



Eric Friedlander
Secretary

KENTUCKY OFFICE OF MEDICAL CANNABIS

Cabinet for Health and Family Services

275 East Main Street, 5W-A

Frankfort, Kentucky 40621

Sam Flynn
Executive Director

May 1, 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*

Dear Deputy Auditor Crouse:

On behalf of the Office of Medical Cannabis (OMC), I write in response to your letter and email dated April 17, 2025. Neither the letter nor the email specify the “operations” on which your office seeks to conduct “preliminary assessment procedures,” identify a single specific complaint or complainant, or define the scope of the review, which is a challenge. However, we will continue to fulfill our commitment to full transparency and offer this response.

On March 30, 2023, the General Assembly passed Senate Bill 47, setting out the statutory criteria and creating the legal framework for who could be a licensed business owner involved with the Kentucky Medical Cannabis Program. The legislation also outlined the restrictions and prohibitions on businesses to participate in the program. The following day, March 31, 2023, the Governor signed Senate Bill 47 into law, and began the process to establish OMC and promulgate regulations to meet the policy intent of the legislation.

In promulgating regulations, OMC followed the full notice-and-comment rulemaking process, which included an open public comment period for each regulation. OMC appeared before statutory and interim joint committees of the General Assembly six (6) times to answer questions, provide updates, and explain how the regulations worked and why we were doing it this way. The regulations were approved on numerous occasions by these statutory and interim joint committees of the General Assembly, allowing the process to move forward and lotteries to take place.

In implementing the regulations, OMC has been committed to full transparency, which is why we publicly advertised the lottery dates and streamed the proceedings live on YouTube, where all three lottery drawings continue to be archived for the public to view, in perpetuity. To date, no one has filed a legal challenge to Kentucky’s medical cannabis laws or OMC’s regulations. Any person who believes they have a valid legal claim always has recourse to have their claim heard in

court. The individuals who have come forward to express “concerns” to the media went through the process, but failed to express “concerns” until after not being selected in the lottery. To date, these individuals have filed exactly zero lawsuits related to their concerns. Of note, the U.S. Constitution prohibits wholesale exclusion of out-of-state businesses.

To add independence to the process, OMC partnered with the Kentucky Lottery Corporation to conduct the lotteries, removing any discretion OMC had to choose the businesses involved. The Lottery Corporation was chosen for this task because it is an independent, knowledgeable, and experienced third party with unique expertise in securing the selection process. As mentioned, to ensure full transparency, all three lottery drawings were televised and remain available to view, in their entirety, on YouTube. The lottery process has proven itself by no lawsuits being filed that would have needlessly delayed rollout of the program.

As the Governor has repeatedly stated, the goal of the Medical Cannabis Program is to get those who need it access to licensed, safe, and regulated medical cannabis in Kentucky as quickly as possible. As such, we will be fulfilling your request for documents on a rolling basis to ensure our focus remains squarely on the Kentucky patients who stand to benefit from the program.

1. APA Request No. 1: *All applications submitted for all types of medical cannabis business licenses.*

OMC Response: After a review of our records, the OMC estimates your request may generate hundreds of thousands of pages of records. We will be providing these records on a rolling basis. The initial production contains over 4,000 pages and provides records detailing the OMC’s processes and procedures for approval of medical cannabis business license sales, application processing records, Kentucky Lottery Corporation drawing-related records, materials from OMC’s licensee orientation program and subsequent partner agency webinars, and the OMC organizational chart. The OMC anticipates providing the final versions of the 5,002 medical cannabis business license applications with supporting documentation on or before May 30, 2025.

2. APA Request No. 2: *All documentation regarding approval of medical cannabis business license sales.*

OMC Response: Please see attached documentation of the seven (7) approved medical cannabis business license sales as of April 17, 2025. The OMC updates its website to reflect medical cannabis business sales, changes of location, etc. Available at <https://kymedcan.ky.gov/businesses/Pages/licensees.aspx>.

