

Complaints to the Medical Marijuana Commission

Subject: Commissioner Travis Story Bias

1. Arkansas Administrative Procedures Act excerpt about personal bias
2. Affidavit of Personal Bias about Commissioner Story submitted to the Medical Marijuana Commission by Nick Landers, an owner of New Day Cultivation
3. Affidavit of Personal Bias about Commissioner Story submitted to the Medical Marijuana Commission by Storm Nolan, owner of River Valley Relief Cultivation
4. “The smell also rises: What did Travis Story know about marijuana applicant and when did he know it?” Arkansas Times by Max Brantley, March 9, 2018
5. “Let’s Be Blunt: Bob Ballinger’s Suspicious Ties to Medical Marijuana Licensing” Blue Hog Report by Matt Campbell, August 6, 2018
6. “Text messages shed light on inner workings of Arkansas Medical Marijuana Commission” Arkansas Democrat-Gazette by Hunter Field, March 9, 2018
7. “Losing marijuana bidder files ethics complaint against Travis Story” Arkansas Times by Max Brantley, March 10, 2018
8. “Arkansas pot-case conflict filing rejected” Arkansas Democrat-Gazette by Hunter Field, June 23, 2018
 - a. Rejected because the awarding of medical marijuana licenses is not considered a procurement matter

Subject: Out of State Ownership

10. “Medical marijuana firm touted its Arkansan roster, but filing didn't broach Canada stake” Arkansas Democrat-Gazette by Hunter Field, January 27, 2019
11. Amendment 98 (medical marijuana) excerpt showing 60% Arkansas ownership requirement

Subject: Protests to the Medical Marijuana Commission (MMC)

20. Complaint letter from Naturalis Health (cultivation applicant) to the MMC alleging malfeasance, misrepresentation, and fraud
 - a. Contains a statistical analysis conducted by a doctor of philosophy, master of public health in epidemiology and biostatistics, and professor of statistics and research practice

- b. Concludes that “the methods in which the applications were scored were inconsistent”
21. Complaint letter from Delta Cannabinoid Corp. to the MMC alleging (among others) that the commission’s review, selection, and scoring decisions were arbitrary and capricious
 22. Complaint letter from River Valley Relief Cultivation to the MMC alleging significant misrepresentations on the Delta Medical Cannabis Company (one of the five successful cultivation applicants) application relating to the only two individuals on their team with cannabis cultivating experience
 23. Complaint letter from Southern Roots to the MMC alleging that Chairwoman Dr. Ronda Henry-Tillman changed her cultivation scoring after the deadline for submission of final scoring had passed
 24. Complaint letter from Nello Labs of Arkansas to the MMC regarding rules for bonus point scoring in relation to definition of ‘minority’ and the location-based bonus in relation to the Arkansas Economic Development Commission Incentive Tier Map
 25. Complaint letter from River Valley Relief Cultivation to the MMC documenting state residency discrepancies relating to one of the owners of Natural State Medicinals Cultivation (one of the five successful cultivation applicants)
 26. Complaint letter from Onyx Wellness to the MMC reiterating Judge Wendell Griffin’s ruling that Commissioners Travis Story and Dr. Carlos Roman had “pecuniary relationships with [applicants]... that created the appearance of bias in violation of due process”
 27. Complaint letter from Arkansas Medicinal Source to the MMC requesting an adjudication hearing in compliance with Arkansas Amendment 98
 28. Complaint letter from Naturalis Health to the MMC requesting an adjudication hearing in compliance with Arkansas Amendment 98
 29. Complaint letter from Clear Creek Cannabis to the MMC requesting an adjudication hearing in compliance with Arkansas Amendment 98
 30. Letter from Representative Scott Baltz to Larry Walther, Director of the Department of Finance and Administration, about tax delinquencies among the top ten cultivation facility applications which would violate the MMC’s own Rules and Regulations

31. Complaint letter from Darren Anderon of the Anderson Law Firm to the MMC documenting that the Bold Team's (one of the five successful cultivation applicants) application did not conform to the MMC's own Rules and Regulations in regards to property owner consent

Subject: Dispensary Support for Releasing Remaining Licenses

40. Testimony of Dragan Vicentic, owner of Green Springs Medical dispensary in Hot Springs, the highest volume dispensary in Arkansas, at the June 8th, 2020 Medical Marijuana Commission meeting
 - a. Advocating to release remaining cultivation licenses
 - b. Calls for an end to cultivation facilities being allowed to buy multiple dispensaries which creates an adverse situation for other dispensary owners
 - i. Amendment 98 prevents ownership of more than one cultivation facility and one dispensary
41. Letter from Ed Pat Wright, owner of Hickory Hill Pharmacy dispensary in Helena, to the Medical Marijuana Commission advocating for the remaining licenses to be released
42. Letter from Dragan Vicentic, owner of Green Springs Medical dispensary in Hot Springs, the highest volume dispensary in Arkansas, to the Medical Marijuana Commission advocating for the remaining licenses to be released
43. Email from Michael Wilkins, owner of Pine Bluff Agriceuticals in Pine Bluff, to Doralee Chandler, Director of the ABC, advocating for the remaining licenses to be released
44. Email from Dragan Vicentic, owner of Green Springs Medical dispensary in Hot Springs, the highest volume dispensary in Arkansas, to Senator Alan Clark documenting medical marijuana product shortages
45. Email from Mleah Webb, previous manager of Custom Cannabis dispensary in Alexander, about medical cannabis supply issues

Subject: Patient Support for Releasing Additional Licenses

50. "Poll: Support grows for medical marijuana expansion" Talk Business & Politics, June 12, 2020
 - a. Documents that 70% of Arkansas medical marijuana supporters favor the expansion of dispensaries and cultivation facilities in Arkansas
 - b. The other 30% either supported legal recreational cannabis or were unsure

51. Collection of comments from 43 Arkansas medical marijuana patients advocating for more dispensaries and cultivation facilities in Arkansas
52. “Arkansas Medical Marijuana Commission should release additional approved licenses” Times Record by John Lovett, April 26, 2020
53. Testimony of Melissa Fults, President of the Arkansas Drug Policy Education Group, in front of the MMC at the June 16, 2020 meeting advocating for releasing the remaining dispensary and cultivation licenses to help bring down medical cannabis prices and to increase patient access
 - a. https://www.myarkansaspbs.org/arcan/events/archived_events_folder/httpswww.myarkansaspbs.orgarcaneventsarchived_events_foldermedical_marijuana_commission-158526
54. Testimony of Representative Jay Richardson, District 78, in front of the MMC at the June 16, 2020 meeting advocating for jobs and economic development in Fort Smith and for releasing the remaining dispensary and cultivation licenses to help bring down medical cannabis prices and to increase patient access
 - a. https://www.myarkansaspbs.org/arcan/events/archived_events_folder/httpswww.myarkansaspbs.orgarcaneventsarchived_events_foldermedical_marijuana_commission-158526
55. Economic Impact Assessment prepared by Boyette Strategic Advisors estimating that the proposed New Day Cultivation facility in Garland County (near Hot Springs – cultivator applicant currently tied for 7th place) would create \$80M in positive economic impact in its first four years of operation
56. Arkansas map showing the five existing cultivators clustered in the Northeast half of the state, while the two remaining applicants would bring cultivation facilities to the Southwest half of the state

Subject: Arkansas Medical Cannabis Pricing is Significantly Higher than Other Medical Cannabis States

60. “Medical marijuana patients prefer Oklahoma over Arkansas” Times Record by Ty Thompson, April 23, 2020
 - a. Compares Arkansas to Oklahoma medical cannabis pricing
61. Pricing update from Green Springs Medical dispensary in Hot Springs showing that the per gram cost of medical cannabis was increased by 30% due to cultivators raising their prices due to lack of availability

62. Per gram cost comparison showing the Fort Smith, AR dispensary's (Fort Cannabis) least expensive gram at \$14 while the least expensive gram at the Roland, OK dispensary (Kush Closet) is \$5
 - a. Pricing as of June 5, 2020
 - b. Pricing from leafly.com
63. "Medical marijuana sales approach \$100 million in Arkansas" 5 News Online, June 14, 2020
 - a. Provides documentation that the average ounce of medical cannabis in Arkansas costs patients \$390.83
64. "Average price per ounce of high quality marijuana as of October 2019, by select U.S. state" Statista by Matej Mikulic, October 15, 2019
 - a. Documents that Arkansas per ounce pricing would be the second highest in the country (at \$391 per ounce) behind only Washington DC
65. Letter from River Valley Relief to the MMC showing example of \$100 per ounce medical cannabis pricing in Oklahoma

Rooter All Type Plumbing Co. v. Holliman, 50 Ark. App. 125, 900 S.W.2d 580 (1995).

The court rejected the contention that when an individual does not appear in the proceedings below, but seeks to appeal a final action under the Administrative Procedures Act, he must set out in his petition how the issuance of the permit will harm him; instead, in order to have standing, a petitioner must assert in his pleadings how he has already sustained or is immediately in danger of sustaining injury either in his person, business, or property as a consequence of the final action. *Ark. Alcoholic Bev. Control v. Muncrief*, 74 Ark. App. 221, 45 S.W.3d 438 (2001).

