workers, most specifically, we are intentional in hiring individuals that are persons of color, and those that have been disproportionately affected by marihuana prohibition and enforcement. These individuals are highly encouraged to apply to all open positions. Currently The Refinery 'Ban's the Box' when it comes to new employee applications. Since the retail location has opened, The Refinery has kept a diverse team across all levels of the company.

The Refinery also actively seeks to employ individuals from nearby CRA identified disproportionately impacted communities at their marijuana establishment. In addition to this, the company actively employs and seeks to employ disproportionately impacted individuals who have qualified for the CRA's social equity program, including but not limited to: caregivers or individuals with marijuana-related convictions, individuals the licensee has identified as having been disproportionately impacted based on criteria established by the licensee and individuals who are impacted in the future.

We currently have twelve women employees, including 5 in supervisor positions, two of whom are women of color. We have five male employees, including 4 men of color, and 2 of which are in supervisor positions. 75% of our current employees are residents of Kalamazoo City, and 90% from within Kalamazoo County.

In addition, we have 3 employees with previous marijuana convictions, one of whom is a manager. As previously stated, all individuals are encouraged to apply to open positions. The Refinery often hires leadership positions from within the company, allowing these individuals more opportunity for growth and success within the company.

We look forward to continued service to our Kalamazoo community as our operations grow.

INTER-OFFICE MEMO

To: The Economic Development Corporation Board of Directors

From: Paul Thuringer, Economic Development Supervisor
Jared Chambers, Business Specialist

Date: May 15, 2023

Re: Adult Use Retailer Permit Renewal for Redbud Roots Lab VI, Inc.

The City Clerk's Office has requested that the Economic Development Corporation (EDC) Board of Directors evaluate the *Marihuana Facility Permit Renewal Application* submitted by Redbud Roots Lab VI, Inc. for its facility at 218 E. Stockbridge Avenue and that the EDC Board provide a recommendation regarding the renewal of this permit.

BACKGROUND

On February 5, 2022, the City Clerk issued an Adult Use Retailer Permit to Redbud Roots Lab VI, Inc., the applicant, for its facility at 218 E. Stockbridge Avenue. This City Operating Permit is set to expire on May 5, 2023, and must be renewed prior to that date in order for the facility to continue operating. The applicant has submitted the required renewal application and the annual permit fee. City ordinance requires that the Economic Development Corporation review the renewal application and provide a recommendation. Below is the ordinance language that describes the specific role and responsibilities of the EDC in this process:

§ 20B-12

C. In determining whether to grant a renewal of a permit, the members of the City's Economic Development Corporation board will evaluate the permit holder's compliance with the statements it provided with its initial application and submission with its request for renewal of the following information:

1. The Staffing plan for the business which describes the actual number of employees, including the number and type of jobs that the facility has created, and the amount and type of compensation (including benefits) paid for such jobs;
 - Redbud Roots has employed 29 people, 15 full-time and 14 part-time.
 - 2 Store Managers, \$78,000 yearly salary
 - 4 Assistant Store managers, \$52,000 yearly salary
 - 1 Inventory Manager, \$37.50/hour
 - 22 Budtenders, \$17.00/hour
 - However, they've had to temporarily close due to theft, requiring them to re-assess their accounting and inventory. As a result, they were forced to let some employees go but were able to transfer 12 employees to their Muskegon and Battle Creek locations.
 - Full medical, dental, and vision insurance are offered to all employees. All employees, including part-time employees, are eligible for benefits after 90 days of employment.

2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the business, results of efforts for community outreach and worker training programs;
 - Redbud's initial staffing plan for the city of Kalamazoo had an estimate of a total of 10 full-time employees and 2 part-time employees with compensation ranging from \$14.00 per hour to an annual salary of \$65,000. At that time, Redbud's estimated annual spending on employees' salaries was approximately \$419,640.
 - By 2023 Redbud employed 15 full-time and 14 part-time employees with compensation ranging from \$17.00 per hour to an annual salary of \$78,000 with a total estimated annual spending on employees' salaries of \$972,400.
 - Redbud, in conjunction with Fresh Thyme CBD, is currently working with Western Michigan University for a Cannabis Marketing class during the Spring 2023 semester. This is a course that is designed to equip the student with the necessary tools and background to successfully enter the cannabis industry.
 - Redbud is teaming up with Wayne State University for the purpose of conducting research studies on the effects of cannabis on behavioral health among veterans. The overall goal of this research program is to provide evidence-based information to the scientific community and public on the impact of cannabis and cannabinoids on depression, post-traumatic stress disorder, suicidal thoughts and behaviors, and other behavioral and mental health outcomes in veteran populations. Redbud is supplying the cannabis products for the research study.
3. An explanation, with supporting factual data, of the efforts and success achieved by the social equity plan of the business to promote and encourage participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement, and the positive impact of the social equity plan on local residents;
 - Redbud has developed an action plan to inform, hire, and educate minorities, women, veterans, state residents, and disabled persons. As a result; 14 employees are female, 13 employees are persons of color, and 6 employees have prior marijuana convictions.
 - See 6C for additional documentation.
4. A statement that the business is not in default to the City for any property tax, special assessment, utility charges, fines, fees, or other financial obligation owed to the City;
 - At this time, they are in default to the City for back taxes.
5. A statement that the hiring and public accommodation practices of the facility conform to the City's Nondiscrimination Ordinance provisions and documentation of the total number of employees broken out by managerial and operational employees, number of women, and number of minority employees and number of employees disproportionately impacted by marihuana prohibition and enforcement.
 - They've confirmed that their hiring and public accommodations practices conform to the City's anti-discrimination ordinance provisions.

6. A statement, with supporting documentation, providing answers to the following questions:
 - a. How many City residents do you currently employ?
 - At the time of application, there were at least 16 City Residents. Currently, it is unknown how many are still employed due to the closure.
 - b. How many current employees reside in Census Tracts 1 (Eastside); 9, 10 (Edison), and/or 2.02,3 (Northside)?
 - At the time of application submission, they employed;
 - 4 people from the Eastside Neighborhood.
 - 7 people from the Edison Neighborhood.
 - 5 people from the Northside Neighborhood.
 - c. What is your plan to employ residents of the identified census tracts?
 - The use of hiring fairs in the identified census tracts and job postings, promoted heavily in the identified census tracts.
 - d. How many of your employees have prior marihuana convictions (excepting a conviction for delivery or distribution to a minor)?
 - 6 employees at the time of application submission.
 - e. What is your plan for employees with a prior marihuana conviction to move up within your business and/or the marihuana industry?
 - They plan to train, educate, and advise all their employees on best practices within the industry. All employees receive a fair chance for career acceleration.
7. Proof that the marihuana business has received recognition and maintains the status as a Silver Level Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency.
 - On May 12, 2023, they became Gold-level Certified.

Please see the attached Marihuana Renewal Application Checklist that verifies that this business has met all the requirements for renewal, pending zoning items, fire inspection items, and taxes needing to be paid. (Highlighted items on the checklist). This checklist was completed by City staff to verify if all requirements of the ordinance have been met. The City Clerk has verified that the applicant has no outstanding financial obligations to the City, there have been no complaints to the City Manager regarding compliance with the City's anti-discrimination ordinance, and the facility has not passed its City Fire & Zoning inspections. The applicant has not met all the requirements for renewal.

RECOMMENDATION

Staff recommends that the EDC Board recommend to the City Clerk's Office a 90-day probationary approval of the Adult Use Retailer Permit to Redbud Roots Lab VI, Inc., pending correction of the zoning and fire inspection issues, and payment of delinquent taxes.

ATTACHMENTS

Redbud Roots Lab VI, Inc. Renewal Application, (Staffing Plan), (Community Benefits Statement), and (Social Equity Plan) from the applicant.