3. APA Request No. 3: *All policies and procedures governing the Kentucky Medical Cannabis Program and the programs - including but not limited to - the lottery process that has executed, currently executes, and has determined it will execute in the future.*

OMC Response: Please see attached records regarding the statutory and regulatory authority of the OMC, the application process and processing of applications, and Kentucky Lottery Corporation drawing-related records.

4. ***APA Request No. 4: All material used, presented, or otherwise relevant to orientation programs including but not limited to the orientation program conducted on January 15, 2025.***

OMC Response: Please see attached records of presentations at the OMC's licensee orientation program and subsequent partner agency webinars.

5. ***APA Request No 5: All internal and external communications, emails, text messages, and Microsoft Teams messages, to and from executive staff.***

OMC Response: As stated, neither the letter, nor the email, define the scope of your review. Please provide the basis and justification for your review, as well as the scope of your inquiry so that we can narrow our search to records relevant to your inquiry.

6. ***APA Request No. 6: OMC's organizational chart.***

OMC Response: Please see attached CHFS Organization Chart that includes the OMC.

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 regulation.

In sum, 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 also failed to identify a single complaint or complainant. Regardless, we will continue to uphold our commitment to full transparency with this program and are proud of the work we are doing to bring much-needed relief to Kentucky patients who qualify for a medical cannabis license. We will continue to work every day to make access to legal medical cannabis a reality for Kentucky patients in need.

Respectfully,



Sam Flynn
Executive Director
Kentucky Office of Medical Cannabis
Sam.Flynn@ky.gov

APPENDIX

Appendix: List of Records Provided in Response to April 17, 2025 Letter

APA Demand No. 1: All applications submitted for all types of medical cannabis business licenses.

- I. The Office of Medical Cannabis (OMC) received 5,002 applications for all types of medical cannabis business licenses and is currently in the process of compiling all of those final applications for production. As the records involved go into hundreds of thousands of pages, the OMC anticipates providing this information to the Kentucky Auditor of Public Accounts (APA) **on or before May 30, 2025.**
 - a. 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.**
 - b. Please also be advised that the OMC will provide the APA with the final applications and supporting documentation submitted by the Applicants for medical cannabis business licenses. In most cases, an Applicant would submit its initial application and supporting documentation and, after review and notice of deficiencies from the OMC, would then make corrections or submit different or additional supporting documents for its final application submission. Due to the volume of documents involved, the OMC is providing the APA with the final version of the submitted applications.
- II. In addition to the full applications, and though not requested by the APA, OMC is also providing the following notifications sent by OMC to applicants for cannabis business licenses as part of the application review process:
 - a. New Business License Application Status Update (Return for Correction) (if applicable)
 - b. New Business License Application Resubmitted Successfully (if applicable)
 - c. New Business License Application Complete and Eligible for the Lottery (if applicable)
 - d. New Business License License [sic] Approved (Invoice Initiated) (if applicable)
 - e. New Business License Application Approved (Invoice Paid and License Number Issued) (if applicable)

f. New Business License Application Denied (if applicable)

APA Demand No. 2: All documentation regarding OMC's approval of medical cannabis business license sales.

As of April 17, 2025, the OMC has approved seven (7) medical cannabis business license sales. Please be advised that information contained in the applications requesting sale of license 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.**