Cited: *Norton v. Blaylock*, 409 F.2d 772 (8th Cir. 1969); *Floyd v. Arkansas State Bd. of Pharmacy*, 248 Ark. 459, 451 S.W.2d 874 (1970); *Arkansas State Bd. of Pharmacy v. Whayne*, 248 Ark. 934, 454 S.W.2d 667 (1970); *Arkansas State Racing Comm'n v. Saylor*, 249 Ark. 913, 462 S.W.2d 472 (1971); *Arkansas Sav. & Loan Ass'n Bd. v. Corning Sav. & Loan Ass'n*, 252 Ark. 264, 478 S.W.2d 431 (1972); *Norton v. Blaylock*, 285 F. Supp. 659 (W.D. Ark. 1973); *Hickman v. Arkansas Bd. of Pardons & Paroles*, 361 F. Supp. 864 (E.D. Ark. 1973); *Jarvis v. ABC Bd.*, 253 Ark. 728, 488 S.W.2d 712 (1973); *Arkansas Racing Comm'n v. Emprise Corp.*, 254 Ark. 975, 497 S.W.2d 34 (1973); *Thomas v. Committee "A" Ark. State Plant Bd.*, 255 Ark. 517, 501 S.W.2d 248 (1973); *Selig v. Novak*, 256 Ark. 278, 506 S.W.2d 825 (1974); *Hewitt v. Gage*, 257 Ark. 579, 519 S.W.2d 749 (1975); *Jones v. Reed*, 267 Ark. 237, 590 S.W.2d 6 (1979); *Citizens Bank v. Arkansas State Banking Bd.*, 271 Ark. 703, 610 S.W.2d 257 (1981); *Snyder v. ABC Bd.*, 1 Ark. App. 92, 613 S.W.2d 126 (1981); *Copeland v. ABC Bd.*, 4 Ark. App. 143, 628 S.W.2d 588 (1982); *Rowell v. Austin*, 276 Ark. 445, 637 S.W.2d 531 (1982); *Johnson v. Arkansas ABC Bd.*, 6 Ark. App. 366, 642 S.W.2d 335 (1982); *Fayetteville Sch. Dist. No. 1 v. ABC Bd.*, 279 Ark. 89, 648 S.W.2d 804 (1983); *Arkansas Dep't of Human*

Servs. v. Donis, 280 Ark. 169, 655 S.W.2d 452 (1983); *ABC Div. v. Barnett*, 285 Ark. 189, 685 S.W.2d 511 (1985); *Livingston v. Arkansas State Medical Bd.*, 288 Ark. 1, 701 S.W.2d 361 (1986); *Patterson v. Hillcrest Home*, 299 Ark. 27, 770 S.W.2d 654 (1989); *Arkansas State Bd. of Cosmetology v. Roberts*, 28 Ark. App. 249, 772 S.W.2d 624 (1989); *Arkansas Dep't of Human Servs. v. Heath*, 307 Ark. 147, 817 S.W.2d 885 (1991); *Edwards v. ABC Div.*, 307 Ark. 245, 819 S.W.2d 271 (1991); *Hollabaugh v. Arkansas State Medical Bd.*, 43 Ark. App. 83, 861 S.W.2d 317 (1993); *Arkansas Dep't of Human Servs. v. Walters*, 315 Ark. 204, 866 S.W.2d 823 (1993); *Volunteer Council v. Governmental Bonding Bd.*, 319 Ark. 716, 894 S.W.2d 580 (1995); *Thomas v. Arkansas Dep't of Human Servs.*, 319 Ark. 782, 894 S.W.2d 584 (1995); *Bohannon v. Arkansas State Bd. of Nursing*, 320 Ark. 169, 895 S.W.2d 923 (1995); *Regional Care Facilities, Inc. v. Rose Care, Inc.*, 322 Ark. 767, 912 S.W.2d 409 (1995); *Douglass v. Nationwide Mut. Ins. Co.*, 323 Ark. 105, 913 S.W.2d 277 (1996); *Arkansas Appraiser Licensing & Certification Bd. v. Fletcher*, 326 Ark. 628, 933 S.W.2d 789 (1996); *Mid-South Rd. Bldrs., Inc. v. Arkansas Contractors Licensing Bd.*, 328 Ark. 630, 946 S.W.2d 649 (1997); *Social Work Licensing Bd. v. Moncebaiz*, 332 Ark. 67, 962 S.W.2d 797 (1998); *Arkansas Bd. of Exm'rs. v. Carlson*, 334 Ark. 614, 976 S.W.2d 934 (1998); *Arkansas Bd. of Registration for Professional Geologists v. Ackley*, 64 Ark. App. 325, 984 S.W.2d 67 (1998); *Brown v. Arkansas State Heating, Ventilation, Air Conditioning & Refrigeration Licensing Bd.*, 336 Ark. 34, 984 S.W.2d 402 (1999); *McQuay v. Arkansas State Bd. of Architects*, 337 Ark. 339, 989 S.W.2d 499 (1999); *Ford v. Keith*, 338 Ark. 487, 996 S.W.2d 20 (1999); *Arkansas Contractors Licensing Bd. v. Pegasus Renovation Co.*, 347 Ark. 320, — S.W.3d —, 2001 Ark. LEXIS 700 (2001).

25-15-213. Hearings generally.

In every case of adjudication, and in cases of rule making in which rules are required by law to be made on the record after opportunity for an agency hearing, and in cases of rule making in which, pursuant to § 25-15-204(a)(2), the agency shall direct that oral testimony be taken or a hearing held:

(1) Any person compelled to appear before any agency or representative thereof shall have the right to be accompanied and advised by counsel. Every party shall have the right to appear in person or by counsel;

(2)(A) There shall preside at the hearing:

- (i) The agency;
- (ii) One (1) or more members of the agency; or
- (iii) One (1) or more examiners or referees designated by the agency.

(B) All presiding officers and all officers participating in decisions shall conduct themselves in an impartial manner and may at any time withdraw if they deem themselves disqualified.

(C) Any party may file an affidavit of personal bias or disqualification. The affidavit shall be ruled on by the agency and granted if timely, sufficient, and filed in good faith;

(3)(A) Presiding officers shall have power, pursuant to published procedural rules of the agency:

- (i) To issue subpoenas if the agency is authorized by law to issue them;
- (ii) To administer oaths and affirmations;
- (iii) To maintain order;
- (iv) To rule upon all questions arising during the course of a hearing or proceeding;
- (v) To permit discovery by deposition or otherwise;
- (vi) To hold conferences for the settlement or simplification of issues;
- (vii) To make or recommend decisions; and
- (viii) Generally to regulate and guide the course of the pending proceeding.

(B) In any proceeding before any agency, if any person refuses to respond to a subpoena, refuses to take the oath or affirmation as a witness or thereafter refuses to be examined, or refuses to obey any lawful order of an agency contained in its decision rendered after hearing, the agency or the presiding officer of the agency hearing may apply to the circuit court of the county where the proceedings were held or are being held or to the circuit court of the county where a petition for judicial review was filed for an order directing that person to take the requisite action or to otherwise comply with the order of the agency. The court shall issue the order in its discretion. Should any person willfully fail to comply with an order so issued, the court shall punish him or her as for contempt;

(4) Except as otherwise provided by law, the proponent of a rule or order shall have the burden of proof. Irrelevant, immaterial, and unduly repetitious evidence shall be excluded. Any other oral or documentary evidence, not privileged, may be received if it is of a type commonly relied upon by reasonably prudent people in the conduct of their affairs. Objections to evidentiary offers may be made and shall be noted of record. When a hearing will be expedited and the interests of

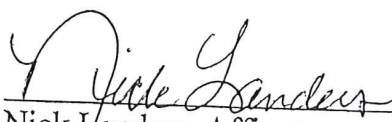
which reflects Travis Story as attorney of record for Trulove Dirt Works, LLC d/b/a Trulove Construction, a business owned by Jay and Mary Trulove. Exhibit 3, attached hereto and incorporated herein, is a copy of an order signed and entered by Pulaski County Circuit Judge Wendell Griffin in the case of Naturalis Health, LLC v. Arkansas Medical Marijuana Commission et al., case number 60CV-18-1559. The Court found in highlighted language on page 5 that Story's representation of the Truloves and then participating in the scoring of their cultivation application "violated the appearance of bias legal standard for administrative decision making...and was a departure from the fundamental fairness required to satisfy due process of law."

8. To the best of my knowledge and belief, Commissioner Story continues to represent Mr. and Mrs. Trulove as their personal attorney in regard to their many business interests to this day.
9. Commissioner Story, in his capacity as a member of the medical marijuana commission, has promoted a narrative through his own comments and questions he has posed to holders of dispensary licenses who have appeared before the Commission, that the three licensed cultivators who are currently selling product are producing a sufficient amount of medical marijuana products currently needed by the dispensaries and their patients. Such comments and questions on the part of Commissioner Story, many posed to operators of dispensaries, owned by or affiliated with the currently licensed cultivators, appear to be designed to convince his fellow commissioners that there is no need to approve our application, or the other two applications now under consideration.
10. Commissioner Story's prior legal representation of Mr. and Mrs. Trulove, who would be major beneficiaries of a decision by the Commission to deny the 3 cultivation applications under consideration for expansion, presents an obvious conflict of interest on the part of Commissioner Story.
11. Commissioner Story's prior legal representation of Mr. and Mrs. Trulove and his continued representation of the various Trulove business interests establish a conflict of interest on his part. His past efforts during several commission hearings to control the cultivation expansion narrative by discouraging expansion and attempting to make a public record in support of his position reflects a clear personal bias on his part against approving our company's application, as well as the applications of the other two reserve applicants currently under consideration.