Adult Use Retailer Marihuana Renewal Application Checklist for:

Redbud Roots Lab VI, Inc DBA GLH

218 E Stockbridge

Contact: Alexander Leonowicz

alex@redbudroots.com

Type: Adult Use Processor

	Date Received	Received By	Comments	
Renewal Application Received	2/22/2023	Scott Borling		
Inspection Type:	Inspection Date	Completed by:	Satisfactory?	Notes
Zoning Inspection	5/3/2023	Pete Eldridge	The handicap parking space sign was missing. No bike rack	
Fire Inspection	5/3/2023	Scott Brooks	Knox box keys, and some items around the electrical panel need to be moved.	
	Date	Name	Comments	
Business Community Benefits Check-In		Jared Chambers		
	Invite Sent	EDC Meeting Date		
Invite to EDC Meeting		5/18/2023		
	Full-Time	Part-Time	Comments	
Jobs Created				
	Yes/No	Comments:	Verified by:	
Any Past Due Financial Obligations with City? (i.e. taxes owed, fees, fines, etc)	Yes	Owes \$12,000 to the County, did not pay 2022 taxes	Andrew Falkenberg	
Silver Level Social Equity All-Star or better status with the Michigan Cannabis Regulatory Agency				
Attachments	Staffing Plan	City Economic Benefits Plan	Social Equity Plan	Handbook
				N/A

All Items Complete

No

MARIHUANA BUSINESS PERMIT RENEWAL APPLICATION

Pursuant to Chapter 20B of the Kalamazoo City Code

**City of Kalamazoo
Office of the City Clerk
241 West South Street
Kalamazoo, MI 49007**

(Please Print)

BUSINESS INFORMATION (The entity that is licensed by the state and that holds a City MMF permit)

Official Business Name Redbud Roots Lab VI, Inc.
Business Address 215 Post Road
City Buchanan **State** MI **Zip Code** 49107 **Business Phone** 269-999-1090
Business E-mail info@redbudroots.com **Business Website** www.redbudroots.com

TYPE OF PERMIT BEING RENEWED

Medical

Grower:

- ☐ Class A (500 plants)
☐ Class B (1,000 plants)
☐ Class C (1,500 plants) No. of Class C Permits _____

- ☐ Processor
☐ Safety Compliance

- ☐ Provisioning Center
☐ Secure Transporter

Adult Use

Grower:

- ☐ Class A (100 plants)
☐ Class B (500 plants)
☐ Class C (2,000 plants) No. of Class C Permits _____
☐ Excess Grower

- ☐ Processor
☐ Safety Compliance
☐ Microbusiness

- ☒ Retailer
☐ Secure Transporter
☐ Designated Consumption Lounge

FACILITY INFORMATION

Property Address 218 E. Stochbridge, Kalamazoo, MI 49001
Real Property Parcel Number 06-22-384-002
Advertised Facility Name Redbud Roots and GLH
Manager - Full Name Alexander Leonowicz

CONTACT INFORMATION [the primary point(s) of contact for this application]

Name Alexander Leonowicz

Address 215 Post Rd. **City** Buchanan **State** MI **Zip Code** 49107
Phone 269-999-1090 **E-mail** alex@redbudroots.com

Name Shawntel Wiskotoni

Address 455 Post Rd. **City** Buchanan **State** MI **Zip Code** 49107
Phone 269-999-1087 **E-mail** swiskotoni@redbudroots.com

ATTACHMENTS

Please attach the following as separate documents to this application:

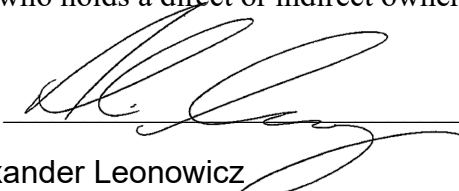
1. The attached Staffing Plan worksheet and any additional pages that provide a description of the actual number of employees, including the number and type of jobs that the licensed facility has created, and the amount and type of compensation (including benefits) paid for such jobs; and
2. An explanation, with supporting factual data, of the economic benefits to the City and the job creation for local residents achieved by the facility; the results of community outreach efforts; and worker training programs.
3. A social equity plan that: (a) promotes and encourages participation in the marihuana industry by local residents that have been disproportionately impacted by marihuana prohibition and enforcement; and (b) positively impacts local residents.
4. Documentation that indicates your business qualifies as a Silver Social Equity All-Star or better with the Michigan Cannabis Regulatory Agency. **A marihuana business must meet this qualification to be eligible for permit renewal with the City of Kalamazoo.**

The City's Economic Development Corporation will use the information provided in these documents to evaluate the permit holder's compliance with the statements it provided with its initial application (specifically the representations made in Attachment G – Staffing Plan and Attachment H – Community Benefits Statement).

Please complete the following certifications:

- ☒ The permitted facility is not in default to the City for any property tax, special assessment, utility charges, fines, fees or other financial obligation owed to the City.
- ☒ The hiring and public accommodation practices of the permitted facility conforms to the City's anti-discrimination ordinance provisions.
- ☒ I consent to an inspection of the permitted premises as required by ordinance to ensure the premises and its systems are in compliance with the requirements of Chapter 20B of the Kalamazoo City Code.
- ☒ I understand that renewal of a City Operating Permit is contingent on renewal of the State Operating License for this facility.

I hereby certify under the penalty of perjury that the statements made in this application, including all attachments thereto, are true. I further certify that I am an officer, director, or managerial employee of the applicant or a person who holds a direct or indirect ownership interest in the applicant.

Applicant Signature:  Date: 02/13/2023

Name (printed): Alexander Leonowicz Position: Vice-President

STAFFING PLAN

Summary

Please indicate the number of employees who work at the licensed facility:

Full-time employees (32+ hours per week) 15 Part-time employees (< 32 hours per week) 14

Position Types and Compensation

Please provide a description of the types of jobs the licensed facility has created, along with the amount of compensation and benefits paid for such jobs:

Position Title: Store Manager Annual Average Compensation \$ 78,000

How many people are employed in this position at the licensed facility? 2

Are health insurance benefits available for employees in this position? Yes ☒ No ☐

If yes, please indicate the employer contribution to health insurance costs: All ☐ Partial ☒ None ☐

Position Title: Assistant Store Manager Annual Average Compensation \$ 52,000

How many people are employed in this position at the licensed facility? 4

Are health insurance benefits available for employees in this position? Yes ☒ No ☐

If yes, please indicate the employer contribution to health insurance costs: All ☐ Partial ☒ None ☐

Position Title: Inventory Manager Annual Average Compensation \$ 37.50/hour

How many people are employed in this position at the licensed facility? 1

Are health insurance benefits available for employees in this position? Yes ☒ No ☐

If yes, please indicate the employer contribution to health insurance costs: All ☐ Partial ☒ None ☐

Position Title: Budtender Annual Average Compensation \$ 17.00/hour

How many people are employed in this position at the licensed facility? 22

Are health insurance benefits available for employees in this position? Yes ☒ No ☐

If yes, please indicate the employer contribution to health insurance costs: All ☐ Partial ☒ None ☐

Position Title: N/A Annual Average Compensation \$

How many people are employed in this position at the licensed facility?

Are health insurance benefits available for employees in this position? Yes ☐ No ☐

If yes, please indicate the employer contribution to health insurance costs: All ☐ Partial ☐ None ☐

Please provide information on any benefits other than health insurance that are offered to all employees:

Full medical, dental, and vision insurance are offered to all employees. All employees, including part-time employees, are eligible for
benefits after 90 days of employment.

Attach additional pages as necessary.

STAFFING PLAN

Compliance with Social Equity Policy

1. How many of your current employees reside in the following Census Tracts:

Census Tract 1 (Eastside Neighborhood) 4

Census Tracts 9 and/or 10 (Edison Neighborhood) 7

Census Tracts 2.02, and/or 3 (Northside Neighborhood) 5

2. What is your plan to employ residents of the identified Census Tracts?

The use of hiring fairs at locations in the above mention Census Tracts and/or job postings promoted heavily in the above mentioned Census Tracts.

Attach additional pages as necessary.

3. How many of your employees have prior marihuana convictions or expungements (excepting a conviction for delivery or distribution to a minor)?

Number of employees with marihuana convictions 6

4. What is your plan for employees with a prior marihuana conviction to move up within your business and/or the marihuana industry?

We plan to train, educate, and advise all of our employees on best practices within the industry. All employees receive a fair chance for carrer acceleration.

Attach additional pages as necessary.

Staffing Plan

Duties & Responsibilities of Directors & Executive Officers

The Directors

The Board of Directors (“Board”) oversee the management of Redbud Roots Lab VI, Inc. (hereinafter, the “Company” or “Redbud”)’s business; they make the strategic and operational decisions of the Company and are responsible for ensuring that the Company meets its statutory obligations. Each Director is to participate in Board meetings to enable the Board to reach these decisions and make sure that the Company’s obligations are fulfilled. The Board may also delegate certain powers to executive officers.

The President

Has general supervision over the business of the Company and other duties incidental to the office of President, and any other duties as may be from time to time assigned to the President.

The Vice-President

Has such powers and perform such duties as may be assigned to him or her from time to time by the Board or the President.

The Secretary

Attends meetings of the Board; record all votes and the minutes of all proceedings in a book to be kept for that purpose; and shall perform like duties for committees when required. He or she will give, or cause to be given, notice of all meetings of the shareholders or Board, and shall perform such other duties as may be prescribed by the President. The Secretary shall keep in safe custody the seal of the company and have authority to affix the seal to all documents requiring it and attest to the same.

The Treasurer

Has custody of the corporate funds and securities, except as otherwise provided by the President. He or she shall keep full and accurate accounts of receipts and disbursements in books belonging to the Company; and shall deposit all monies and other valuable effects in the name and to the credit of the Company in such depositories as may be designated by the President. As Treasurer, he or she shall disburse the funds of the Company as may be ordered by the President, taking proper vouchers for such disbursements, and shall render to the President and the Board, at the regular meetings of the Board, or whenever they may require it, an account of all his or her transactions as Treasurer and of the financial condition of the company.