- I. #DISP0038056: Chung Woo Kim LLC to Picasso Cannabis LLC; Approved 1/13/25
 - a. 2024-12-27 Application to Request Sale of Cannabis Business License (10 pages)
 - b. Transition Plan (1 page)
 - c. Information Required for Entity and Individual Ownership (1 page)
 - d. CVs and Driver's License Information (5 pages)
 - e. Articles of Organization (1 page)
 - f. IRS EIN Letter (2 pages)
 - g. Operating Agreement (13 pages)
 - h. Site Plan (2 pages)
 - i. Security Plans (4 pages)
 - j. Contingent Commercial Lease (13 pages)
 - k. Financial Plan and Narrative (6 pages)
 - l. Organizational Chart (1page)
 - m. Operational Plan (39 pages)
 - n. Timeline to be Operational (1 page)
 - o. Documentation of Sufficient Capital (1 page)
 - p. Description of Roles and Responsibilities (1 page)
 - q. 2025-1-13 OMC Approval Letter (1 page)
- II. #CULT0008015: Elevated Essence LLC to KY Cultivation LLC; Approved 2/20/25
 - a. 2025-2-7 Application to Request Sale of Cannabis Business License (10 pages)
 - b. Business Entity Formation Document (1 page)
 - c. Documentation of Sufficient Capital (4 pages)
 - d. Income Statement and Financial Plan (1 page)
 - e. Lease (35 pages)
 - f. Organizational Structure (1 page)
 - g. Narrative of Financial Plan (3 pages)
 - h. Plan of Operation (14 pages)
 - i. Prior Business Experience (1 page)

- j. Resume (1 page)
- k. Description of Roles and Duties (1 page)
- l. Site Plan (3 pages)
- m. Time to be Operational (1 page)
- n. Transition Plan (2 pages)
- o. 2025-2-19 OMC letter requesting additional information (2 pages)
- p. 2025-2-19 email from Applicant representative re additional information (3 pages)
- q. 2025-2-19 OMC Approval Letter (1 page)

III. #CULT0010034: NG Health LLC to VS Kentucky Ops LLC; Approved 2/20/25

- a. 2025-2-14 Application to Request Sale of Cannabis Business License (9 pages)
- b. Information Required for Each Beneficial Owner, Officer, Director, and Financial Source (Individual) (1 page)
- c. Resume (1 page)
- d. Business Entity Formation Document (6 pages)
- e. Site Plan (2 pages)
- f. Contingent Purchase Agreement (8 pages)
- g. Financial Plan (10 pages)
- h. Ownership Organizational Structure Document (1 page)
- i. Summary of Intended Plan of Operation (89 pages)
- j. Timeline to be Operational (7 pages)
- k. Documentation of Sufficient Capital (1 page)
- l. Description of Duties, Responsibilities, and Roles (9 pages)
- m. Summary of Prior Business Experience (1 page)
- n. Transition Plan (2 pages)
- o. 2025-2-19 OMC letter requesting additional information (2 pages)
- p. 2025-2-20 email from Applicant representative with additional information (2 pages)
- q. Updated Application to Request Sale of Cannabis Business License (10 pages)
- r. Updated Documentation of Sufficient Capital (1 page)
- s. 2025-2-20 OMC Approval Letter (1 page)

IV. #CULT0004030: CW Bluegrass LLC to Flower Power 5390; Approved 4/11/25

- a. 2025-2-11 Application to Request Sale of Cannabis Business License (10 pages)
- b. CV (1 page)
- c. Articles of Organization (1 page)
- d. EIN Letter (3 pages)
- e. Site Plan (3 pages)
- f. Letter of Intent to Lease (2 pages)
- g. Financial Plan (3 pages)
- h. Ownership Information and Structure document (1 page)
- i. Operating Plan (49 pages)
- j. Timeline (1 page)