12. Our company requests that Commissioner Story be disqualified from further discussions, deliberations and voting on the issue of possible approval of our application, as well as the other two reserve cultivation applications currently under consideration, because of his obvious conflict of interest in this matter as well as his clear personal bias against our company.

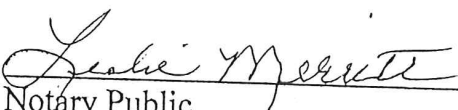
13. I have read the above and foregoing statements and each is true and correct to the best of my knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand this 13 day of June, 2020.



Nick Landers, Affiant

Subscribed and sworn to before me this 13 day of June, 2020



Notary Public

My Commission Expires:

9-20-2027





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LLC Member information is now confidential per Act 865 of 2007

Use your browser's back button to return to the Search Results

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For service of process contact the [Secretary of State's office](#).

Corporation Name	TRULOVE FARMS, LLC
Fictitious Names	
Filing #	811115127
Filing Type	Limited Liability Company
Filed under Act	Domestic LLC; 1003 of 1993
Status	Good Standing
Principal Address	1812 HIGHWAY 62 W BERRYVILLE, AR 72616
Reg. Agent	JAY TRULOVE
Agent Address	976 CLARK ROAD BERRYVILLE, AR 72616
Date Filed	10/12/2016
Officers	TRAVIS STORY ESQ, Incorporator/Organizer
Foreign Name	N/A
Foreign Address	
State of Origin	N/A
Purchase a Certificate of Good Standing for this Entity	Pay Franchise Tax for this corporation

Exhibit #1



Search Incorporations, Cooperatives, Banks and Insurance Companies

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Corporation Name	TRULOVE PROPERTIES, LLC
Fictitious Names	
Filing #	811095104
Filing Type	Limited Liability Company
Filed under Act	Domestic LLC; 1003 of 1993
Status	Good Standing
Principal Address	1812 HWY 82 W BERRYVILLE, AR 72616
Reg. Agent	MATT TRULOVE
Agent Address	1602 CR 711 BERRYVILLE, AR 72616
Date Filed	02/01/2016
Officers	MATT TRULOVE , Manager TRAVIS W STORY ESQ, Incorporator/Organizer
Foreign Name	N/A
Foreign Address	
State of Origin	N/A

[Purchase a Certificate of Good Standing for this Entity](#)

[Pay Franchise Tax for this corporation](#)



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Corporation Name	OSAGE PARTNERS, LLC
Fictitious Names	
Filing #	100187499
Filing Type	Limited Liability Company
Filed under Act	Domestic LLC; 1003 of 1993
Status	Revoked
Principal Address	
Reg. Agent	TRAVIS W. STORY
Agent Address	438 E. MILSAP ROAD FAYETTEVILLE, AR 72703
Date Filed	07/13/2000
Officers	SCHWYHART HOLDING, LLC, Manager SEE FILE, Incorporator/Organizer IRIS MARTIN , Tax Preparer
Foreign Name	N/A
Foreign Address	
State of Origin	N/A

[Pay Franchise Tax for this corporation](#)

Doc #2

Travis W. Story, Esq.
Bob Ballinger, Esq.
Katie L. Freeman, Esq.

STORY LAW FIRM, PLLC.

www.storylawfirm.com

January 28, 2016

Phone: 479.443.3700
Fax: 479.443.3701
Senders Email: Bob@storylawfirm.com

Brenda DeShields
Benton County Circuit Clerk
102 NE A Street
Bentonville, AR 72712

RE: Answer to Notice of Appeal and Complaint

Dear Sir or Madam:

Please find enclosed a copy of an Answer to Notice of Appeal and Complaint that I had faxed in on January 27th to be filed. The fax did not come out clearly, so I have enclosed a hard copy for your files.

Thank you for your assistance in this matter, and let me know if you have any questions.

Sincerely,

Kristin Cauthen

Kristin L Cauthen
Paralegal

/enclosures:

Answer to Notice of Appeal and Complaint

FILED
2016 FEB 1 PM 10 06
BRENDA DESHIELDS
CLERK AND RECORDER
BENTON COUNTY, AR.

IN THE CIRCUIT COURT OF BENTON COUNTY ARKANSAS

LARRY BRANTLEY AND RHONDA BRANTLEY

PLAINTIFFS

V.

CASE NO. CV-2016-17-4

BENTON COUNTY:
TRULOVE DIRT WORKS, LLC
D/B/A TRULOVE CONSTRUCTION;
JAY TRULOVE; AND MARY TRULOVE

DEFENDANTS

FILED
2016 FEB 1 PM 10:06
BRENDA DESHIELDS
CLERK AND RECORDER
BENTON COUNTY, AR.

ANSWER TO NOTICE OF APPEAL and COMPLAINT

COMES NOW, the separate Defendants, Trulove Dirt Works, LLC, Jay Trulove; and Mary Trulove ("Defendants") by and through their attorneys, Story Law Firm, PLLC, and for their Answer to the Plaintiff's Notice of Appeal and Complaint states the following:

1. Defendants neither admits nor denies the allegations of Paragraph One (1).
2. Defendants admit the allegations of Paragraph Two (2).
3. Defendants admit the allegations of Paragraph Three (3).
4. Defendants admit the allegations of Paragraph Four (4).
5. Defendants admit the allegations of Paragraph Five (5).
6. Defendants admit that they submitted a site plan to Benton County Planning Board for their review and deny all other allegations of Paragraph Six (6).
7. Defendants admit the allegations of Paragraph Seven (7).
8. Defendants admit the allegations of Paragraph Eight (8).
9. Defendants admit the allegations of Paragraph Nine (9).
10. Defendants admit the allegations of Paragraph Ten (10).
11. Defendants admit the allegations of Paragraph Eleven (11).
12. Defendants admit the allegations of Paragraph Twelve (12).

Exhibit #2

13. Paragraph Thirteen (13) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

14. Paragraph Fourteen (14) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

15. Paragraph Fifteen (15) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

16. Defendants deny the allegations of Paragraph Sixteen (16).

17. Paragraph Seventeen (17) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

18. Defendants deny the allegations of Paragraph Eighteen (18).

19. Paragraph Nineteen (19) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

20. Paragraph Twenty (20) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

21. Paragraph Twenty-one (21) of Plaintiff's Complaint does not require a response from the Defendant, to the extent one is required, it is denied.

22. Defendants deny the allegations of Paragraph Twenty-two (22).

DEFENSES

23. Defendants hereby asserts or otherwise reserves its objections to this action on the basis of failure to properly state a claim, failure to state facts upon which relief can be granted, and failure to join a party under Rule 19 of the Arkansas Rules of Civil Procedure.

24. Pleading affirmatively, the Defendants asserts the affirmative defenses of unclean hands, estoppel, and waiver.


25. The Defendants reserve the right to allege other affirmative defenses as they may arise during the course of discovery.

25. Defendants reserves the right to plead further, by amendment, third-party practice, or otherwise, pending further investigation and discovery

WHEREFORE, premises considered, the separate Defendants pray the Complaint of the Plaintiffs be held for naught and dismissed with prejudice, and for the Defendants' attorney fees, costs and all other relief to which they may prove themselves entitled, whether specifically prayed for herein or hereinafter.

Respectfully Submitted,
Trulove Dirt Works, LLC, Jay
Trulove; and Mary Trulove,
Defendants

By:


Robert A. Ballinger AR Bar# 2005087
Travis W. Story AR Bar # 2008274
Katie L. Freeman AR Bar # 2014199
Story Law Firm, PLLC.
438 E. Millsap Rd. Suite 103
Fayetteville, AR 72703
(479) 443-3700
(479) 443-3701 (fax)

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60CV-18-1559
C06D05 : 28 Pages

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
FIFTH DIVISION

NATURALIS HEALTH, LLC

PLAINTIFF

V

60CV-18-1559

ARKANSAS DEPARTMENT OF FINANCE
AND ADMINISTRATION;
ARKANSAS ALCOHOLIC BEVERAGE
CONTROL DIVISION;
ARKANSAS MEDICAL MARIJUANA COMMISSION

DEFENDANTS

MEMORANDUM ORDER ENTERING PRELIMINARY INJUNCTION
AND DECLARATORY JUDGMENT

Naturalis Health, LLC (hereafter "Plaintiff" or "Naturalis Health") filed a Verified Complaint in this matter on March 13, 2018 against the Arkansas Department of Finance and Administration (hereafter "ADFA"), Arkansas Alcoholic Beverage Control Division (hereafter "ABCD"), and Arkansas Medical Marijuana Commission (hereafter "MMC" or "the Commission") seeking a temporary restraining order, preliminary injunction, and declaratory judgment against the defendants concerning issuance of cultivation facility licenses authorized by the Arkansas Medical Marijuana Amendment of 2016. The Court entered a Temporary Restraining Order on March 14, 2018 after finding that the verified complaint contained factual allegations that the defendants have acted and were prepared to undertake imminent actions in violation of the Medical Marijuana Amendment, due process, equal protection, and their obligation to avoid arbitrary and capricious action in violation of the Arkansas Administrative Procedure Act (Ark. Code Annotated § 25-15-201 et seq.).