Hiring Process, Procedures & Training

Employee Structure

The Company will employ a diverse workforce and act as an equal opportunity employer. Redbud strives to be an inclusive company made up of talented and diverse individuals from many ethnicities and cultures. The Company will prioritize local residents in hiring for positions. Redbud will develop an action plan to inform, hire, and educate minorities, women, veterans, state residents, and disabled persons. The Company’s executive team

is committed to building a company with fair treatment, access, opportunity, and advancement for people of all demographic backgrounds, and believes deeply that it is the company’s responsibility to take care of the people that take care of them. Redbud will continue to build this inclusive work environment throughout its operation. As you will see in the chart below, the Company intends on continuing operations of its Kalamazoo provisioning center, should it be privileged enough to be granted renewal, with at least 29 employees, 50% of them being full-time.

NUMBER OF EMPLOYEES	POSITION	FULL-TIME OR PART-TIME	SALARY OR HOURLY RATE
2	Store Manager	Full-Time	\$78,000/year + benefits
4	Assistant Store Manager	Full-Time	\$52,000/year + benefits
1	Inventory Manager	Full-Time	\$37.50/hr. + benefits
22	Budtender	Full-Time & Part-Time	\$17.00/hr. + benefits

Determine Need for Personnel

Upon the need for additional personnel, the Store Managers (“Managers”) will place a request to the Vice-President of Redbud, indicating the following:

- Position title;
- Position's hours
- Exempt or nonexempt status of the position.
- Reason for the opening
- Essential job functions and qualifications (or a current job description may be attached).
- Any special instructions for recruiting for or advertising the position; and
- Job postings.

All regular exempt and nonexempt job openings will be posted on the Company’s bulletin boards for employees to review. Jobs will remain posted until the position is filled. Job postings are updated every two (2) weeks.

Internal transfers

Employees who have been in their current position for at least ninety (90) days may apply for internal job openings. This requirement may be waived by the Manager. All applicants for a posted vacancy will be considered based on their qualifications and ability to perform the job successfully. Internal candidates who are not selected will be notified by the President or Manager.

Recruitment advertising

Positions that cannot be filled internally will be advertised externally based on need and budget requirements. The Managers are responsible for placing all recruitment advertising.

Interview process

The Managers will screen applications and resumés prior to scheduling interviews. Initial interviews are generally conducted by the Managers.

Team interviews may be conducted as needed for some positions. If a team interview is conducted, a structured interview process is recommended. Interview questions should be compiled by the interviewing team and reviewed by the Managers prior to the interview. After the team completes the interview process, the results of the interview should be forwarded to the hiring manager/supervisor and the President for their review. The President has the sole authority to make the hiring decision.

The Managers will notify applicants who are not selected for positions. Reference checks, criminal background checks and any other requirements as outlined in the Medical Marihuana Facilities Licensing Act (“MMFLA”) and the Michigan Regulation and Taxation of Marihuana Act (“MRTMA”) must be performed.

After a decision has been made to hire a particular candidate, an offer will be made to that individual contingent on satisfactory completion of reference checks and criminal background checks. The Managers will check references for all candidates and contact final candidates to complete a pre-employment background check.

Job Offers

If the Manager receives satisfactory results from the reference checks and criminal background check, he or she will notify the candidate to confirm the job offer

Initial Start Date and Orientation

On an employee’s start date, he or she will complete the required paperwork and an orientation with the Managers. The Managers responsible for providing a department orientation for the new employee. The Managers will complete the New-Hire Checklist with new employees and review department policies and procedures with them.

Equal Employment Opportunity Plan

It is the policy of Redbud not to discriminate against any employee or any applicant for employment because of age, race, religion, color, handicap, sex (including sexual orientation or gender identity), physical condition, developmental disability or national origin. This policy shall include, but not be limited to, the following: recruitment and employment, promotion, demotion, transfer, compensation, selection for training including apprenticeship, layoff and termination.

The Vice-President has been appointed Equal Employment Opportunity Officer and is responsible for planning and implementing the Company’s affirmative action plan, as well as for its day-to-day monitoring of affirmative action-related decisions and activities. All personnel who are responsible for hiring and promoting employees and for the development and implementation of programs or activities are charged to support this. They shall provide leadership in implementing affirmative action goals and initiatives.

The Company shall abide by all state regulations and federal laws relating to equal employment opportunities and affirmative action. The Company shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities for all individuals.

More specifically, Redbud will ensure that at least 25% of its employees in Kalamazoo are of minority. Furthermore, 25% of the employees in the Kalamazoo facility must also be female. The Company will use the following chart in order to track its hiring procedures to determine whether it is complying with the EEO Plan:

The Company will continuously review its employment processes and procedures to ensure the job qualifications of applicants conform to this Equal Employment Opportunity Plan.

OCCUPATION OR JOB TITLE	TOTAL # OF EMPLOYEES		% OF FEMALE	TOTAL WHITE EMPLOYEES		TOTAL BLACK EMPLOYEES		TOTAL HISPANIC EMPLOYEES		OTHER RACE EMPLOYEES		SUBTOTAL MINORITY MALES	% OF MINORITY MALES
	M	F		M	F	M	F	M	F	M	F		

Hiring Employees

Prior to hiring a prospective employee, Redbud shall conduct a criminal history background check pursuant to Michigan's Administrative Rules section R 420.602, Rule 2.

The results of this background check shall be kept as records along with a confirmation of the criminal history. These records shall be available for inspection upon request by any authorized party.

All potential staff will be screened against a list of excluded employees based on a report or investigation maintained by the department in the statewide monitoring system.

All employees are hired on a probationary basis, for a period of 90 days. During this time, the employee is being monitored for strengths and weaknesses, so that said Employee may be placed in the best possible position based on their skillset, or let go due to lack of drive.

After the application and interview process, and the employee is hired, we need the following documents on file:

- Copy of their Driver's License or state-issued ID;
- Passport or Social Security Card;
- IRS Form W-4;
- I-9; and
- Copy of State background check and any other appropriate documents.

After the documents are obtained, they will be scanned, uploaded and saved where the Company electronically stores its human resources documents. The physical copies are to be kept in a folder labeled Employee in a "Last Name, First Name" format

After the above process is completed, a username is then to be assigned for any and all necessary inventory tracking programs and software programs used by the facility.

Each staff member's username and login will be assigned particular permissions in each of these programs, based upon their role and job description.

During the hiring process, the Company will adhere to the anti-discrimination ordinance currently enacted by the City of Kalamazoo that prevents the Company from denying an individual the enjoyment of his or her civil rights or be discriminated against because of their actual or perceived race, color, religion, national origin, sex (including sexual orientation or gender identity), age, height, weight, marital status, physical or mental disability, or family status.

Staffing Policies

Staff members are responsible for:

- a. ensuring that they are in compliance with all requirements of state, county and local law concerning their employment;
- b. reporting to their managers any incidents that may impact their ability to maintain employment in accordance with state, county and local laws;
- c. any and all actions taken during the course of their employment either within or outside of work that do not comply with all posted standards; and
- d. reporting any new or pending charges or convictions.

Redbud shall report all controlled substance-related felonies immediately to the Cannabis Regulatory Agency (“CRA”).

The Company will input all staff members into the statewide monitoring system and assign all staff an identification number. All information will be updated immediately with the monitoring system on a continuous basis.

Any and all access/permissions to the marihuana facility and statewide monitoring system will be revoked immediately following termination, or upon a determination by the Company, the CRA, or any other governing body that the employee is no longer eligible for employment at the facility.

All staff members will be trained and receive an employee training manual which shall contain, but is not limited to, employee safety procedures, employee guidelines, security protocol, and educational training, including, but not limited to, marihuana product information, dosage and daily limits, or educational materials.

Periodic Performance Reviews

Performance reviews will be conducted no less than once per fiscal quarter and no later than the 100th day of employment for any new staff member that successfully completes their initial 90-day probationary period.

General

Redbud recognizes that some offenses may be simply due to an employee being new and are opportunities for training and learning experiences, therefore, discipline is supposed to be constructive. In the beginning the goal is to assist the employee in improving performance and/or correct inappropriate actions, as opposed to being punitive.

To this end, if an employee is asked to do a simple task, and does it incorrectly, it is they who shall be the ones to correct the mistake so as to maximize the impact on their learning curve.

Redbud operates on a “Three strikes, you’re out” basis as guiding principle.

Dress Code

The Managers will determine the appropriate dress code and advise all employees accordingly.

Hours of Operation

Unless otherwise determined by the Managers, the hours of operation for Redbud will be as follows:

Monday:	7 am – 10 pm
Tuesday:	7 am – 10 pm
Wednesday:	7 am – 10 pm
Thursday:	7 am – 10 pm
Friday:	7 am – 10 pm
Saturday:	7 am – 10 pm
Sunday:	7 am – 10 pm

Disciplining Employees

In the event of a transgression of any sort by an employee, Managers are to:

- a. Maintain a professional manner by keeping the disciplinary process confidential;
- b. Make a careful diagnosis of the problem to determine whether disciplinary action is appropriate;
- c. Provide specific examples of performance discrepancies or work rule violations so the employee fully understands what needs correction;
- d. Allow the employee ample opportunity to explain so that the management team or Owner(s) have all the facts;
- e. Make sure discipline is the appropriate tool. For instance, would coaching or performance appraisal be sufficient to get the employee's attention?
- f. When taking disciplinary action, make sure the punishment fits the crime;
- g. Help the employee improve performance by providing specific recommendations and requirements; and
- h. Communicate clearly so the employee understands the consequences if performance or conduct does not improve.