- k. Documentation of Sufficient Capital (1 page)
 - l. Duties, Roles, and Responsibilities document (6 pages)
 - m. Transition Plan (1 page)
 - n. 2025-2-21 OMC letter requesting additional information (2 pages)
 - o. 2025-3-3 email from Applicant representative with additional information (2 pages)
 - p. 2025-3-7 OMC letter requesting additional information (2 pages)
 - q. CW Bluegrass LLC Responses to Letter from OMC dated 3/7/25 (2 pages)
 - r. 2025-4-4 OMC letter requesting additional information (1 page)
 - s. CW Bluegrass LLC Revised Responses to Letter from OMC dated 3/7/25 (rev 4/7/25) (2 pages)
 - t. Updated Documentation of Sufficient Capital (1 page)
 - u. Updated Site Plan (3 pages)
 - v. Updated Ownership Information and Structure (1)
 - w. Updated Letter of Intent to Lease (2 pages)
 - x. Resume (2 pages)
 - y. Agreement for Sale and Purchase (5 pages)
 - z. Amendment to Agreement for Sale and Purchase (2 pages)
 - aa. Management Service Agreement (11 pages)
 - bb. 2025-4-11 OMC Approval Letter (1 page)
- V. #PROC0008005: AJ Alchemy Lab LLC to MD Derby LLC; Approved 3/18/25
- a. 2025-2-20 Application to Request Sale of Cannabis Business License (10 pages)
 - b. Resume (2 pages)
 - c. Articles of Organization (1 page)
 - d. EIN Letter (2 pages)
 - e. Site Plan (1 page)
 - f. Lease (4 pages)
 - g. Financial Plan (11 pages)
 - h. Ownership Organizational Structure Document (1 page)
 - i. Operating Agreement (4 pages)
 - j. Operational Plan (106 pages)
 - k. Timeline (6 pages)
 - l. Proof of Funds (2 pages)
 - m. Duties of Officers, Board Members, and Employees (8 pages)
 - n. Transition Plan (1 page)
 - o. Asset Purchase Agreement (27 pages)
 - p. 2025-3-5 OMC letter requesting additional information (1 page)
 - q. 2025-3-12 email from Applicant representative with additional information (2 pages)
 - r. Updated Lease (4 pages)
 - s. Driver's License Information (2 JPG files) (2 pages)
 - t. 2025-3-17 OMC Approval Letter (1 page)
- VI. #CULT0012041: Canopy Capital LLC to Centaurus Farm KY LLC; Approved 3/27/25

- a. 2025-3-5 Application to Request Sale of Cannabis Business License (10 pages)
- b. Bill of Sale (3 pages)
- c. Resume (2 pages)
- d. Business Entity Formation Documents (2 pages)
- e. Financial Plan (6 pages)
- f. Ownership Organizational Structure document (1 page)
- g. Summary of Intended Plan of Operation (48 pages)
- h. Description of Duties, Responsibilities, and Roles (105 pages)
- i. Timeline (1 page)
- j. Documentation of Sufficient Capital (1 page)
- k. Site Plan (7 pages)
- l. Assignment and Assumption of Lease (10 pages)
- m. Individuals & Entities of Interest Document (1 page)
- n. Transition Plan (2 pages)
- o. 2025-3-14 OMC letter requesting additional information (2 pages)
- p. 2025-3-17 Response Letter from Applicant (2 pages)
- q. 2025-3-26 OMC Approval Letter (1 page)

VII. #DISP0039034: ZenLeaf, Inc to KYLX Acquisition Company LLC; Approved 4/3/25

- a. 2025-3-21 Application to Request Sale of Cannabis Business License (10 pages)
- b. Cover letter (3 pages)
- c. Asset Purchase Agreement (48 pages)
- d. Individuals & Entities of Interest Documents (4 pages)
- e. Resumes (6 pages)
- f. Articles of Organization (1 page)
- g. Operating Agreement (9 pages)
- h. Real Estate Purchase Contract (24 pages)
- i. Lease Agreement (9 pages)
- j. Site Plan (1 page)
- k. Financial Plan – Narrative (3 pages)
- l. Financial Plan – Modeling (Excel)
- m. Organizational Chart (1 page)
- n. Summary of Intended Plan of Operation (27 pages)
- o. Operational Timeline (1 page)
- p. Documentation of Sufficient Capital (2 pages)
- q. Duties, Responsibilities, and Roles document (31 pages)
- r. Summary of Prior Business Experience (3 pages)
- s. Management Services Agreement (6 pages)
- t. Transition Plan (1 page)
- u. 2025-4-3 OMC Approval Letter (1 page)

APA Demand No. 3: All policies and procedures governing the Kentucky Medical Cannabis Program and the programs -- including but not limited to the lottery process --

that OMC has executed, currently executes, and has determined it will execute in the future.