A hearing on Plaintiff's motion for a preliminary injunction was held on March 16, 2018. George "Jay" Bequette, Jr. and Keith Billingsley appeared as counsel for Plaintiff. Jennifer Merrit, Monty Baugh, and Brittany Edwards appeared as counsel for Defendants. At that

Exhibit #3

hearing, the Court heard from three (3) witnesses (Patrick Murphy, Mary Robin Casteel, and Joel DiPippa) and received eleven (11) documentary exhibits (Plaintiff's Exhibits 1, 2, and 3 and Defendants' Exhibits 1 thru 8) as evidence. Based on the testimony, documentary exhibits, and arguments of counsel, the Court makes the following findings of fact and conclusions of law.

Findings of Fact and Conclusions of Law

1. Amendment 98 to the Constitution of Arkansas was adopted by voters on Issue 6 initiated by the people on November 8, 2016 as The Arkansas Medical Marijuana Amendment of 2016.
2. Defendant Arkansas Medical Marijuana Commission was created within ADFA by § 19 of the Medical Marijuana Amendment "to determine the qualifications for receiving a license to operate ... a cultivation facility and the awarding of licenses (*see* AR Const. Amend. 98, §19(a)(1)). Pursuant to the §8(a)(1) of the MMA, cultivation facilities shall be licensed by the Medical Marijuana Commission.
3. The MMC is empowered to adopt rules governing how it considers applications for medical marijuana cultivation facilities (*see* MMA, §8(d)). Rules adopted by the MMC pursuant to the MMA "are rules as defined in the Arkansas Administrative Procedure Act (ACA §25-15-201 et seq.)."
4. Pursuant to the MMA, the Alcoholic Beverage Control Division (ABCD) shall provide staff for the MMC if the MMC does not have employees available for that purpose (*see* AR Const. Amend. 98, §19(e)(2)).
5. The MMA does not waive the sovereign immunity of the State of Arkansas. AR Const. Amend. 98, §3(f)(3)(G) reads: "This amendment does not waive the sovereign immunity of the State of Arkansas." Nevertheless, Plaintiff's lawsuit is not barred because it seeks

- injunctive relief based on allegations that Defendants engaged in and threaten impending action that is unconstitutional, ultra vires, arbitrary, and capricious.
6. Plaintiff is an unsuccessful applicant for a cultivation facility license. As such, Plaintiff has standing to sue Defendants.
 7. Plaintiff's lawsuit is ripe for adjudication. Defendants issued public statements identifying the putative successful applicants for a cultivation facility license. Defendants were scheduled to issue cultivation facility licenses to five applicants during a public meeting scheduled for March 14, 2018, at 5 p.m., and would have done so but for the March 14 temporary restraining order issued by this Court pursuant to Plaintiff's March 13 complaint.
 8. The MMA explicitly mandated the MMC to begin accepting applications for licenses to operate cultivation facilities. AR Const. Amend. 98, §8(g)(1). Section 8(g)(2)C(ii) of the MMA requires that the application include the physical address of the cultivation facility, "the location of which may not be within three thousand feet (3,000') of a public or private school, church, or daycare center existing before the date of the cultivation facility application, which shall be calculated from the primary entrance of the cultivation facility to the nearest property boundary of a public or private school, church, or daycare center."
 9. Defendant MMC promulgated rules and regulations governing the application for, issuance, and renewal of licenses for medical marijuana cultivation facilities in Arkansas (see Plaintiff's Exhibit 1 to March 16, 2018 hearing record, Exhibit 1 thereto). Those rules incorporate and re-state the constitutional requirement that the physical address of a medical marijuana cultivation facility may not be within 3,000 feet from the nearest

property line of a public or private school, church, or daycare center. Section IV(5)(c) of the MMC rules and regulations states: "Applicants shall provide proof that the proposed location of the cultivation facility is at least three thousand (3,000) feet from a public or private school, church, or daycare existing before the date of the cultivation facility application pursuant to the Arkansas Medical Marijuana Amendment of 2016. The distance specified in this section shall be measured from the primary entrance to the cultivation facility to the nearest property line point of the school, church, or daycare facility."

10. Defendants have failed to verify that the primary entrance for any of the 95 cultivation facility applicants is at least 3000 feet from a public or private school, church, or daycare that existed before the date of the cultivation facility applications, as required by the Arkansas Medical Marijuana Amendment.
11. The Medical Marijuana Commission has selected five applicants to receive cultivation facility licenses. They are: Natural State Medicinals Cultivation; Bold Team, LLC; Natural State Wellness Enterprises; Osage Creek Cultivation; and Delta Medical Cannabis Company. The Commission received the license fee (\$100,000) and performance bond (\$500,000) from each of the five selectees, intended to confer licenses and registration numbers to each selectee during a public meeting scheduled for March 14, 2018, at 5 p.m., and has not done so only because that meeting was postponed after this Court issued a temporary restraining order, on Plaintiff's motion, on March 14.
12. Commissioner Travis Story of the MMC has served as attorney for and an officer in business entities owned or operated by Jay and Mary Trulove, two persons with ownership interests in Osage Creek Cultivation. Osage Creek Cultivation is one of the

applicants designated by the MMC to be issued a medical marijuana cultivation facility license. Commissioner Carlos Roman, M.D., is a physician who routinely refers patients to Dr. Scott Schlesinger, one of the persons holding an ownership interest in Natural State Medicinals Cultivation (hereafter "NSMC"). *See* Plaintiff's Exhibit 1.

13. Commissioners Story and Roman of the MMC actively participated in the process for evaluating, scoring, ranking, and selecting applicants to receive licenses to operate medical marijuana cultivation facilities pursuant to the MMA and rules of the MMC.
14. The participation by Commissioners Story and Roman in the cultivation facility license application evaluation, scoring, ranking, and selection decision-making process violated the "appearance of bias" legal standard for administrative decision-making. As such, the cultivation facility scoring, ranking, and licensing process in which they participated was a departure from the fundamental fairness required to satisfy due process of law.
15. Defendants have violated the Arkansas Medical Marijuana Amendment of 2016 and the rules of the Medical Marijuana Commission in performing the application evaluation and decision-making process for awarding medical marijuana cultivation facility licenses. Defendants have not violated provisions of the Arkansas Administrative Procedures Act concerning meeting notices and opportunities for interested parties to be heard. The decision-making and selection process of the Medical Marijuana Commission for conferring licenses to operate medical marijuana cultivation facilities has been compromised by the participation of Commissioners Story and Roman, in violation of the "appearance of bias" standard that applies to administrative decision-making and due process of law.

I WOULD LIKE TO DISCUSS PRODUCT AVAILABILITY FROM CULTIVATORS

AS THIS PROGRAM BEGAN, STATISTICS WERE USED FROM WESTERN MEDICAL MARIJUANA STATES THAT TAUGHTED A 1% PATIENT PARTICIPATION RATE TO BE EXPECTED WITH THE ARKANSAS MEDICAL MARIJUANA PROGRAM.

IN MY DISPENSARY BUSINESS PLAN I NOTED THAT A VERTICAL LINE FROM OKLAHOMA EASTWARD HAD 3 TIMES THE OPIOID PRESCRIPTIONS OF WESTERN STATES AND THAT I ANTICIPATED A PATIENT PARTICIPATION RATE CLOSER TO 2% AND LIKELY 3%.

THE AMENDMENT APPROVED 5 CULTIVATORS WITH 2 POTENTIALLY ADDITIONAL CULTIVATORS ALLOWED IF THE NEED AROSE.

HERE WE ARE A YEAR LATER, 30,000 PATIENTS WOULD HAVE BEEN THE 1% PARTICIPATION RATE, WE ARE AT OVER 60,000 PLUS PATIENTS AND HAVE SURPASSED 1%, 2% AND ARE NOW KNOCKING ON THE DOOR TO 3% PATIENT PARTICIPATION AS I HAD PROJECTED.

WE ONLY HAVE 3 OF THE 5 LICENSED CULTIVATORS GROWING OF THE 5 LICENSED AND APPROVED AND WE NEED THOSE OTHER 2 ADDITIONAL CULTIVATORS TO BE APPROVED TO BE ABLE TO HANDLE THE PATIENT NEEDS AS SOON AS POSSIBLE.

IN A LETTER DATED SEPT 20, 2019 I SENT AN EMAIL TO THE ABC AND THE MEDICAL MARIJUANA COMMISSION STRESSING THAT THE SALE OF DISPENSARIES TO BOLD CULTIVATION HAD TO STOP.

THAT BOLD CULTIVATION WOULD MONOPOLIZE THE MARKET BY PRODUCT PRICING, QUALITY, AND AVAILABILITY. AND THAT INSIGHT CAME TO FRUITION A MONTH LATER WHEN BOLD STOPPED MAKING PRODUCT AVAILABLE FOR SALE TO GREEN SPRINGS IN ORDER FOR THEIR SUITE 443 AND OTHER BOLD OWNED DISPENSARIES TO GAIN MARKET FOOTHOLD.