Discipline Procedures

Informal Verbal Warning

- a. Schedule time for a meeting and ensure privacy.
- b. Make notes about what you want to say in advance.
- c. State clearly that you are issuing an oral warning.
- d. Be specific in describing the unacceptable performance or behavior.

- e. Remind the employee of the acceptable standards or rules and provide them in writing if available.
- f. State the consequences of failure to demonstrate immediate and sustained improvement: Further disciplinary action may be the result.
- g. Document the oral warning and key elements of discussion and keep on record; however, oral warnings do not need to go into the employee's personnel file.

Formal Verbal Warning

If employee's behavior does not improve after being issued an informal verbal warning, follow the steps above, and place a copy of the documented verbal warning in the employee's personnel file.

Written Warning

If the problematic behavior continues after a formal verbal warning, it may be more effective to give a written warning.

- a. Clearly state in the beginning of the letter that it is a written warning and cite the appropriate personnel policy or contract provision.
- b. Describe the performance problem(s) or work rule violation(s) in specific detail and attach supporting documentation if applicable.
- c. Outline previous steps taken to acquaint the employee with the issue and attach copies of the supporting documents if applicable.
- d. Describe the impact of the problem (safety issues, need to reassign work).
- e. Note the employee's explanation (as revealed during your investigation) or that the employee declined to offer one. If it was unacceptable, explain why.
- f. Reiterate your expectations regarding behavior and/or performance.
- g. Note that if the employee doesn't demonstrate immediate and sustained improvement, the consequence will be further disciplinary action, up to and including dismissal.
- h. Refer the employee to the appropriate policy or contract provision for appeal rights.
- i. Deliver the warning letter to the employee, have the employee sign to acknowledge receipt, and then place it in the employee's personnel file.

Suspension Without Pay

This is normally the next stage in progressive discipline after written warning(s). Suspension typically prevents work for a number of working days, as specified in the letter, and pay is docked accordingly. Length of a suspension without pay will be influenced by policy or contract requirements.

The letter states that it is a suspension without pay, the appropriate policy or contract provision, and the number of days the employee will be suspended. It also describes the problem, previous corrective measures, impact of the problem, future expectations, consequences of failure to improve, and the employee's appeal rights.

Separation

This alternative is normally selected after performance counseling and progressive discipline have failed to get the employee's attention to the problem. Separation is usually preceded by coaching, performance appraisal, and progressive disciplinary action. Dismissal without prior warning may be warranted depending on the severity of the misconduct. If Separation is appropriate, don't engage in unnecessary delays, which may hurt the morale and productivity of other employees.

In the case of dismissal use the Employee Separation Report to document the following:

- a. The identity and position of the Employee being terminated;
- b. The effective date of the intended action;
- c. The type of Separation;
- d. The reason(s) for Separation;
- e. The Separated Employee's Final Pay; and
- f. Include in the Employee file the previous steps taken to correct the problem, such as previous disciplinary actions, and attach copies of these documents.
- g. Deliver it to the employee and to the employee's personnel file with employee's signature acknowledging receipt.

Storage and Security of Employee Records

The Managers will retain and destroy personnel records in accordance with federal and state laws governing record retention. Below is an outline of the operating procedures for retention of personnel records, and their destruction when such retention periods have passed. If the Company's retention procedure is not of sufficient duration for any state in which the Company does business, state requirements shall supersede this procedure.

The Managers maintain both employee record information and government compliance reports. Both are subject to the following retention requirements and destruction procedures:

Maintenance of Employee Records

The following employee information records are maintained in segregated personnel files:

- a. Pre-employment testing results and background check information;
- b. USCIS Forms I-9;
- c. Benefits plan and employee medical records;
- d. Health and safety records; and
- e. General employee personnel records.

Government compliance reports are maintained in reverse chronological sequence and filed separately from the above employee information records.

Destruction of Employee and Applicant Records

All paper personnel records and confidential employee data maintained by the Company will be destroyed by shredding after retention dates have passed; this procedure pertains to all personnel records.

Employment application materials submitted by applicants who were never employed are also to be shredded.

Litigation Hold

When the Company is involved in, or anticipates that it may be involved in litigation, the Company will issue a litigation hold. This means that all documents relating to the matter in question must be kept, in order to preserve any potential evidence. If it fails to do so, the Company can be sanctioned by a court or arbitrating/mediating entity for destroying evidence. A court has broad authority to impose these sanctions, which may include anything from unfavorable procedural rulings during a trial, to payment of monetary damages.

In the event that the Company announces a litigation hold on any or all company records as a result of pending or anticipated litigation, all records covered by such litigation hold MUST NOT be discarded, deleted or destroyed. Further, the Company will suspend the automatic deletion of emails for all individuals covered by the litigation hold. Any questions about the litigation should be directed to the President.

Retention of Terminated Employees' Records

Record Types and Retention Periods

RECORD TYPE	RETENTION TIME
Health & Benefits Records	Termination + 3 yrs.
Health & Benefits Beneficiary Forms	Termination + 3 yrs.
Medical, Dental/Vision Plan Elections	Termination + 3 yrs.
Drug Test Results	Termination + 3 yrs.
Education Assistance Program Records	Termination + 3 yrs.
FMLA Leave Reports	Termination + 3 yrs.
COBRA Election Notice	Termination + 3 yrs.
Job Related Injuries & Illnesses Records	Termination + 5 yrs.
Reasonable Accommodation Records	Termination + 3 yrs.
Pre-Employment/Employment Documents*	Termination + 3 yrs.
Background Check Information	Termination + 3 yrs.
Form I-9	Termination + 3 yrs.
Employee Policy Acknowledgements	Termination + 3 yrs.
Disciplinary Records	Termination + 3 yrs.
Employee Development Records	Termination + 3 yrs.
Position/Pay History Records	Termination + 3 yrs.
Employee Performance Reviews	Termination + 3 yrs.
Resignation Letter	Termination + 3 yrs.
Termination Action Form	Termination + 3 yrs.
Separation Agreement	Termination + 5 yrs.
Exit Interview Form	Termination + 3 yrs.
Unemployment Claim Records	Termination + 4 yrs.
Time Sheets/Cards	4 yrs.

Direct Deposit Records	Termination + 4 yrs.
Garnishment Records	Termination + 4 yrs.
Final Payroll Deduction Checklist	Termination + 4 yrs.
HR Policies & Reports; EEO-1 Reports	Permanent
Affirmative Action Plans/Records	5 yrs.
Form 5500	6 yrs.
OSHA 300/300A	Posting date + 5 yrs.

Customer & Patient Education Plan

Introduction and Overview

The Company provides education to the medical marihuana patients which it serves, to help ensure the safe and effective use of cannabis. The education process starts when customers and patients first shop at Redbud as each receives an Education Handbook (attached hereto as **Ex. A**) the first time they shop.

The Company is committed to staying informed regarding commonly accepted marihuana practices, and will update and provide its Education Handbook to all customers, as updates are warranted. The Company is committed to teaching customers about the following core subjects:

- a. Types of marihuana used as medicine;
- b. Benefits and risks associated with marihuana;
- c. Dosage;
- d. Signs of abuse;
- e. Keeping marihuana away from children; and
- f. How to effectively communicate with medical professionals and law enforcement.

The Company will address these core subjects in the Education Handbook, as well as through other means, including but not limited to educational magazines, booklets; and brochures.

Monitoring and Preventing Over-Intoxication

To meet the CRA's requirements regarding monitoring and preventing over-intoxication, the Company intends to have the following procedures in place:

Refusing Service and Preventing Undue Intoxication

The Company's systems are designed to ensure customers are not permitted to purchase cannabis if they demonstrate habits or traits indicative of overuse or intoxication. Refusing service can be difficult, even moreso when trying to reason with an irrational, argumentative, or aggressive person.

Monitoring and Assessing Customers

The Managers are responsible for putting a control system in place to monitor and assess people entering the premises for signs of undue intoxication and disorderly conduct. This will typically occur at the security check in the vestibule, where customers are required to provide their valid state identification, as well as their medical marijuana card, if applicable.

Strategies To Prevent Undue Intoxication

- Stop customers who appear intoxicated at the front door. Has the customer been utilizing cannabis? Should the customers be admitted into the facility?
- Staff, security, and management will work together to continually monitor the waiting areas as well as the dispensing areas. This means communicating with each other regularly throughout the day.
- Do not provide entry or cannabis products to customers who are visibly inebriated or under the influence of alcohol or cannabis.
- Budtenders are required to assess customers each time they are attempting to purchase cannabis products.
- Ensure that lighting is bright enough and sound levels are low enough to enable staff to properly monitor customers' intoxication levels throughout the retail facility.
- Use signage to indicate that service will be refused to those that are unduly under the influence.