- I. KRS Chapter 218B (62 pages)
- II. 915 KAR Chapter 1 (100 pages)
- III. 2024-7-15 Business Licensing Application Guide v.3 (83 pages)
- IV. Application Processing Records
 - a. 2024-4-18 Notice of initial cannabis business license application availability (3 pages)
 - b. 2024-6-10 Medical Cannabis Dispensary Licensing Regions Map (1 page)
 - c. 2024-6-28 Guidance re Provisional Licenses, Change of Location, and Lottery Selection for Dispensaries (4 pages)
 - d. 2024-7-1 Internal Memo re Procedure for Creation of Return for Correction Batch Document (1 page)
 - e. 2024-7-11 Guidance re Documentation of Sufficient Capital (2 pages)
 - f. 2024-7-26 Guidance re Applicants Seeking Clarification of Identified Deficiencies (3 pages)
 - g. 2024-8-1 Internal Memo re Procedure for Resubmittal Determinations and Assigning Unique Numerical Identifiers for Lottery Drawings (2 pages)
 - h. 2024-5-13 Application Period Training and Overview (6 pages)
 - i. Training Binder for OMC staff (as of July 29, 2024) (87 pages)
 - j. Business Licensing Application Review Schedule (June 2024) (1 page)
 - k. Business Licensing Application Review Schedule (July 2024) (1 page)
 - l. Reviewing a Business Application 2024 Training (initial) (33 pages)
 - m. 2024-6-25 Business Licensing Application Response Training (12 pages)
 - n. 2024-6-26 Business Licensing Application Intake Checklist (3 pages)
 - o. 2024-6-28 Business Licensing Application Review Checklist (standard) (2 pages)

- p. 2024-6-28 Business Licensing Application Review Checklist (expanded) (4 pages)
- q. 2024-7-18 Business Licensing Application Intake Checklist v.2 (3 pages)
- r. 2024-7-18 Business Licensing Application Review Checklist v.2 (standard) (2 pages)
- s. 2024-7-18 Business Licensing Applicant Review Checklist v.2 (extended) (4 pages)
- t. 2024-7-2 1st Line Review Intake Document (1 page)
- u. 2024-7-1 2nd Line Review Daily Intake Log (1 page)
- v. Standardized Response for Deficiencies document (version 1, version 1 with updates, and version 2) (36 pages)
- w. Return for Corrections Tags document (versions 1 through 6) (22 pages)
- x. 2024-5-9 Standard Operating Procedure – Completing the Application Review Checklist (58 pages)
- y. Return for Corrections Batch Documents (Batches 1 through Batch 19) (1,020 pages)
- z. Resubmittal Determination Documents (18 documents) (464 pages)
- aa. 2024-10-25 Denial Returns (Cultivators and Processors) (52 pages)
- bb. 2024-11-21 Denial Returns (Mountain) (6 pages)
- cc. 2024-11-21 Denial Returns (Cumberland) (14 pages)
- dd. 2024-11-21 Denial Returns (Green River) (18 pages)
- ee. 2024-11-21 Denial Returns (Lincoln Trail) (8 pages)
- ff. 2024-11-21 Denial Returns (Northeast) (11 pages)
- gg. 2024-11-21 Denial Returns (Northern Kentucky) (21 pages)
- hh. 2024-11-21 Denial Returns (Pennyrile) (12 pages)
- ii. 2024-11-21 Denial Returns (West Kentucky) (13 pages)

- jj. 2024-11-21 Denial Returns (South Central) (23 pages)
- kk. 2024-12-12 Denial Returns (Bluegrass) (34 pages)
- ll. 2024-12-12 Denial Returns (Kentuckiana) (51 pages)
- mm. 2024-7-1 Memorandum of Understanding between OMC and the Kentucky Department of Agriculture (KDA) (4 pages)
 - i. CHFS - KDA Hemp Licenses and Locations Report 7.1.24 (8 pages)
 - ii. CHFS - KDA Hemp Licenses and Locations Report 7.15.24 (12 pages)
 - iii. CHFS - KDA Hemp Licenses and Locations Report 7.31.24 (13 pages)
 - iv. CHFS - KDA Hemp Licenses and Locations Report 8.15.24 (13 pages)
 - v. CHFS - KDA Hemp Licenses and Locations Report 8.30.24 (13 pages)
- nn. 2024 Business Licensing Application Tracking document (46 pages)
- oo. 2024-10-2 Resubmission Date Tracker (Non-Dispensary Applicants) (16 pages)
- pp. 2024-11-26 Resubmission Date Tracker (Dispensary Applicants) (43 pages)