I HAVE ASKED FOR PRODUCT NUMEROUS TIMES AND HAVE NOT BEEN ABLE TO PURCHASE ANY MEDICAL MARIJUANA PRODUCTS FROM BOLD CULTIVATION SINCE OCTOBER OF 2019. I ASKED ROBERT LERCHER AS RECENTLY AS 2 WEEKS AGO IN A TEXT MESSAGE TO PLEASE MAKE AVAILABLE A CURRENT PRODUCT LIST AND STILL HAVE NOT RECEIVED ANY LIST OR INTENT TO MAKE PRODUCT AVAILABLE TO GREEN SPRINGS WHICH IS A CLEAR MANIFEST TO MONOPOLIZATION.

GREEN SPRINGS IS THE LARGEST SELLER OF MEDICAL MARIJUANA IN THE STATE OF ARKANSAS. WE HAVE TAKEN PRIDE IN OUR POLICY OF TRANSPERENCY TO OUR PATIENTS, AND FOR THAT REASON WE SELL 12 TO 15 POUNDS OF MEDICAL MARIJUANA EVERY DAY, I PUBLICLY ANNOUNCED 3 TO 4 WEEKS AGO THAT ONE OF OUR MAIN CULTIVATORS WAS HAVING PROBLEMS SUPPLYING US AND HAD COMPLETELY STOPPED OUR VALUE PRICING LEVEL WHICH IN TURN MADE US ANNOUNCE THAT OUR VALUE STRAIN THAT WE HAVE BEEN SELLING FOR THE PAST 6 MONTHS AT COST FOR \$5 PER STRAIN WOULD ONLY BE AVAILABLE AT OUR NEW \$6.50 PRICE UNTIL PRODUCTION AND ON HAND INVENTORY BY CULTIVATORS INCREASED.

I HAVE NO CLUE WHAT IS GOING ON WITH THE 4TH AND 5TH CULTIVATORS BUT AT THIS JUNCTURE, THEIR ARRIVAL TO THE PRODUCT AVAILABLILITY ARENA WILL BE TOO LATE TO MAKE A DIFFERENCE IN THIS SUPER FAST MOVING PATIENT COUNT IN THE STATE OF ARKANSAS.

THE CULTIVATORS WILL TELL YOU THAT THEY HAVE PLENTY OF PRODUCT AND THERE IS NO NEED FOR MORE CULTIVATORS, BUT THAT IS SIMPLY SELF PRESERVATION HYPE. I IMPLORE THE MEDICAL MARIJUANA COMMISSOIN TO ALLOW THE 6TH AND 7TH CULTIVATORS THEIR CULTIVATORS LICENSES AS SOON AS POSSIBLE TO BE ABLE TO KEEP THE ARKANSAS MEDICAL MARIJUANA PROGRAM MOVING IN THE RIGHT DIRECTION WITH AMPLE MEDICAL MARIJUANA INVENTORIES AND PRICING THAT IS EQUALLY BENEFICIAL TO PATIENTS BY THE ADDED COMPETITION.

June 1st, 2020

Arkansas Medical Marijuana Commission
1515 W 7th Street
#503
Little Rock, AR 72201

Commissioners,

We collectively represent 33% [to be corrected based on actual signature count] of the operating dispensaries in the State of Arkansas.

Our goal with this letter is to give you a clear picture of how supply and demand is working currently for medical cannabis patients in our state.

- 1) There is currently a lack of availability of medical cannabis among the cultivators, which is resulting in higher prices.
- 2) Since the inception of the program, our wholesale prices from the cultivators and consequently the retail pricing that we charge to patients is already very high, especially compared to other medical cannabis states like our neighbor, Oklahoma. These high prices are a substantial burden on medical cannabis patients who can least afford it, and many are resorting to the lower prices of the black market or neighboring states.
- 3) Patient counts are currently above 56,000. This is well above the threshold of 30,000 patients originally projected by the State and at which the Commission agreed to reevaluate the need to issue the remaining licenses.
- 4) We know that increased competition will lead to lower pricing for patients, as it has in other states.

Therefore, we urge the Commission to release the constitutionally allowed number of licenses so that we can get as close to a free market as is possible under Amendment 98.

Respectfully,

DocuSigned by:

DE982DC7C21E4B1...
Ed Pat Wright

Hickory Hill Pharmacy

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Respectfully,

DocuSigned by:
Dragan Vicentic
6D1324564EBC489...

Dragan Vicentic

Green Springs Medical, LLC

Mr. Nolan,

I'm forwarding you this copy of an email I sent to Director Chandler at ABC a few moments ago. I hope it assists you and the other potential licensees.

Warmest regards

Begin forwarded message:

From: Michael Wilkins <michaelwilkins@me.com>
Subject: Issuing Additional Medical Marijuana Licenses
Date: June 16, 2020 at 8:24:10 AM CDT
To: Doralee.Chandler@dfa.arkansas.gov

Dear Director Chandler,

I'm sending this email to support the immediate issuance of the three remaining medical marijuana cultivation and all remaining dispensary licenses allowed in the Rules.

I've been involved in the legal medical marijuana industry for some time as a businessman, investor and licensee. I believe Arkansas' medical marijuana industry growth and development has been hindered by a lack of diverse high quality products, particularly in the fast growing non-smokable products market segment.

Competition is necessary for the expectations of voters who approved the Constitutional Amendment to be met. It will spur the investment, development and manufacture of medical marijuana products Arkansas consumers want. It will increase the collection of taxes to support the proper regulation of the program and for the State to benefit. There are currently in excess of 50,000 medical marijuana card holders in Arkansas, and it's past time for retail prices to begin working their way down to a range similar to other states.

Arkansans want access to more diverse, affordable medical marijuana products to address their needs. Making sure an assortment of products are available to all Arkansans at affordable prices should be a concern of the Arkansas Medical Marijuana Commission at all times. It's an issue of basic fairness.

I believe issuing all the remaining medical marijuana licenses allowed under the Act is in the best interests of all Arkansans.

Respectfully submitted,

Michael Wilkins

Pine Bluff Agriceuticals
805 Wood Duck Lane
Russellville, AR 72801

From: Dragan Vicentic draganv@att.net 
Subject: Fw: lack of cultivators
Date: June 20, 2020 at 10:07 AM
To: snolan@cskhotels.com

Dragan

(501) 623-4784

This email correspondence relates to an attempt to collect a debt in a commercial credit transaction by a secured party within the full parameters of the Federal Fair Debt Collection Practices Act (FDCPA). It is in your best interest to respond to a debt collection request immediately.

"The contents of this message and any attachments are intended solely for the addressee(s) named in this message. This communication is intended to be and to remain Privileged/Confidential and may be subject to applicable creditor/debtor and/or work product privileges. If you are not the intended recipient (or responsible for delivery of the message to such person) of this message, or if this message has been addressed to you in error, please immediately alert the sender by email or contact the corporate office at (501)623-4784 and delete the email from any computer. You are notified that the dissemination, distribution, or copying of this message and/or any attachments is strictly prohibited, do not disclose the contents or take any action in reliance upon the information contained in this communication or any attachments."

----- Forwarded Message -----

From: Dragan Vicentic <draganv@att.net>
To: alan.clark@senate.ar.gov <alan.clark@senate.ar.gov>; bradley.phillips@me.com <bradley.phillips@me.com>
Sent: Saturday, June 20, 2020, 08:26:57 AM CDT
Subject: lack of cultivators

Good morning Alan,

I spoke to the ABC and Medical Marijuana Commission on Tues June 16 and explained the patient statistics behind allowing their initial 5 cultivators and where we are now. As the top dispensary in the state my comments are real time and genuine. The other dispensaries don't seem to want to rock the boat and explain that it is smooth sailing but you will see in the attachments that Red River Remedy dispensary and Natural Relief dispensary are already making social media posts explaining that there are product shortages and reducing how much product they can offer at the reduced rate.

