



AlaFile E-Notice

03-CV-2023-901165.00

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NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

VERANO ALABAMA, LLC V. ALABAMA MEDICAL CANNABIS COMMISSION
03-CV-2023-901165.00

The following complaint was FILED on 8/21/2023 4:19:11 PM

Notice Date: 8/21/2023 4:19:11 PM

GINA J. ISHMAN
CIRCUIT COURT CLERK
MONTGOMERY COUNTY, ALABAMA
251 S. LAWRENCE STREET
MONTGOMERY, AL, 36104

334-832-1260



Case:

03

Date of Filing:

08/21/2023

Judge Code:

State of Alabama
Unified Judicial System
Form ARCiv-93 Rev. 9/18

COVER SHEET
CIRCUIT COURT - CIVIL CASE
(Not For Domestic Relations Cases)

GENERAL INFORMATION

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA
VERANO ALABAMA, LLC v. ALABAMA MEDICAL CANNABIS COMMISSION

First Plaintiff: Business Individual Government Other
First Defendant: Business Individual Government Other

NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:

TORTS: PERSONAL INJURY

- WDEA - Wrongful Death
- TONG - Negligence: General
- TOMV - Negligence: Motor Vehicle
- TOWA - Wantonness
- TOPL - Product Liability/AEMLD
- TOMM - Malpractice-Medical
- TOLM - Malpractice-Legal
- TOOM - Malpractice-Other
- TBFM - Fraud/Bad Faith/Misrepresentation
- TOXX - Other: _____

TORTS: PERSONAL INJURY

- TOPE - Personal Property
- TORE - Real Property

OTHER CIVIL FILINGS

- ABAN - Abandoned Automobile
- ACCT - Account & Nonmortgage
- APAA - Administrative Agency Appeal
- ADPA - Administrative Procedure Act
- ANPS - Adults in Need of Protective Service

OTHER CIVIL FILINGS (cont'd)

- MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve
- CVRT - Civil Rights
- COND - Condemnation/Eminent Domain/Right-of-Way
- CTMP - Contempt of Court
- CONT - Contract/Ejection/Writ of Seizure
- TOCN - Conversion
- EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division
- CVUD - Eviction Appeal/Unlawful Detainer
- FORJ - Foreign Judgment
- FORF - Fruits of Crime Forfeiture
- MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition
- PFAB - Protection From Abuse
- EPFA - Elder Protection From Abuse
- QTLB - Quiet Title Land Bank
- FELA - Railroad/Seaman (FELA)
- RPRO - Real Property
- WTEG - Will/Trust/Estate/Guardianship/Conservatorship
- COMP - Workers' Compensation
- CVXX - Miscellaneous Circuit Civil Case

ORIGIN: F **INITIAL FILING** A **APPEAL FROM DISTRICT COURT** O **OTHER**
R **REMANDED** T **TRANSFERRED FROM OTHER CIRCUIT COURT**

HAS JURY TRIAL BEEN DEMANDED? YES NO **Note:** Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)

RELIEF REQUESTED: **MONETARY AWARD REQUESTED** **NO MONETARY AWARD REQUESTED**

ATTORNEY CODE:

WIL070

8/21/2023 4:19:06 PM

/s/ E. Hamilton Wilson Jr.

Date

Signature of Attorney/Party filing this form

MEDIATION REQUESTED: YES NO UNDECIDED

Election to Proceed under the Alabama Rules for Expedited Civil Actions: YES NO



IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

VERANO ALABAMA, LLC,

Plaintiff,

v.

ALABAMA MEDICAL
CANNABIS COMMISSION,

Defendant.