V. Kentucky Lottery Corporation Drawings Records

- a. 2024-4-17 Memorandum of Understanding for Draw Services Relating to the Selection of Eligible Medical Cannabis Business Licensees (6 pages)
- b. 2024-4-17 Cannabis Business Licensing Draw Services Rules (5 pages)
- c. 2024-9-3 Modification #1 to Memorandum of Understanding for Draw Services Relating to the Selection of Eligible Medical Cannabis Business Licensees (2 pages)
- d. 2024-9-3 Modification #1 to Cannabis Business Licensing Draw Services Rules (2 pages)
- e. 2024-10-28 Cultivator and Processor Lottery Drawings
 - i. 2024-10-25 Cultivator Tier I Lottery Eligible Applicants (.csv) (provided in native format; last modified 10/25/24 at 3:52 PM)
 - ii. 2024-10-25 Cultivator Tier II Lottery Eligible Applicants (.csv) (provided in native format; last modified 10/25/24 at 3:52 PM)

- iii. 2024-10-25 Cultivator Tier III Lottery Eligible Applicants (.csv) (provided in native format; last modified 10/25/24 at 3:52 PM)
- iv. 2024-10-25 Processor Lottery Eligible Applicants (.csv) (provided in native format; last modified 10/25/24 at 3:52 PM)
- v. 2024-10-25 Cultivator Tier I Lottery Eligible Applicants File (deidentified) (4 pages)
- vi. 2024-10-25 Cultivator Tier II Lottery Eligible Applicants File (deidentified) (4 pages)
- vii. 2024-10-25 Cultivator Tier III Lottery Eligible Applicants File (deidentified) (4 pages)
- viii. 2024-10-25 Processor Lottery Eligible Applicants File (deidentified) (7 pages)
- ix. 2024-10-28 Chain of Custody Document (Kentucky Lottery Corporation and OMC) (5 pages)
- x. 2024-10-28 Addendum to Chain of Custody Document (Kentucky Lottery Corporation and OMC) (2 pages)
- xi. 2024-10-28 Kentucky Lottery Official Drawing Records for processor and cultivator tiers I, II, and III drawings (total of 4 drawings) (4 pages)
- xii. 2024-10-28 REIDENTIFIED Cultivator Tier I Lottery Eligible Applicants File (5 pages)
- xiii. 2024-10-28 REIDENTIFIED Cultivator Tier II Lottery Eligible Applicants File (5 pages)
- xiv. 2024-10-28 REIDENTIFIED Cultivator Tier III Lottery Eligible Applicants File (4 pages)
- xv. 2024-10-28 REIDENTIFIED Processor Lottery Eligible Applicants File (7 pages)
- xvi. 2024-10-28 Notes prepared by Blake Vogt, Deputy General Counsel of the Cabinet for Health and Family Services (CHFS) (1 page)
- xvii. 2024-10-28 Notes prepared by Oran McFarlan, Deputy Executive Director of the OMC (2 pages)