I have also attached invoices from Natural State and Osage cultivators clearly indicating that the reduced rates on flower I was able to negotiate is no longer available and prices from Natural State increasing because of higher demand and less product. You will also find texts between myself and Natural State CEO Rob Lemberes indicating shortages and price increase.

attachment explanation...

a1...texts between Rob Lemberes and Dragan Vicentic starting 5/19 no flower and going up on prices
a2...texts between Rob Lemberes and Dragan Vicentic raised prices from \$1,600.00/ pound (lower tier) and \$ 2,250.00/pound (price for all other strains) to \$2,800.00/ pound
a3...texts between Rob Lemberes and Dragan Vicentic \$2,800 was reduced to \$2,600 after I contacted one of the Natural State owners to complain
a4...texts between Rob Lemberes and Dragan Vicentic 6/11, Rob stated lower tier strains "may" be available in a couple weeks. That is 6 weeks with no lower tier pricing because of lack of product
a5 and a6...invoice dated 5/11 natural state cultivators, showing per gram price \$3.52/gram or \$1,600.00/pound lower tier or discounted pricing, and \$4.96/gram or \$2,252.00/ pound pricing on all other strains.
a7 invoice dated 5/22 from natural state showing only \$4.96/g or \$2,250.00/pound pricing available

a8 and a9...invoice dated 6/4 from natural state showing increase in prices from \$1,600 and \$2,250 pricing to only premium \$2,600/pound pricing.

a10 ...invoice from osage cultivators showing \$4.95/ \$2,247.00/ pound (discounted tier) and \$5.72/ \$2,600/ pound tier pricing and availability of discounted tier.

a11....invoice from osage cultivators showing \$4.95/ \$2,247.00/ pound (discounted tier) and \$5.72/ \$2,600/ pound tier pricing and availability of discounted tier.

a12, 13, 14, 15...invoice from osage cultivators showing negotiated 10% discount on invoices with agreement of minimum \$100,000.00 order every week. \$2,025.00 (discounted) \$2,388.00 other strains.

a16...invoice from osage cultivators no availability of discounted flower only premium pricing.

a17...social media announcement by Red River Remedy Dispensary that limited economy tier coming to an end because of supply shortage.

a18 ... social media announcement by Natural relief dispensary that cultivators have taken away their ability to offer 7grams of lower tier pricing to only 3.5 grams.

a19...Dragan Vicentic script for june 16 medical marijuana commission meeting

Dragan

(501) 207-0420

This email correspondence relates to an attempt to collect a debt in a commercial credit transaction by a secured party within the full parameters of the Federal Fair Debt Collection Practices Act (FDCPA). It is in your best interest to respond to a debt collection request immediately.

"The contents of this message and any attachments are intended solely for the addressee(s) named in this message. This communication is intended to be and to remain Privileged/Confidential and may be subject to applicable creditor/debtor and/or work product privileges. If you are not the intended recipient (or responsible for delivery of the message to such person) of this message, or if this message has been addressed to you in error, please immediately alert the sender by email or contact the corporate office at (501)623-4784 and delete the email from any computer. You are notified that the dissemination, distribution, or copying of this message and/or any attachments is strictly prohibited, do not disclose the contents or take any action in reliance upon the information contained in this communication or any attachments."

4:42 [notification icons] [social media icons] [more options] [N] [L] [signal strength] [15% battery]

< Rob Lemberes Natural... +15018307555 [signal strength] [search] [more options]

Tuesday, May 19, 2020

10:13 AM

Hey what is eta on delivery?

R Good morning They have

< Rob Lemberes Natural... +15018307555 [call icon] [search icon] [menu icon]

Tuesday, May 19, 2020

10:13 AM Hey what is eta on delivery?

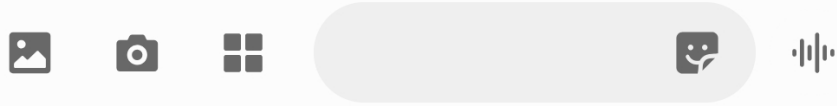
R Good morning. They have you on the board for your standard Friday. 10:15 AM

Yea but you pushed me from Friday to Monday last week

10:16 AM Now I'm going a whole week without

R Well I have a bigger problem. Right now I only have 20lbs and no Popcorn and no reduced price flower either. Today we are trying to pull together another 5lbs for you by Friday. I am out of flower and these girls are not growing fast enough, 10:37 AM

10:55 AM Okay friday it is the [dropdown arrow]



4:42 [notification icons] 14%

< Rob Lemberes Natural... +15018307555 [call icon] [search icon] [more icon]

R Hi Dragan. Did you see my email from this morning? Our company raised prices. They took any autonomy from me, and set the minimum at \$2,800lb. Will shoot you over what I sent out last week as far as products, 4:36 PM

4:51 PM Oh dude that's a catastrophe

R Agreed. I am sick about it. I honestly have been dreading this day. 4:53 PM

4:56 PM Man I'll be honest with you I will have to buy all my dry herb from Osage

R I do appreciate the honesty and I shared that with my ownership. I am really sorry, Dragan - This isn't how I wanted this to go down. 4:58 PM

[gallery icon] [camera icon] [app drawer icon] [text input field] [emoji icon] [voice recording icon]

[home indicator] [back arrow]

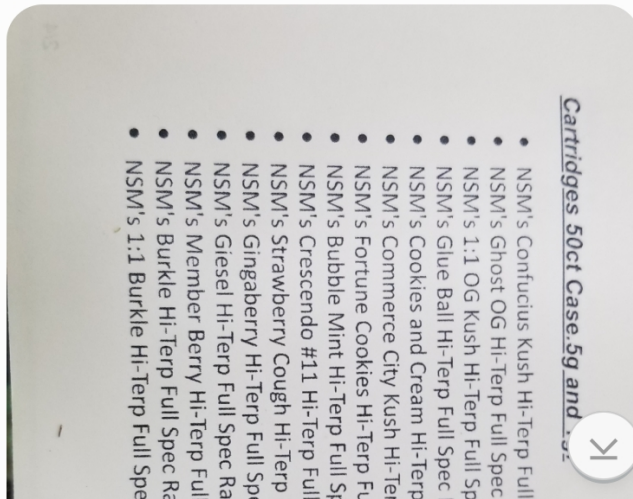
< Rob Lemberes Natural... +15018307555 [call icon] [search icon] [more icon]

Thursday, May 28, 2020

R Hi Dragan sending over the list for next week. We were able to get you a little lower than \$2,800 and got you to the \$2,600 per pound. 11:36 AM

11:37 AM Not going to work I am paying \$2,000/ pound at Osage

R Ok - Yeah, that is the best we can do, sorry. Thank you for the update and let us know if you need any ancillary items. 11:45 AM



4:44 [notification icons] 14%

< Rob Lemberes Natural... +15018307555 [call icon] [search icon] [menu icon]

Thursday, June 11, 2020

[R] Got it 6:56 AM

6:57 AM So when can I get some discounted flower again?

[R] We may have some popcorn in a few weeks 7:59 AM

Friday, June 12, 2020

9:20 AM Hey buddy what time is delivery today?