The above list is by no means exhaustive, and the Company will continue to implement further successful strategies for preventing customers from becoming unduly intoxicated.

Monitoring and Preventing Sales to Minors

To meet the CRA's requirements to monitor and prevent sales to minors, the Company will have the following procedures in place for checking identification before allowing access to the Restricted Access Areas of the marihuana retailer facility. The Company believes it is important to have a process for checking identification. The benefit of having this process is to build a routine among the Budtenders to ensure that the IDs are checked the same way each time, which will reduce the risk of missing something important.

All employees will be vigilant and do their part in preventing distribution and sales to minors. This practice is extremely important and one of the top priorities of the marihuana industry and the CRA. Cannabis is regulated in Michigan and is only legal for recreational adult use for adults above the age of 21 and qualifying medical patients. The Company guarantees that all store employees will share the compliance burden and responsibility to ensure that no person under the age of 21 can purchase retail cannabis or medical cannabis without proper medical identification. Anyone who cannot produce a form of valid identification proving they are 21 or older, and/or valid patient paperwork, will be refused service of marihuana and marihuana products.

The Company will follow the process below to qualify each customer before granting access to a Restricted Access Area:

HOW TO CHECK IDENTIFICATION

- Check The Expiration Date:
 - This is something that may be forgotten. When verifying an individual's age, an ID check generally starts by checking the date of birth. Always check if the ID is valid and not expired.

- Check the Date of Birth:
 - Do the math to ensure that the person is of legal age.
- Look at the Picture:
 - Compare the picture to the person in front of you. Does this match with the information on the ID (eyes, sex, etc.)? Be sure to take at least 10 seconds to review the ID.
- Turn the ID Around:
 - Look at the back of the ID to check if it has a barcode, magnetic strip, etc; Cross compare the ID to the security features in the Fraud ID book.
 - Does the ID look real and valid? Does the customer appear younger than the ID picture?

TYPES OF FAKE IDENTIFICATION

Many false or fake IDs look just a little bit off. Redbud will ensure that if the Budtenders have any doubts that the ID is valid to follow the steps below for how to identify false identification.

- **Counterfeit/Fake ID** – Identification that is produced to copy and imitate real IDs. Today, these IDs may be ordered online and arrive in a short amount of time for minors to use in obtaining marijuana or for out of state adults to use in increasing purchase limits.
 - ID Checking guide, detection equipment (UV), security features
 - Visual and physical ID check – specifically checking edges, type of bend, material
- **Altered ID** – An ID that is legitimate for the holder, but that has been altered with false birthdays, false fronts, or other attempts to change the information on the ID.
 - Under 21 or Vertical ID
 - Visual and physical ID check – specifically checking edges, type of bend, material
- **Borrowed ID** – The most common form of illegal ID in which the holder borrows a fake ID from an older family member or friend. Often, a closer inspection of the ID and questioning of the holder will help identify use of borrowed IDs.
 - Scrutiny of the ID compared to the user
 - ID information, discrepancy, and validation
 - Questioning of the holder on ID information

SECURITY FEATURES OF VALID IDENTIFICATION

Not all states use each of these features, but Redbud Budtenders will be aware of these options for each state and will consult the ID book to check for the following when applicable:

- **Ultra-violet (UV) Images** – Many modern IDs contain words, pictures, and designs on the front and/or back of valid IDs that are only visible using a UV light source.
- **Ghost Images** – Some states have smaller versions of the identifying picture used elsewhere on the ID and should be somewhat transparent. Fake IDs may have the standard photo reduced and lightened but not “ghosted”.
- **Kinegrams** – More often used on international passports than State IDs, this feature is similar to a holographic image except that the image appears with different colors and patterns depending on the angle the ID is being viewed in.
- **Optical Variable Device (OVD)** – When moved around, this security feature also changes colors depending on the angle, but it is combined with micro-print to be examined by magnification as well.

- **Laser Light Feature** – As a newer security feature, a laser pointer may be used on a specific point of the ID in which a letter or image will reflect off. It is not the easiest method to check as you must use a flat surface and dark lighting conditions to verify this feature.
- **Opacity Mark** – Another newer feature in which an embedded, tiny, perforated marking is made visible through the ID when held up to a light source. The pattern varies state to state and is an internal feature within the ID that cannot be detected by feeling.
- **Embossed dates/Information** – Embossed information and/or embossed ink raises off the ID like numbers on a credit card. It is a newer feature and may alter with wear.
- **Barcodes, Data Chips, and Magnetic Stripes** – Magnetic Stripes are one of the most common security features containing the information about the ID holder and are now programmable and easier to copy. States are now using more barcoding and RFID chips to store electronic information.
- **Micro Printing & Nano Printing** – Security feature involving tiny print that cannot be read (or easily duplicated) with the naked eye. This may appear in lines with the ID or as a part of images and patterns on the ID. Using a magnifying glass, these features should be identifiable on valid IDs.
- **Holographic Images** – Holograms are 3D images that move around or jump from the document. For many states, this is a feature used with the State Seal.

SAMPLE PROPER IDENTIFICATION CHECKING STEPS

- Greet customer.
- Have customer remove ID from wallet.
- Look at person and check against ID picture.
- Check physical description (hair color, eye color, height, weight).
- Check ID information (dates, state, holograms, etc.).
- Check expiration.
- Check for tampering.
- If in doubt, ask for another form of ID and check photograph, information, physical description, and signature.

EXHIBIT A to Staffing Plan

EDUCATION HANDBOOK

218 E. Stockbridge.
Kalamazoo, MI 49001

I. INTRODUCTION TO MEDICAL CANNABIS

Cannabis is a plant that has been used for many different purposes for thousands of years, including fiber for paper and clothing and fuel, and nutritionally as a source of high-quality dietary oils and protein as well as for many different medical purposes.

Medicinally, the mature plant's flowers and leaves have been used in a variety of forms because they contain a resin filled with terpenes and cannabinoids, such as THC, which causes certain psychoactive and physical reactions, and CBD, or cannabidiol, a powerful anti-inflammatory and antioxidant

THC, or delta-9-tetrahydrocannabinol, is the main cannabinoid responsible for the psychoactive effects, while other cannabinoids such as CBD, cannabigerol (CBG) and cannabichromene (CBC) are thought to have many other beneficial properties.

II. ACTIVE INGREDIENTS IN CANNABIS

Scientists have discovered several hundred terpenes and about 70 cannabinoids in marijuana. Each cannabinoid produces certain effects, which may be modified in as yet unclear ways by the terpenes, and possibly by other compounds such as flavinoids.

A great deal of research has been done on the medical uses of cannabis, especially in the last 25 years since the discovery of the "endocannabinoid system", an important regulatory system that keeps other body systems in balance. Stimulation of endocannabinoid receptors (called CB1 and CB2 receptors) by compounds produced by the human body or by cannabinoids from the cannabis plant results in the medical effects for which cannabis has been used for nearly 5,000 years.

The cannabinoids that are thought to be primarily responsible for the medical effects observed with cannabis include:

- Cannabichromene, or CBC, which provides pain relief and calming effects;
- Cannabidiol, or CBD, which treats anxiety, convulsions, inflammation and nausea without causing psychoactive effects. CBD also has neuroprotectant and antioxidant effects;
- Cannabinol, or CBN, which reduces the occurrence of seizures and lowers intraocular pressure;
- Cannabigerol, or CBG, which also lowers intraocular pressure, promotes relaxation and contains antimicrobial properties;
- Delta-9-Tetrahydrocannabinol, or THC, which treats a wide variety of medical problems, such as pain and nausea, and it has the strongest psychoactive effect of all of the cannabinoids found in marijuana;
- Flavonoids, terpenes and terpenoids, which create the smell and flavor of each cannabis strain, increase circulation and may treat a variety of skin conditions;
- Tetrahydrocannabivarin, or THCV, shows positive results for metabolic disorder and type 2 diabetes treatment.

III. CANNABIS STRAINS AND THEIR USES

Medical cannabis is available in more than one hundred varieties, all of which offer unique combinations of effects. Therefore, within certain broad categories, physicians may recommend that their patients test different varieties to find the one that most suits their needs.

There are four main categories of strains:

- sativa,
- indica,
- sativa/indica hybrids; and
- high-CBD.

The specific concentration of each cannabinoid is different by plant and strain. It is important to note that much of the information on strain-specific effects is anecdotal. Studies are now being designed that will shed new light on the following generally-accepted strain specific effects. Please bear in mind that some patients respond differently to the various cannabis strains than might be expected from the general guidelines below.