- xviii. 2024-10-28 Notes prepared by Malaya Rivers, Executive Administrative Secretary with OMC (4 pages)
- f. 2024-11-25 Dispensary Lottery Drawings (Regions 3 through 11)
 - i. 2024-11-20 Region 3-Northeast Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 11:09 AM)
 - ii. 2024-11-20 Region 4-South Central Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 11:13 AM)
 - iii. 2024-11-20 Region 5-Cumberland Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:15 PM)
 - iv. 2024-11-20 Region 6-Mountain Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:48 PM)
 - v. 2024-11-20 Region 7-Pennyrile Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:47 PM)
 - vi. 2024-11-20 Region 8-West Kentucky Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:52 PM)
 - vii. 2024-11-20 Region 9-Lincoln Trail Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:47 PM)
 - viii. 2024-11-20 Region 10-Northern Kentucky Dispensary Eligible Lottery Applicants (.csv) (provided in native format; last modified 11/21/24 at 5:47 PM)
 - ix. 2024-11-25 Region 11-Green River Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 11/25/24 at 10:55 AM)
 - x. 2024-11-21 Region 3-Northeast Dispensary Lottery Eligible Applicants File (deidentified) (3 pages)
 - xi. 2024-11-21 Region 4-South Central Dispensary Lottery Eligible Applicants File (deidentified) (10 pages)
 - xii. 2024-11-21 Region 5-Cumberland Dispensary Lottery Eligible Applicants File (deidentified) (5 pages)

- xiii. 2024-11-21 Region 6-Mountain Dispensary Lottery Eligible Applicants File (deidentified) (2 pages)
- xiv. 2024-11-21 Region 7-Pennyrile Dispensary Lottery Eligible Applicants File (deidentified) (8 pages)
- xv. 2024-11-21 Region 8-West Kentucky Dispensary Lottery Eligible Applicants File (deidentified) (6 pages)
- xvi. 2024-11-21 Region 9-Lincoln Trail Dispensary Lottery Eligible Applicants File (deidentified) (7 pages)
- xvii. 2024-11-21 Region 10-Northern Kentucky Dispensary Lottery Eligible Applicants File (deidentified) (8 pages)
- xxiii. 2024-11-25 Region 11-Green River Dispensary Lottery Eligible Applicants File (deidentified) (9 pages)
- xix. 2024-11-25 Chain of Custody Document (Kentucky Lottery Corporation and OMC) (5 pages)
- xx. 2024-11-25 Addendum to Chain of Custody Document (Kentucky Lottery Corporation and OMC) (2 pages)
- xxi. 2024-11-25 Kentucky Lottery Official Drawing Records for Dispensary Regions 3 - 11 drawings (total of 9 drawings) (9 pages)
- xxii. 2024-11-25 REIDENTIFIED Region 3-Northeast Dispensary Lottery Eligible Applicants File (4 pages)
- xxiii. 2024-11-25 REIDENTIFIED Region 4-South Central Dispensary Lottery Eligible Applicants File (10 pages)
- xxiv. 2024-11-25 REIDENTIFIED Region 5-Cumberland Dispensary Lottery Eligible Applicants File (6 pages)
- xxv. 2024-11-25 REIDENTIFIED Region 6-Mountain Dispensary Lottery Eligible Applicants File (2 pages)
- xxvi. 2024-11-25 REIDENTIFIED Region 7-Pennyrile Dispensary Lottery Eligible Applicants File (8 pages)
- xxvii. 2024-11-25 REIDENTIFIED Region 8-West Kentucky Dispensary Lottery Eligible Applicants File (7 pages)

- xxviii. 2024-11-25 REIDENTIFIED Region 9-Lincoln Trail Dispensary Lottery Eligible Applicants File (8 pages)
- xxix. 2024-11-25 REIDENTIFIED Region 10-Northern Kentucky Dispensary Lottery Eligible Applicants File (8 pages)
- xxx. 2024-11-25 REIDENTIFIED Region 11-Green River Dispensary Lottery Eligible Applicants File (9 pages)
- xxxi. 2024-11-25 Notes prepared by Blake Vogt, Deputy General Counsel of CHFS (1 page)
- xxxii. 2024-11-25 Notes prepared by Oran McFarlan, Deputy Executive Director of the OMC (2 pages)
- xxxiii. 2024-11-25 Notes prepared by Malaya Rivers, Executive Administrative Secretary with OMC (9 pages)
- g. 2024-12-16 Dispensary Lottery Drawings (Regions 1 and 2)
 - i. 2024-12-12 Region 1-Bluegrass (Fayette Only) Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 12/12/24 at 3:44 PM)
 - ii. 2024-12-12 Region 1-Bluegrass (without Fayette) Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 12/12/24 at 4:40 PM)
 - iii. 2024-12-12 Region 2-Kentuckiana (Jefferson Only) Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 12/12/24 at 3:44 PM)
 - iv. 2024-12-12 Region 2-Kentuckiana (without Jefferson) Dispensary Lottery Eligible Applicants (.csv) (provided in native format; last modified 12/12/24 at 3:44 PM)
 - v. 2024-12-12 Region 1-Bluegrass (Fayette Only) Dispensary Lottery Eligible Applicants File (deidentified) (6 pages)
 - vi. 2024-12-12 Region 1-Bluegrass (without Fayette) Dispensary Lottery Eligible Applicants File (deidentified) (6 pages)
 - vii. 2024-12-12 Region 2-Kentuckiana (Jefferson Only) Dispensary Lottery Eligible Applicants File (deidentified) (8 pages)

