



Steven Stack, MD
Secretary

KENTUCKY OFFICE OF MEDICAL CANNABIS

Cabinet for Health and Family Services
500 Mero Street, 5 SC-14
Frankfort, Kentucky 40601

Cannon Armstrong
Executive Director

October 17, 2025

Sent via Electronic Mail

Shawwna Crouse
Deputy State Auditor
Auditor of Public Accounts
209 St. Clair Street
Frankfort, Kentucky 40601-1817

Re: *Preliminary Assessment of the Office of Medical Cannabis; Supplemental Response*

Dear Deputy Auditor Crouse:

On behalf of the Office of Medical Cannabis (OMC), this is a supplemental response the OMC's previous responses to the Preliminary Assessment letter sent by your office on April 17, 2025.

Our office reserves the right to object to charges from the Auditor given the process has been fully transparent and established by the General Assembly in statute and approved by regulation. Finally, we have yet to receive any substantive information from the Auditor that there is a legitimate legal basis to conduct a "preliminary assessment" of OMC. The Auditor has also failed to identify a single complaint or complainant, or describe the nature of any such complaint. Regardless, we will continue to uphold our commitment to full transparency with this program and continue to be proud of the work we are doing to bring much-needed relief to Kentucky patients who qualify for a medical cannabis card.

In its most recent document production on May 30, 2025, OMC provided the final versions of the 5,002 medical cannabis business license applications with supporting records to your office as well email notifications sent by OMC to applicants for cannabis business licenses as part of the application review process. In order to accomplish that production by May 30, 2025, OMC staff spent numerous hours manually downloading each application with supporting materials into a single PDF file for each application. The title of each application PDF file contained the date of application submission, application number, and license category. That record production consisted of over 580,000 pages of records.

As noted in the letter accompanying the above-described production, in most cases an applicant would submit its initial application and supporting records and, after review and notice of deficiencies from the OMC, would then make corrections and submit different or additional

supporting documents for its final application submission. With this letter, the OMC is providing copies of the initial application submissions to the APA as well as the resubmitted applications (if applicable), supporting documents, and email communications from the business licensing system. OMC obtained this documentation through a specialized bulk download from the business licensing system. Accordingly, unlike the prior production where an application and supporting materials appeared as single PDF files, this production is provided as follows:

All application materials are contained within folders identified by their respective application numbers (e.g., 1001, 1002, 1003, etc.). Using 1001 as an example, once the 1001 folder is open, you will see a PDF of the initial application form fill (“app_1”), a PDF of the resubmitted application form fill (“app_3”), a subfolder containing the email notifications (entitled “emails”), and a subfolder containing all of the supporting documents submitted during the application process (entitled “documents”).¹ Supporting documents with a “v1_” at the beginning of the file name were part of the initial application submission; supporting documents with a “v3_” at the beginning of the file name were part of the resubmitted application submission.

Please note that applications that were not returned for correction only contain one version of the application form fill (“app_1”) and supporting documents (“v1_”).

It is estimated that this record production consists of well over 1.1 million pages of records.

Again, please be advised that information contained in the medical cannabis business license applications and the supporting documents included with the applications contain information that is held to be confidential, proprietary, or trade secret information to the Applicants. The OMC does not disclose this confidential, proprietary, or trade secret information to the public through Open Records requests or for any other reason. **The OMC expects that Applicants’ confidential, proprietary, or trade secret information being supplied to the APA will not be further disclosed to any other party or the public unless such disclosure is required by state or federal law.**

Respectfully,

A handwritten signature in blue ink, appearing to read "Cannon Armstrong", with a long horizontal line extending to the right.

Cannon Armstrong
Executive Director

¹ Please note that a new version of each application is automatically saved by the licensing system each time there is a material change to the application, including a change to its status in the system. For example, an “app_2” version of the application is created when an initial application is returned for correction to the applicant. This return for correction causes a status change in the system (i.e., from “Submitted” status to “Rejected” status), and therefore the system saves a new version of the application entitled “app_2” at that time. Because “app_1” and “app_2” are the same except for their status in the system, “app_2” was not provided.