- a. **CANNABIS SATIVA:** The sativa strain, native to tropical climates, is tall and tree-like with thin leaves. Sativa strains tend to mentally stimulate and energize the patient, making it suitable for use during daytime hours. Patients may also experience feelings of euphoria when taking sativa cannabis. Negative side effects are rare and mild, but feelings of paranoia and anxiety may be caused or amplified. The sativa strain is thought to be helpful for treating problems such as:
 - i General abdominal complaints;
 - ii Depression;
 - iii Headaches;
 - iv Fatigue;
 - v Lack of Appetite.
- b. **CANNABIS INDICA:** The indica strain was first grown in temperate climates. Indica strains are shorter and have broader leaves than their sativa counterparts. Those who take an indica strain may experience a sedated or relaxed feeling, so patients usually get the best results when taking it at night. Indica is thought to be useful in treating:
 - i Anxiety;
 - ii Insomnia;
 - iii General Pain;
 - iv Muscle Spasms.

- c. **CANNABIS SATIVA/INDICA HYBRIDS:** The most commonly used cannabis strains are sativa/indica hybrids. Growers created various hybrids to give medical cannabis patients the benefits of both sativa and indica for optimal results. Each hybrid is typically either a sativa or indica dominant crossbreed. Hybrids tend to work well for treating:
 - i Lack of Appetite;
 - ii Nausea.
- d. **Cannabis High-CBD:** The cannabis varieties in this strain have been laboratory tested and were found to have high cannabidiol, or CBD, levels. High-CBD strains offer several health benefits without a large degree of psychoactive effects, allowing patients to work and drive while taking therapeutic doses. Medicinal high-CBD strains are an excellent option for people who need to treat:
 - i Anxiety;
 - ii Inflammation;
 - iii General Pain;
 - iv Seizures;

IV. PRODUCTS AND DOSAGE METHODS

There are multiple dosage methods for cannabis usage: inhalation, ingestion and topical applications. Each method produces a unique medicinal effect, even if the patient uses the same strain in different ways.

a. INHALATION

Takes Effect in 1-5 Minutes

Effects Last 1-4 Hours

Many patients choose to inhale cannabis via a rolled joint, pipe or vaporizer because these dosage methods are convenient and fast acting. However, respiratory tract irritation is a short-term side effect. Current research finds that the long-term side effects of smoking cannabis are minor, however habitual and heavy smoking of cannabis may cause phlegm production, bronchitis and chronic coughing. Cannabis smoke is known to have substances that cause cancer, called carcinogens. When studied at a molecular and cellular level, the cannabinoids in marijuana are shown to lower the effect of the smoke's carcinogens and no verified cases of lung cancer or other lung diseases have been found in cannabis smokers.

Kief and hashish, or hash, are two popular cannabis products. Kief is a powdered substance made from the resin glands of marijuana plants. Kief is compressed to create hash. Hash has a paste like texture and a THC content that ranges from 15 to 70 percent. Kief and hash may be inhaled or ingested.

Extracted from mature cannabis foliage, hash oil is a combination of the resin and other essential oils. Hash oil ranges in THC content from 30 to 90 percent. This oil can be added to food or smoked in a joint, pipe or specialty hash pipe.

b. INGESTION

Takes Effect in 1-2 Hours

Effects Last 6-8 Hours

Cannabinoids reach maximum potency when heated, and they are fat-soluble. Therefore, cannabis may be added to many drinks and foods. Heat is necessary to create active THC and CBD. Since ingested cannabis is processed by the body's liver, patients may experience stronger and longer-lasting psychoactive effects, especially when using products high in THC. The most common ways to ingest cannabis are through

- Cannabis butter, which is cannabinoid-infused butter
- Cannabis oil, which is made in a similar manner to cannabis butter, is a blend of cooking oil and cannabinoid resins
- Cannabis liquor, which is an infusion of leaves and stems with rum, brandy or other alcoholic beverages
- Cannabis beverages, which includes coffee and tea. Since the cannabis resins are not soluble in water, some form of oil must be added to coffee or tea to ensure that the resins dissolve in the beverage.

c. TINCTURE

As concentrated cannabis liquids, cannabis tinctures take effect in 5-30 minutes with effects lasting 1-6 hours. The fastest way to introduce a cannabis tincture to the body is by holding a few drops under the tongue for one minute before swallowing the liquid. This product has a low odor, and it is easy to dose. Tinctures also come in sublingual sprays.

d. PILLS AND SPRAYS

Effects are very similar to those resulting from the preparations above.

Several prescription cannabis-based medications are available in pharmacies. Dronabinol, a Schedule III drug, is a capsule that contains synthetic THC in sesame oil and can be prescribed by physicians. These pills do not contain any of the other cannabinoids, and they are designed to treat weight loss and lack of appetite in AIDS patients as well as vomiting and nausea in chemotherapy patients. Sativex is a mouth spray that is used to treat aggravating symptoms in cancer and MS patients, such as overactive bladder, spasticity and neuropathic pain. Sativex is not yet available in the United States.

e. TOPICAL

Takes Effect in Varying Times

Effects Last for Varying Times

The plant and oil extracts can be added to lotions, salves and balms to make topical products.

Topical cannabis does not create psychoactive effects in patients. These products are effective at reducing pain and inflammation. Topical cannabis can treat numerous ailments, such as:

- Allergic Skin Reactions;
- Inflammation;
- Muscle Strains;
- Post-Herpetic Neuralgia;
- Swelling.

V. ADDITIONAL NOTES

Although cannabis has an extraordinary record of safe and effective use spanning many centuries, it is important to use as little as is needed to achieve the medical benefits for which it was recommended by your doctor. Less may well be more when using medical cannabis. Bear in mind that cannabis has a biphasic dose-response curve, which means that symptoms that are improved by using cannabis at low doses may be exacerbated, or made worse, when it is used in high doses. Nausea is a good example of this. At low doses, marijuana can prevent nausea, while in high doses, it can create nausea or make it worse.

a. NEGATIVE SIDE EFFECTS

Reported by anecdotal evidence and scientific research, cannabis in all its forms is a very safe treatment. Usually, any negative side effects are easily tolerated and mild. Anxiety attacks, convulsions and temporary psychosis are very rare complications, typically caused by ingesting too much edible cannabis or smoking cannabis high in THC and are more likely to occur in patients who have never used medical marijuana or novice or use it infrequently.

It is impossible to fatally overdose on cannabis. Over time with regular use and dosage adjustments, many of the psychoactive effects are decreased. The possible negative side effects of cannabis usage include:

- Decreased sperm count (seen only in animal experiments and not yet in humans)
- Drowsiness
- Eye redness
- Impaired psychomotor performance
- Hunger
- Short attention span
- Short-term temporary memory loss
- Thirst
- Uneasiness
- Euphoria
- Decreased REM sleep patterns

VI. PRECAUTIONS

Long-term, heavy cannabis use may impact reproductive hormones, possibly causing decreased sperm counts, however, it does not cause infertility. There is evidence in animals that fetal exposure to cannabis may carry a higher risk of cognitive deficiencies, small birth weight and premature delivery, but there is no research evidence of similar effects in humans. Nonetheless, it is important for women who are pregnancy or may become pregnant to avoid using cannabis until scientific research can definitively determine whether its use in pregnancy also has negative effects in humans.

While cannabis is shown to improve mental conditions, such as ADHD, PTSD, bipolar disorders, depression and anxiety, some patients may find that cannabis aggravates the symptoms of their disorder. Therefore, patients who have been diagnosed with a mental illness are encouraged to consult with their doctors before using medical cannabis, and regularly while using it

Although there is conflicting research on whether cannabis use in hepatitis C is beneficial or detrimental, patients diagnosed with hepatitis C should be judicious in their use of cannabis.

Patients who smoke cannabis from a water pipe on a regular basis should change the water often to reduce the accumulation of bacteria and viruses.

Cannabis patients should refrain from driving for a minimum of two hours after using marijuana by inhalation and should carefully assess their ability to drive or carry out complex tasks after using tinctures or especially ingested cannabis products. Keep in mind that cannabis can cause impairment of motor skills that may last for several hours, and that driving under the influence of cannabis, especially THC, is considered a crime in most states.

VII. DRUG INTERACTIONS

Cannabis may intensify the effects from opiate and hypnotic medications. Initial studies have found cannabis to interact with medications such as antihistamines, barbiturates, disulfiram, fluoxetine, and theophylline, and may alter the metabolism of antiepileptic medications.

Caution should be used when mixing cannabis and alcohol due to the combination's ability to amplify the effects of both substances, known as a synergistic effect. Research in France has shown that the degree of impairment resulting from the combination is alcohol and cannabis is greater than either alone, and may last longer as well.

Explanation of Economic Benefits to the City of Kalamazoo

Redbud is a vertically integrated cannabis company headquartered in Buchanan, Michigan. Our mission is to provide the highest quality cannabis and cannabis infused products through a safe, friendly, and community focused cannabis dispensary.

Our team of business leaders and cannabis entrepreneurs have over 20 years of combined expertise in cannabis cultivation and processing, retail and sales, economic development, government & political affairs, real-estate development and customer service. We are determined to increase community awareness of the medicinal benefits of cannabis, while reducing the stigma often associated with use of cannabis.