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Civil Action No. 2023-_____

COMPLAINT AND PETITION FOR JUDICIAL REVIEW

COMES NOW the Plaintiff, Verano Alabama, LLC (“Verano Alabama”), and files this complaint and petition for judicial review and other relief against the Defendant, Alabama Medical Cannabis Commission (the “Commission”):

THE NATURE OF THE AGENCY ACTION

1. The nature of the agency action that is the subject of this Petition is: the Commission’s exercise of power which both exceeds and conflicts with the authority provided to it by the Alabama Legislature; the Commission’s failure to adhere to and abide by its own administrative rules; and the Commission’s actions which were unreasonable, arbitrary, or capricious or an abuse of discretion.

THE PARTICULAR AGENCY ACTION APPEALED FROM

2. The particular agency action appealed from is the Commission’s August 10, 2023, improper “voiding” of the licenses it previously awarded on June 12, 2023.

**THE FACTS AND LAWS UPON WHICH
JURISDICTION AND VENUE ARE BASED**

3. Verano Alabama is an Alabama limited liability company, that applied for, was awarded, and was invoiced and paid for an Integrated Facility license by the Commission on June 12, 2023.

4. The Commission is the licensing board created by the Darren Wesley “Ato” Hall Compassion Act (the “Hall Compassion Act”), § 20-2A-1 et seq., Ala. Code 1975,¹ for the purpose of licensing medical cannabis cultivators, processors, transporters, and dispensaries in the State of Alabama. Pursuant to the Hall Compassion Act, the Commission is subject to the Alabama Administrative Procedure Act (the “Administrative Procedure Act”), § 20-2A-20(p), Ala. Code, which provides the “minimum procedural code for the operation of all state agencies when they take action affecting the rights and duties of the public.” Ala. Code, § 41-22-2(a).

5. Section 20-2A-57(c), Ala. Code, provides that “[t]he commission shall comply with the hearing procedures of the Administrative Procedure Act when denying, revoking, suspending, or restricting a license....”.

6. Nothing in the Alabama Code or the Hall Compassion Act provides the Commission authority to “void” a license.

7. Section 20-2A-57(f), Ala. Code, grants any person who is aggrieved by an action of the Commission under the section the right to appeal the action in the circuit court where the Commission is located. Section 41-22-20(a), Ala. Code, provides for immediate review where an administrative review of an agency’s procedural act will not provide an adequate remedy. The following facts, which are discussed in more detail below, provide the basis for this petition.

¹ Unless otherwise noted, each code reference is to the Alabama Code 1975 (as amended).

- The Commission is authorized to issue only five (5) Integrated Facility licenses.
- On June 12, 2023, the Commission awarded Verano Alabama an Integrated Facility license as the top ranked applicant by total weighted score.
- On June 12, 2023, the Commission awarded the remaining Integrated Facility licenses to the next top four ranked applicants by total weighted score.
- On August 10, 2023, the Commission attempted to “void” all the previously awarded licenses, including the five awarded Integrated Facility licenses.
- On August 10, 2023, the Commission attempted to “re-award” all five Integrated Facility licenses.
- Verano Alabama, although still the top ranked applicant by total weighted score, was not “re-awarded” an Integrated Facility license without explanation or the opportunity to be heard.
- The Commission has no statutory authority to “void” a previously awarded license.
- The Commission has no rule authority to “void” a previously awarded license.
- Because no Integrated Facility licenses are available for award following the Commission’s August 10, 2023 re-award process, there is no adequate remedy that may be obtained following a review of this invalid procedural action.²

Pursuant to §§ 20-2A-57 and 41-22-20, Ala. Code, and based upon these facts, this Court has jurisdiction of this appeal.

8. Venue of this action is appropriate in Montgomery County pursuant to §§ 20-2A-57(f) and 41-22-20(b), Ala. Code.

² For this same reason, a suggestion of the need to exhaust any administrative remedies fails. “The doctrine [exhaustion of administrative remedies] does not apply when ... the exhaustion of administrative remedies would be futile and/or the available remedy is inadequate, or ... where there is the threat of irreparable injury.” *Ex parte Lake Forest Property Owners’ Ass’n*, 603 So. 2d 1045, 1046-47 (Ala. 1992). The requested remedy, maintaining the awarded license, no longer exists. The Commission has awarded six (6) Integrated Facility licenses and “voided” one, that issued to Verano Alabama. As such, even if the Commission had provided a point of entry to challenge the action, because the Commission acted so quickly, i.e., at the same August 10, 2023 hearing, and “re-awarded” the license, any administrative remedy is moot.

