

Mission:

To protect, promote and improve the health of all people in Florida through integrated state, county and community efforts.



Ron DeSantis
Governor

Scott A. Rivkees, MD
State Surgeon General

Vision: To be the Healthiest State in the Nation

Sent via Electronic Delivery

January 14, 2021

KSGNF, LLC
d/b/a GTI Florida, LLC
c/o Stacey Mahone
Stacey.Mahone@gtigrows.com

Re: Variance Request - GTI - Proposed Wholesale Purchases

Reference Number - 00003861

Dear Ms. Mahone,

The Florida Department of Health ("Department") received a variance request ("Variance"), from KSGNF, LLC, dba GTI Florida, LLC ("GTI") on December 22, 2020. In the Variance, GTI notified the Department of a harvest failure and intent to purchase wholesale product to recover the loss. The harvest failure was identified at the following address:

- Not provided

The Department requests the following information:

Crop Loss

- Provide a detailed description of the crop loss to include:
 - The number of plants lost;
 - The stage of growth at the time of loss;
 - A list of facilities affected, including the specific address and areas within the facility affected;
 - Documentation of the cause of crop loss, to include any photo evidence;
 - A detailed corrective action plan;
 - Any updated standard operation procedures, applicable to the harvest failure;
 - Seed-to-sale data notifying the Department of marijuana plants that were lost and due to the harvest failure and when they were disposed of in accordance with Emergency Rule 64ER20-16;
 - Documentation of fumigation or treatment of plants, or removal and destruction of infested or infected plants, in accordance with chapter 581 and any rules adopted thereunder, in compliance with section 381.986(8)(e)6.d., Florida Statutes.

Wholesale Purchase

- Provide documentation of the wholesale purchase to include:
 - Any fully executed contracts and agreements (such as security or testing) with pricing details included;
 - The product type being purchased (e.g. dry flower, oils, etc.);
 - Explanation of how the wholesale purchase will be structured;
 - Explanation of how the wholesale purchase will be labeled and packaged;
 - Explanation of how the medical marijuana treatment center will test products produced from wholesale purchase;
 - Explanation of how the wholesale purchase will be tracked in the seed-to-sale system;
 - Explanation of how the wholesaler ensures they can supply their patients after the transaction.

KSGNF, LLC
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Provide written responses to the above requests for additional information with all supporting documentation necessary within fourteen (14) days of the date of this correspondence. If any responses contain confidential information you must identify that at the time of submittal and provide a redacted version of the submission. If you have any questions, please contact the Department directly for assistance.

Sincerely,

Courtney Coppola
Courtney F. Coppola
Chief of Staff & Marijuana Coordinator
Florida Department of Health

cc: Jennifer Tschetter, jennifer@tschetterlawoffice.com