Our passion and subject matter expertise are evident across the industry supply chain in Michigan, where we have embraced industry best practices as a licensed cultivator, processor, and retail facility. We believe the people of Kalamazoo and surrounding suburbs have and will continue to benefit greatly as we leverage our industry expertise to form alliances with statewide partners and bring the absolute highest quality cannabis in a safe and friendly environment.

Since opening its doors in Kalamazoo in 2021, Redbud has continued to deliver on our mission to positively impact individuals as well as communities. Redbud sells the safest, highest-quality products, featuring rigorous cultivation, processing, and secure professional packaging that meet or exceed state requirements. Additionally, Redbud continues to focus on legally compliant, financially sound, and community responsive operations. We use the diverse backgrounds and combined experience of our team of highly skilled professionals in patient education, customer service, business operations, and compliance to manage all aspects of this highly regulated industry with consumer's needs and safety in mind.

As an organization, safety for our employees and the surrounding communities is of upmost importance to Redbud. The presence of our facility and the security systems for the facility and surrounding area, will continue to help to reduce crime, increase commerce, and have a positive impact in the community.

Economic Benefits to Local Community

Jobs Opportunities

Redbud's initial staffing plan for the city of Kalamazoo had an estimate of a total of 10 full-time employees and 2 part-time employees with compensation ranges from \$14.00 per hour to an annual salary of \$65,000. At that time, Redbud's estimated annual spend on employee's salaries was approximately \$419,640.

Currently, Redbud employs 15 full-time and 14 part-time employees with compensation ranging from \$17.00 per hour to an annual salary of \$78,000 with a total estimated annual spending on employees' salaries of \$972,400.

Based on these employment numbers, Redbud has more than doubled the jobs available to the residents of Kalamazoo from its initial staffing plan and has increased its starting wage for all positions to an even more livable wage.

Revenue Circulated into Local Economy

As indicated above, over the past year, Redbud has provided job creation and growth for the residents of Kalamazoo. With the majority of Redbud’s Kalamazoo facility’s employees being Kalamazoo residents, the recirculation of funds is not only limited to the “business day.” This benefit is two-fold, to the actual resident in the form of a job and livable wage salary, and to the city of Kalamazoo where funds are being circulated back into the local economy.

Redbud has generated approximately 20 million in gross revenue in the past year. The revenue generated not only converts to local taxes that Redbud has and/or will pay, on top of the city and state licensing fees, but it also feeds back into the local community in the form of taxes and use of local suppliers for business needs.

Employees and owners shop locally, eat at local dining establishments, and often encourage others to adopt the same attitude of “supporting local.” Additionally, Redbud’s current sales model has helped to keep the local market diverse. By developing and maintaining its current sales model, Redbud adds to the tourist appeal (even if just a daily tourist) appeal of the area, which, in turn, helps to drive funds back into the local community.

Whenever possible, Redbud has made a point to use local Kalamazoo businesses for services and supplies necessary. Currently, Redbud utilizes legal services and utility providers in Kalamazoo.

Good Neighbor Policy

The facility management team continues to be committed to building and maintaining good relationships with all its neighbors—including local businesses, local representatives, building owners, and residents alike. The facility team shall make every effort to act and fund initiatives in the local communities we operate in to help those in need. As such, in conjunction with other initiatives outlined in this document, Redbud continues to take the following steps to ensure any concerns within the community are addressed:

- a. Work with the local police department to help with open investigations by providing camera footage of the surrounding streets or interior of facility as requested.
- b. Make educational information available to discuss the benefits of marijuana and the company’s overall mission and goals.
- c. Open feedback channels so any new concerns can be immediately addressed through our website, telephone, or mail.
- d. Complete compliance with all state and local ordinances.
- e. Continue with non-obtrusive business practices to ensure our business is discreet and operates like any other business.
- f. No blatant signage with offensive symbols or verbiage.
- g. Utilize unmarked discreet transportation vehicles.

Community Outreach

At Redbud, we believe action speaks louder than words. While most cannabis company’s *talk* of “partnering” with municipalities, Redbud has a history of integrating and, more importantly, employing local residents. Redbud has established Be a Bud, which is a program designed and led by multiple Redbud administration members and employees from multiple Redbud facilities.

Throughout the year of 2022 and ongoing into 2023 Redbud has been privileged to give back to its communities in several ways such as volunteer labor hours, education opportunities, collecting donations for those in need, or sponsorship.

Education

Western Michigan University

Redbud, in conjunction with Fresh Thyme CBD, is currently working with Western Michigan University for a Cannabis Marketing class during the Spring 2023 semester. This is a course that is designed to equip the student with the necessary tools and background to successfully enter the cannabis industry. As the push to legalize recreational marijuana nationally continues, coupled with the increased popularity of other cannabis products, it is necessary to focus on the history, development, overlap of cannabinoids, effects on homeostasis and the Endocannabinoid System, the THC and CBD culture, uses, etc., to better prepare the student to prosper in the cannabis industry. This class will help certify the student in the basics of cannabis marketing, plus the basics in provisioning center expertise.



Wayne State University Veteran Study

Redbud is teaming up with Wayne State University for the purpose of conducting research studies on the effects of cannabis on behavioral health among veterans. The overall goal of this research program is to provide evidence-based information to the scientific community and public on the impact of cannabis and cannabinoids on depression, post-traumatic stress disorder, suicidal thoughts and behaviors, and other behavioral and mental health outcomes in veteran populations. Redbud is supplying the cannabis products for the research study.

Donations and Sponsorships

Throughout the last year, Redbud has taken up donations and/or provided sponsorships to several organizations throughout the state of Michigan. Some of them have been:

- Purses with a Purpose – Sexual Assault Awareness



- Food Donations for Hunger Action Month



- Arbor Day with Tree Friends



- Puff n' Putz Charity Golf Outing



Volunteer Hours

Redbud employees love to give back to their communities by volunteering their time to help local organizations and causes. While Redbud does not offer official Volunteer Time Off (VTO) hours at this point, Redbud does pay its employees for any volunteer time done during their regularly scheduled workday when done in conjunction with Be a Bud. Because of this, more employees have become active in their communities and have brought forth causes that are important to them to be involved in. Some of the organizations employees have volunteered their time with in the last year are:

- Food delivery and hand out with Love, Inc.



- Memorial Day Flag Planting;



- Blues'd and Infused Cannabis Festival;



- Fernwood Lights;



- Community Garden Clean Up;



- Redbud Motocross Lucas Oil Championship;



Social Equity and Diversity Plan

Introduction

Redbud is a vertically integrated cannabis company headquartered in Buchanan, Michigan. Our mission is to provide the highest quality cannabis and cannabis infused products through safe, friendly, and community focused cannabis dispensaries.

Our team of business leaders and cannabis entrepreneurs have over 20 years of combined expertise in cannabis cultivation and processing, retail and sales, economic development, government & political affairs, real-estate development and customer service. We are determined to increase community awareness of the medicinal benefits of cannabis, while reducing the stigma often associated with use of cannabis.

Our passion and subject matter expertise are evident across the industry supply chain in Michigan, where we have embraced industry best practices as a licensed cultivator, processor, and retail facility. We believe the communities we have facilities in have and will continue to benefit greatly as we leverage our industry expertise to form alliances with statewide partners and bring the absolute highest quality cannabis in a safe and friendly environment.

Since opening our doors in 2019, Redbud has continued to deliver on our mission to positively impact individuals as well as communities. Redbud sells the safest, highest-quality products, featuring rigorous cultivation, processing, and secure professional packaging that meet or exceed state requirements. Additionally, Redbud continues to focus on legally compliant, financially sound, and community responsive operations. We use the diverse backgrounds and combined experience of our team of highly skilled professionals in patient education, customer service, business operations, and compliance to manage all aspects of this highly regulated industry with consumer's needs and safety in mind.

Approach to Social Equity

Redbud understands the value of diversity. It strives to impact areas and individuals disproportionately impacted by prior cannabis prohibition across the state through concerted execution of the company's Social Equity and Diversity Plan. This plan utilizes an affirmative action policy, establishes employee diversity goals and workforce utilization report policy, diversity-oriented outreach and events, policy for contracts with diverse groups, and mentoring and professional development programs. Redbud will apply its social equity and diversity plan to positively impact communities of all locations in the state of Michigan.

The company will implement business practices aligned with its quality-forward, social-entrepreneurial mission to maximize the socio-economic benefits that legal cannabis potentiates. Foremost among these practices is inclusion at every opportunity, from geography to personnel to vendor selection.

The company's Social Equity and Diversity Plan will be applied in all markets where it operates; it will produce, for one example, a workforce that is notably diverse in race/ethnicity, gender identity, sexual preference, and veteran status —moreover, these workforces will be local to and reflect the unique communities in which we operate.

The company will create economic opportunity for diverse individuals, specifically people of color from communities most harmed by cannabis prohibition, by implementing a diversity focused hiring strategy. Out of the ten full-time employees that will work at its facility, at least two of the employees must be women and two must be minorities. Also, apart from managers, all employees must have resided in a 25-mile radius of the facility

within the past 6 months. The company’s employees will earn competitive wages and receive a full benefits package and enjoy internal promotion and career advancement opportunities in a growing company.