[R] Hi there. They are packaging it now they are trying to wave by 1 9:20 AM

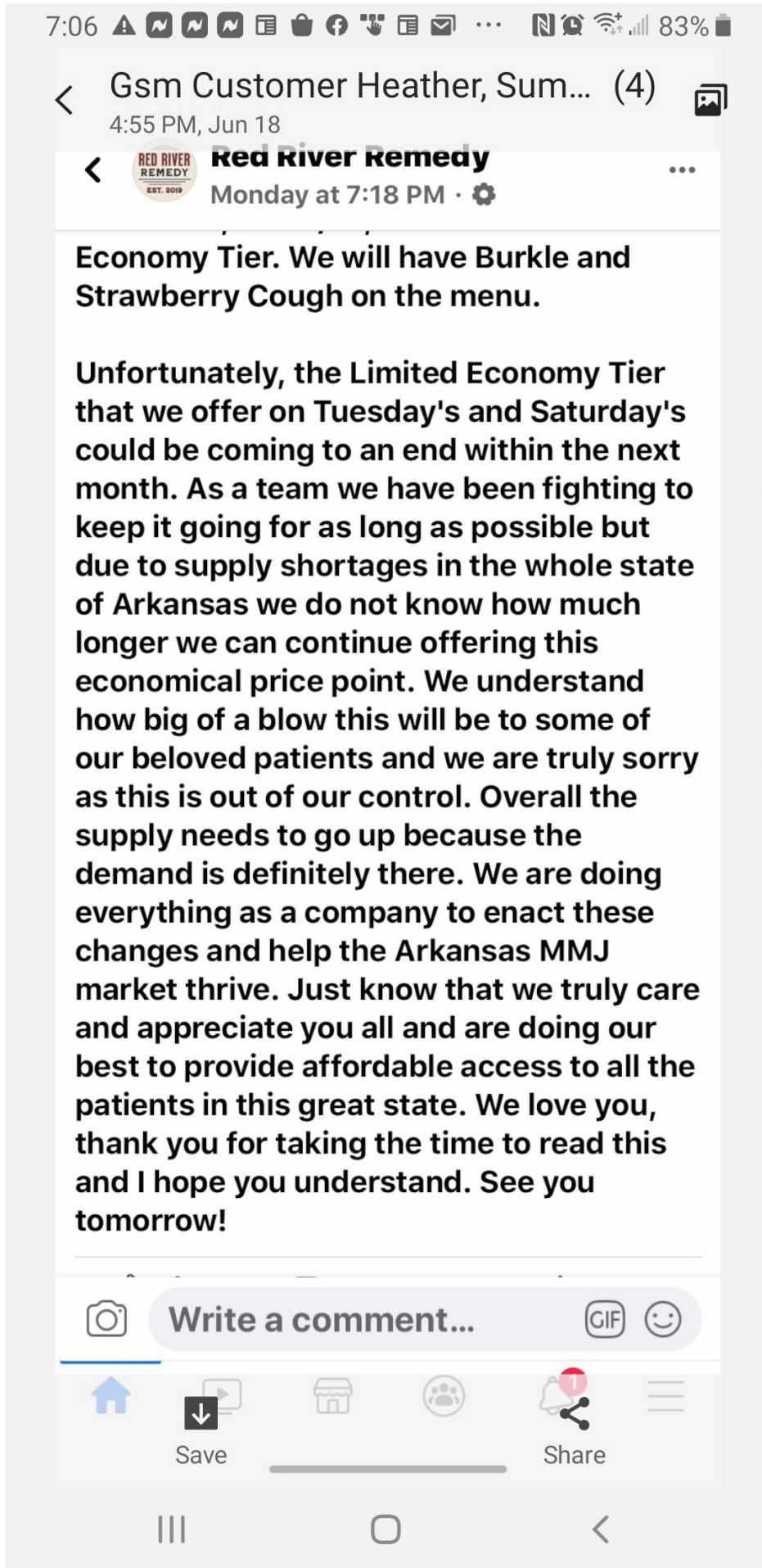
Awesome
9:27 AM Thanks Rob

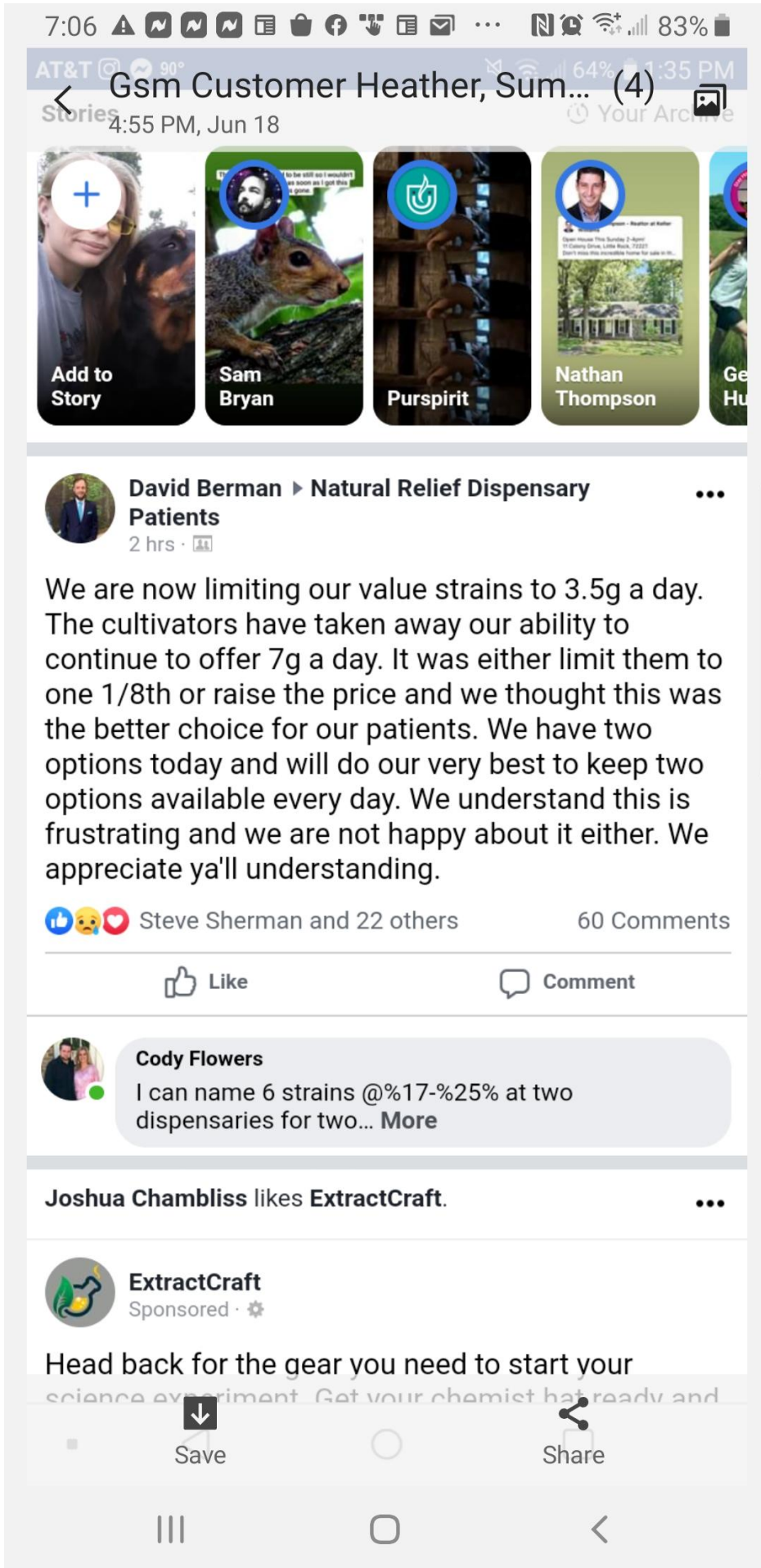
Wednesday, June 17, 2020

Hey buddy can I get an email [dropdown arrow]

[image icon] [camera icon] [app drawer icon] [text input field] [emoji icon] [voice recording icon]

[home indicator] [navigation bar icons]





From: Don Brewington don@greenremediesgroup.com
Subject: FW: Login information and discussion on Monday
Date: June 7, 2020 at 11:17 AM
To: Storm Nolan snolan@cskhotels.com

Hey Strom, here is some points Mleah made that will help you tomorrow. If you have time today I can talk with you and review what you can say in your short time with the MMC.

Thank you for getting on board.

Don

Sent from [Mail](#) for Windows 10

From: [Mleah W.](#)
Sent: Sunday, June 7, 2020 8:29 AM
To: [Don Brewington](#)
Subject: Login information and discussion on Monday

Good morning!

I need the login information for Shopify and Wheniwork. For shopify, I'll need the store name, it should be something like "myshop.myshopify.com." For wheniwork, it's an email as the username. I can shut down both as soon as I get those.

Also, thinking about what Storm should add if he hasn't finished it. Something about the safety of our patients who are still buying from the black market. When buying from the black market, it's not regulated or tested, putting our patients in danger!

I know you asked me to give very detailed points, but I'm unsure of the data as far as wait times and driving distances. I couldn't find anything when I searched either.

Patients in Alexander would say "I guess I'll have to drive to Hot Springs" because we wouldn't have \$5 grams! The lowest price option to buy from the cultivator, costs the dispensary \$5/gram, so that would just be a loss for the dispensary if they wanted to compete with that.

There are huge shortages by the cultivators. BOLD rarely had flower and the last week I was in Alexander, NSM had 6 strains and a limit of one pound each. A few consecutive weeks before, NSM had NO flower to choose from.

As far as selection, there are no edibles (besides tinctures) that aren't candy! To narrow it down further, there is only one edible that is sugar-free.

When purchasing from cultivators, it was first come first served (which was fair), but they cannot keep up with the demand. They send out their inventory lists for the week on Thursday mornings, and if you (the dispensary) don't respond quickly with your order, you probably won't get what you want.

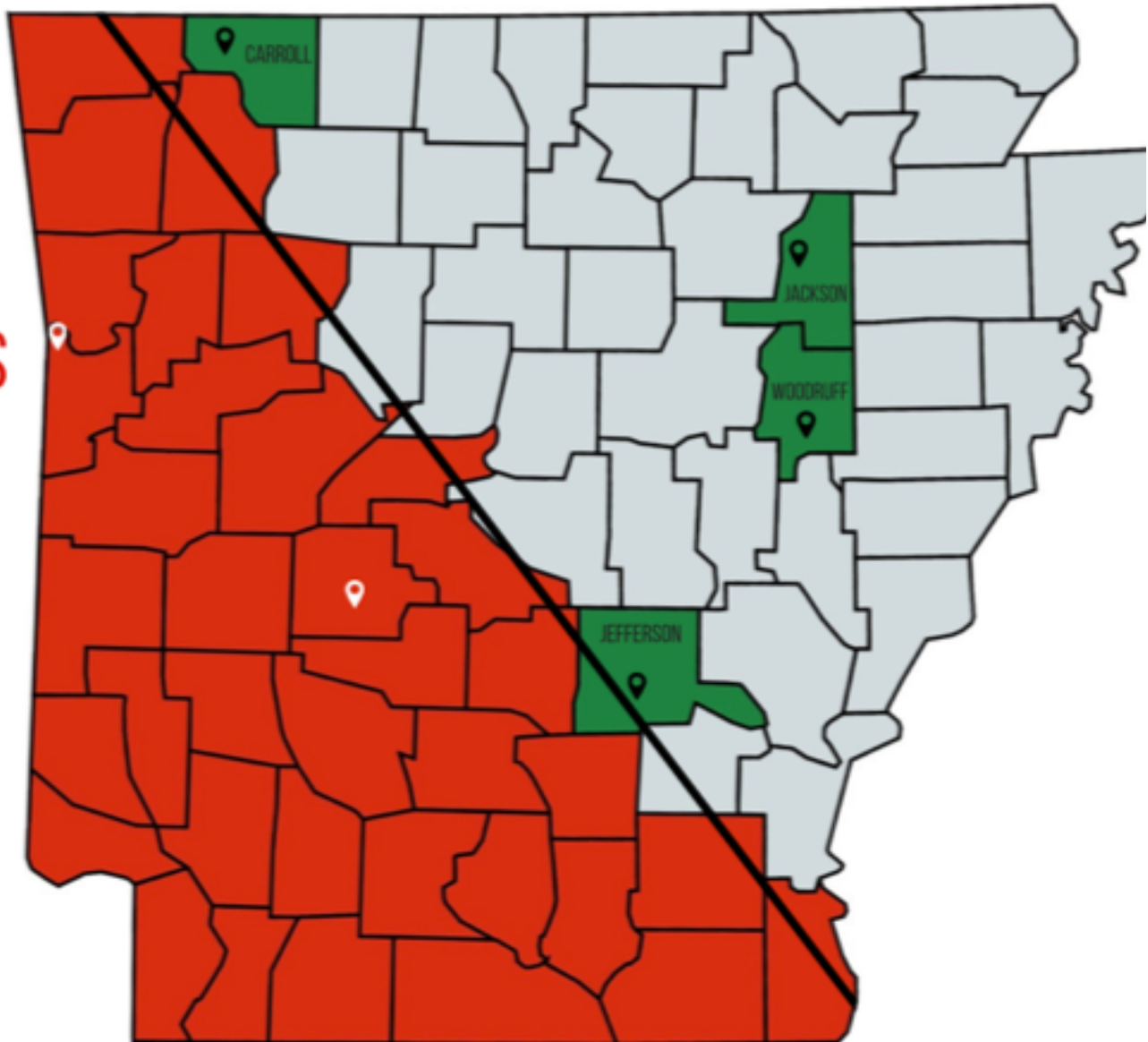
I don't belong to any Facebook groups for patients, but I'm sure you'd hear all the complaints there!