- viii. 2024-12-12 Region 2-Kentuckiana (without Jefferson) Dispensary Lottery Eligible Applicants File (deidentified) (3 pages)
- ix. 2024-12-16 Chain of Custody Document (Kentucky Lottery Corporation and OMC) (5 pages)
- x. 2024-12-16 Addendum to Chain of Custody Document (Kentucky Lottery Corporation and OMC) (2 pages)
- xi. 2024-12-16 Kentucky Lottery Official Drawing Records for Dispensary Regions 1 and 2 drawings (total of 4 drawings) (4 pages)
- xii. 2024-12-16 REIDENTIFIED Region 1-Bluegrass (Fayette Only) Dispensary Lottery Eligible Applicants File (6 pages)
- xiii. 2024-12-16 REIDENTIFIED Region 1-Bluegrass (without Fayette) Dispensary Lottery Eligible Applicants File (6 pages)
- xiv. 2024-12-16 REIDENTIFIED Region 2-Kentuckiana (Jefferson Only) Dispensary Lottery Eligible Applicants File (8 pages)
- xv. 2024-12-16 REIDENTIFIED Region 2-Kentuckiana (without Jefferson) Dispensary Lottery Eligible Applicants File (3 pages)
- xvi. 2024-12-16 Notes prepared by Blake Vogt, Deputy General Counsel of CHFS (1 page)
- xvii. 2024-12-16 Notes prepared by Oran McFarlan, Deputy Executive Director of the OMC (1 page)
- xviii. 2024-12-16 Notes prepared by Malaya Rivers, Executive Administrative Secretary with OMC (4 pages)
- h. 2024-10-16 Notice of initial cannabis business license application availability (Safety Compliance Facility) (2 pages)
- i. Conflict of Interest forms signed by OMC staff and staff assigned to OMC (172 pages)

APA Demand No. 4: All material used, presented, or otherwise relevant to OMC's orientation programs, including but not limited to the orientation program conducted on January 15, 2025.

- I. 2025-01-14 Cannabis Business Licensee Orientation Slides (60 pages)

- II. 2025-03-20 Business Licensee Webinar Slides (Partner Agency Requirements) (61 pages)
- III. 2025-03-21 Business Licensee Webinar Slides (Kentucky Energy and Environment Cabinet and Department of Workforce Development) (34 pages)

APA Demand No. 5: All internal and external communications, emails, text messages, and Microsoft Teams messages, to and from executive staff.

Please see attached letter, dated May 1, 2025, and inform the OMC of the scope of the APA's inquiry so that the OMC may review, identify, and produce records relevant to the inquiry. Again, at this time, the scope of the APA inquiry and this demand is undefined and thus the OMC cannot provide an estimate of when it anticipates producing records within this category. Upon receipt of additional information from the APA regarding the scope of this inquiry, the OMC will provide an estimate for additional production of records. It is anticipated that any additional production will occur on a rolling basis.

APA Demand No. 6: OMC's organizational chart.

- I. 2025-4-17 CHFS Organization Chart including OMC (1 page)