Our leadership team seeks to be generous and transparent with institutional knowledge and serve as a resource and steward of the nascent cannabis industry— and consider that effort, while less measurable, to be one of the most valuable contributions the company can make towards rectifying harms against communities of color and others disproportionately impacted by cannabis prohibition.

Social Equity Plan

Employment Opportunities

Redbud strives to be an inclusive company made up of talented and diverse individuals from many ethnicities and cultures. The Company will prioritize residents of each community it operates in during the hiring process for open positions. Redbud has developed an action plan to inform, hire, and educate minorities, women, veterans, state residents, and disabled persons. The Company’s executive team is committed to building a company with fair treatment, access, opportunity, and advancement for people of all demographic backgrounds, and believes deeply that it is the company’s responsibility to take care of the people that take care of them. Currently in Kalamazoo, Redbud has a total of 29 employees. Of those 29 employees, 14 employees are female, 13 employees are persons of color, and 6 employees have prior marijuana convictions.

Communities Disproportionately Impacted

Redbud currently employs people across its company from several communities that have been disproportionately impacted by marijuana prohibition and enforcement. Redbud has employees who reside in the following cities:

- Benton Harbor
- Berrien Springs
- Dowagiac
- Eau Claire
- Edwardsburg
- Kalamazoo
- Muskegon
- Niles
- Watervliet

Diversity & Inclusion

It is the policy of Redbud not to discriminate against any employee or any applicant for employment because of age, race, religion, color, handicap, sex (including sexual orientation or gender identity), physical condition, developmental disability, or national origin. This policy shall include, but not be limited to, the following: recruitment and employment, promotion, demotion, transfer, compensation, selection for training including apprenticeship, layoff, and termination.

Redbud has an Equal Employment Opportunity Officer, and they are responsible for planning and implementing the Company’s affirmative action plan, as well as for its day-to-day monitoring of affirmative action-related decisions and activities. All personnel who are responsible for hiring and promoting employees and for the

development and implementation of programs or activities are charged with supporting this. They shall provide leadership in implementing affirmative action goals and initiatives.

The Company shall abide by all state regulations and federal laws relating to equal employment opportunities and affirmative action. The Company shall continue to work cooperatively with government and community organizations to take affirmative action to ensure equal employment and advancement opportunities for all individuals.

More specifically, Redbud will ensure that at least 25% of its employees are of minority and/or female.

Positive Impact Plan

The company recognizes the disproportionate impact the war on drugs has had firsthand on communities. That is why it embraces diversity and plans to have a positive impact within its community by offering educational resources on cannabis, fostering the destabilization associated with cannabis use, and partnering with and supporting organizations at the local, state, and federal levels that provide services to individuals and communities disproportionately harmed by cannabis prohibition through contribution of financial resources, education, and/or subject matter expertise. With Redbud able to provide professional and technical consulting services and mentoring for individuals and business this will help reduce systemic barriers to entry in the cannabis industry.

Corporate Spend

Redbud aims to have up to 5% of its operational expenses be with diverse suppliers that are at least 50% owned and operated by an individual or group in one of the following categories: minorities, women, veterans, tribal, LGBTQ, and people with disabilities. A short list of current suppliers who meet this criterion are:

- TreeTown;
- Narvono;
- Primitiv;
- Viola;
- Premiere Provisions;
- Noble Road; and
- 1st Quality Medz

Corporate Re-Investment

At Redbud, we believe action speaks louder than words. While most cannabis company's *talk* of "partnering" with municipalities, Redbud has a history of integrating and, more importantly, employing local residents. Redbud has established Be a Bud, which is a program designed and led by multiple Redbud administration members and employees from multiple Redbud facilities.

Throughout the years Redbud has been privileged to give back to its communities in several ways such as volunteer labor hours, education opportunities, collecting donations for those in need, or sponsorship.

Education

Redbud, in conjunction with Fresh Thyme CBD, is currently working with Western Michigan University for a Cannabis Marketing. This is a course that is designed to equip the student with the necessary tools and background to successfully enter the cannabis industry. As the push to legalize recreational marijuana nationally continues, coupled with the increased popularity of other cannabis products, it is necessary to focus on the history, development, overlap of cannabinoids, effects on homeostasis and the Endocannabinoid System, the THC and CBD culture, uses, etc., to better prepare the student to prosper in the cannabis industry. This class will help certify the student in the basics of cannabis marketing, plus the basics in provisioning center expertise.

Donations and Sponsorships

Redbud has taken up donations and/or provided sponsorships to several organizations throughout the state of Michigan. Some of them have been:

- Purses with a Purpose – Sexual Assault Awareness
- Food Donations for Hunger Action Month
- Arbor Day with Tree Friends
- Puff n’ Putz Charity Golf Outing;
- Sponsored a local biking event in which participants rode in an effort to raise awareness of Parkinson’s disease;
- Annual participation in “Movember” fundraisers to raise donations for and awareness of men’s health issues, such as prostate cancer, testicular cancer, and men’s suicide;
- Annual participation in “Pink-Outs” where employees are permitted to wear their favorite pink gear to raise awareness of breast cancer;
- Sponsored and provided t-shirts for a 5K run.
- Regularly partners with other license holders in the state for charity drives where a portion of proceeds of product sold is sent to different charities.
- Coat drive for Women’s Shelters

Volunteer Hours

Redbud employees love to give back to their communities by volunteering their time to help local organizations and causes. While Redbud does not offer official Volunteer Time Off (VTO) hours at this point, Redbud does pay its employees for any volunteer time done during their regularly scheduled workday when done in conjunction with Be a Bud. Because of this, more employees have become active in their communities and have brought forth causes that are important to them to be involved in. Some of the organizations and ways employees have volunteered their time are:

- Food delivery and hand out with Love, Inc.
- Memorial Day Flag Planting;
- Blues’d and Infused Cannabis Festival;
- Fernwood Lights;
- Community Garden Clean Up;
- Redbud Motocross Lucas Oil Championship;
- Cleaning up and planting trees at local dog parks;

Social Equity All-Star

While Redbud has not yet applied for the Michigan Cannabis Regulatory Agency's Social Equity All-Star program, it plans to do so in the near future. Redbud believes that with its current plan as laid out above it would qualify, at the least, as a Silver Social Equity All-Star. It is Redbud's intention to obtain Gold Social Equity All-Star status.

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ILY9TL01
Rev. 09/17/2015
02/22/1986



Blood Type
RH Factor

Medical Information/Living Will
Seal Area

www.CYBERDRIVEILLINOIS.com

Class: Single Veh GVWR 16000 or Less Except Cycles

Endorsements: NONE

Restrictions: B -Corrective Lenses

1818

ILLINOIS

Jesse White • Secretary of State

USA

DRIVER'S LICENSE

Federal Limits Apply

4d LIC NO: L520-0138-6053

3 DOB: 02/22/1986

4b EXP: 02/22/2023

4a ISS: 03/08/2019

1 LEONOWICZ
2 ALEXANDER MICHAEL
8 1243 W OHIO ST UNIT 1
CHICAGO, IL 60642

9 CLASS: D

9a END: NONE

12 REST: B

15 SEX: M

16 HGT: 6'-02"

17 WGT: 205 lbs

18 EYES: BRN

5 DD 20190308306CC5822

TYPE: ORG





GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

ORLENE HAWKS
DIRECTOR

May 12, 2023

Redbud Roots, Inc.
215 Post Road
Buchanan, MI 49107

The Cannabis Regulatory Agency's social equity team reviewed your form for the Social Equity All-Star Program and would like to congratulate you on your acceptance into the program at the gold level. The following license numbers will be displayed on our website under the gold level. These license numbers were provided on your form:

Redbud Roots Lab II, LLC	Redbud Roots Lab IV, LLC	Redbud Roots Lab VI, LLC	Redbud Roots Lab VIII, Inc.
• AU-G-C-000132	• AU-P-000112	• AU-R-000367	• AU-R-000273
• AU-G-C-000153	• AU-P-000141		
• AU-G-C-000503			
• AU-G-C-000969			

Now that you have been accepted into the Social Equity All-Star Program here are some important things to know:

- You are being awarded a digital copy of your Social Equity All-Star Program Gold seal. Feel free to use this seal on your website, social media, or in your licensed establishment(s) in any way that makes sense to highlight the establishment's efforts.
- Acceptance into this program is only valid for one year. In order to remain active in the program you will need to submit a Social Equity All-Star Program Renewal form each year you want to participate.
 - If at any time you would like to update your plans on the CRA website, you can email us your updated plan along with the [Social Equity All-Star Program Amendment form](#).

If there are any questions regarding this acceptance letter, please contact the social equity team via email at CRA-SocialEquity@Michigan.gov.

Thank you,

Social Equity Representative
Cannabis Regulatory Agency
www.michigan.gov/CRA