See ya tomorrow, I'll be in the flower beds all day 😊
Mleah

ARKANSAS MEDICAL MARIJUANA

SELECTED CULTIVATION CENTERS

1 IN 4
ARKANSANS
LIVE HERE





GSM Pricing Group



Dragana

Green Springs (GSM)

Hot Springs

5 / 29 / 2020

Due to all three cultivators raising prices because of lack of availability, we will have to temporarily discontinue the \$5/gram and \$7.50/gram and replace them with only one \$6.50 compassionate tier

\$6.50g

[] Black Russian (Osage)

70% Indica

- 1 g - \$6.50
- 2 g - \$13.00
- 3.5 g (1/8 oz) - \$22.75
- 7 g (1/4 oz) - \$45.50
- 28 g (1 oz) - \$223.00

\$9.99/g:

[] Sugar Black Rose-80% Indica

[] OG Kush-55% Sativa Hybrid

[] Confucius Kush-70% Indica

- 1 g - \$9.99
- 2 g - \$19.98
- 3.5 g (1/8 oz) - \$34.97
- 7 g (1/4 oz) - \$69.00
- 14 g (.5 oz) - \$139.00
- 28 g (1 oz) - \$249.00



Aa



Source: <https://www.statista.com/statistics/589688/medical-marijuana-prices-by-state/>

U.S. high quality marijuana prices per ounce in 2019 by state

Published by Matej Mikulic, Oct 15, 2019

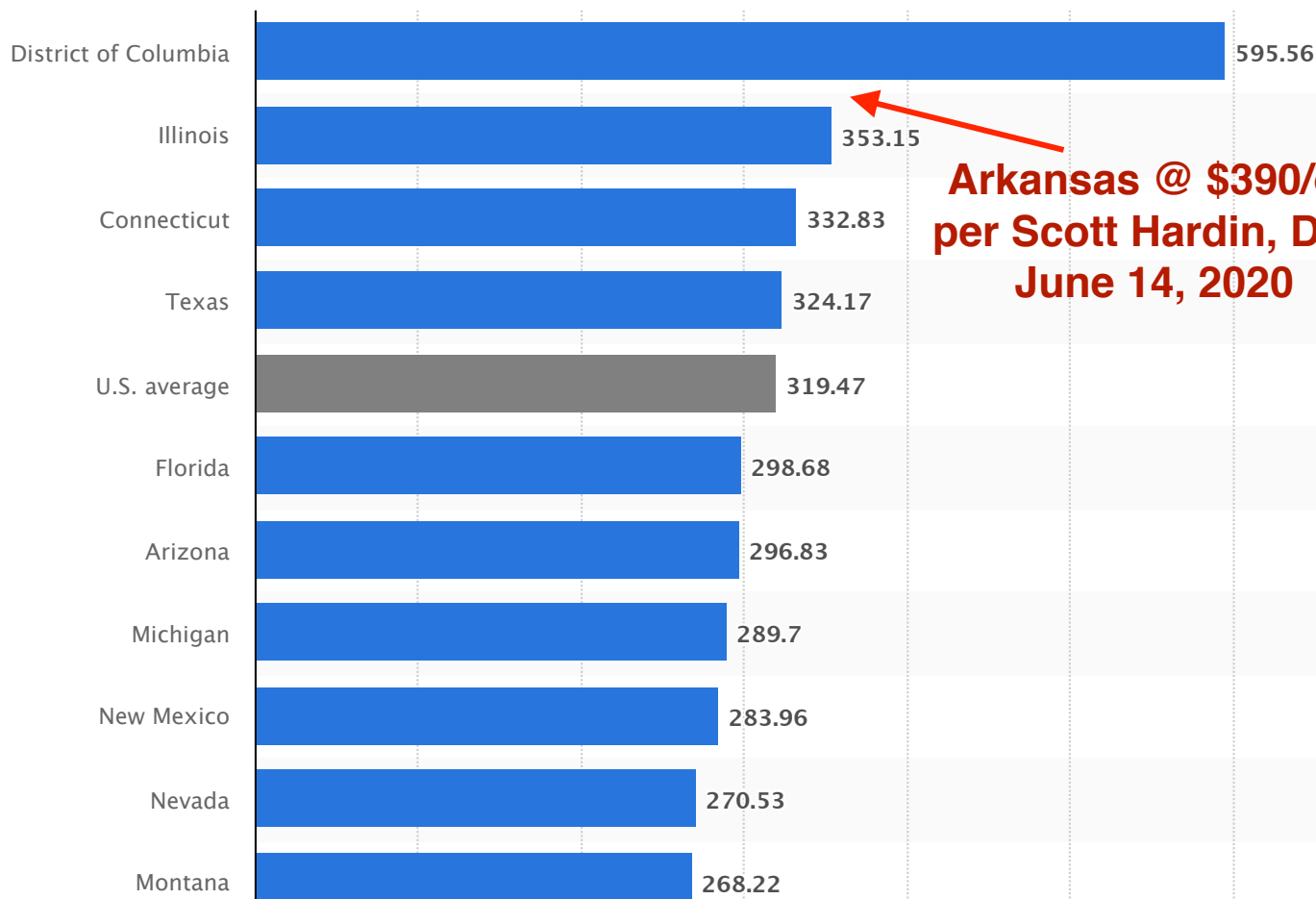
The District of Columbia holds the record for the highest price per ounce of high quality marijuana in the United States, as of October 2019, with an average price of some 596 U.S. dollars per ounce. According to recent data, by 2021, recreational marijuana sales in the U.S. are expected to triple.

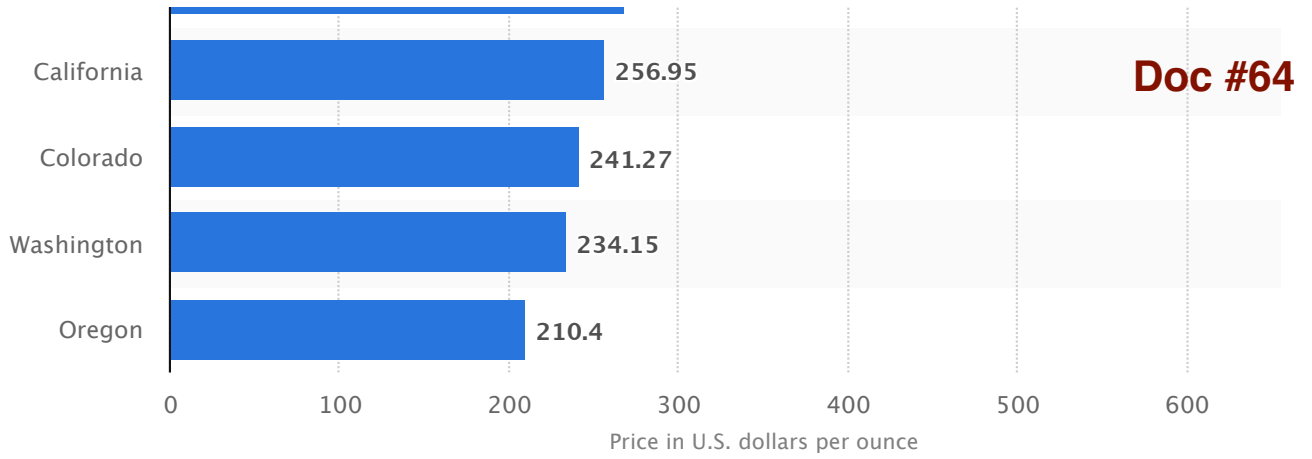
Recreational cannabis use

Recreational cannabis is not legal in all U.S. states; however, many consumers use the drug

Average price per ounce of high quality marijuana as of October 2019, by select U.S. state

(in U.S. dollars)





[Additional Information](#)

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Release date

October 2019

Region

United States

Survey time period

as of October 2019