9. Prior to commencing this complaint for judicial review, Verano Alabama has served the Commission with a notice of appeal and appropriate cost bond, as required by 41-22-20(b), Ala. Code.

GROUND ON WHICH RELIEF IS SOUGHT

Factual Background

A. Verano Alabama was Awarded a License by the Commission

10. In December 2022, Verano Alabama timely filed its initial application for a medical cannabis license with the Commission, specifically an Integrated Facility license. On March 23, 2023, Verano Alabama timely completed its application for licensure.

11. Verano Alabama was one of approximately ninety (90) applicants for a medical cannabis license, and one of the thirty-eight (38) applicants for the five (5) Integrated Facility licenses, to be awarded by the Commission.

12. Pursuant to the Commission’s rule, the term “license awarded” refers to the **“Commission’s decision to grant a license to a particular Applicant, after which the Applicant has the obligation to pay the license fee.”** Regulation 538-x-3-.02.11, Ala. Code. Section 41-22-3, Ala. Code, defines a license as the “whole or part of an agency franchise, permit, certificate, approval ... or similar form of permission required by law.”

13. On or about June 12, 2023, the Commission released its scoring and ranking of all applicants. Verano Alabama received the highest weighted score of all the applicants for licensure. *Alabama Medical Cannabis Commission Combined Summary Report* [Index, p. 1]. On June 12, 2023, the Commission met and voted six times on the awarding of the various types of licenses. “The sixth and final decision item presented by [the Chairman] was **a vote to award integrated facility licenses to ... Flowerwood Medical Cannabis, LLC; Southeast Cannabis Company, LLC;**

Sustainable Alabama, LLC; TheraTrue Alabama, LLC; and *Verano Alabama, LLC.*” *Alabama Medical Cannabis Commission Meeting Minutes*, June 12, 2023 [Index, p. 10].³ At the meeting, a motion was made to award the Integrated Facility licenses to Verano Alabama and the four other named entities. *Id.* The motion was seconded and approved by the Commission. *Id.*

14. After this final vote, the Chairman of the Commission “*congratulated those who had been awarded licenses* and expressed the Commission’s enthusiasm to work with them to begin Alabama’s medical cannabis industry.” *Id.* The Chairman concluded the license award process by discussing “the upcoming deadlines to pay license fees and file for investigative hearing.”⁴ *Id.*

15. Shortly after the completion of the June 12, 2023, Commission meeting, Verano Alabama received its invoice for payment of the \$50,000 license fee for the Integrated Facility license. [Index, pp. 11-12]. Verano Alabama paid its Integrated Facility Annual license fee of \$50,000 on the same day of its award, June 12, 2023. [Index., p. 12].

³ *Ex parte King*, 364 So. 2d 318, 318 (Ala. 1978) (evidence may be accepted in the reviewing court to demonstrate procedural irregularities by the agency); *see also W.A.A. v. Board of Dental Examiners of Ala.*, 180 So. 3d 25, 28-30 (Ala. Civ. App. 2015).

⁴ At the very end of the meeting, the Chairman made an errant reference to the Commission then being scheduled to “award” licenses at the next meeting on July 10, 2023. According to the Commission rules, after the June 12, 2023 awards, the next step in the process would actually be “issuance” of the licenses. As the awards had already been decided, it is presumed this “issuance” is the action to which the Chair was referring. *See* Regulations 538-x-3-.15 through 538-x-3-.17, Ala. Admin. Code. This position is buttressed by the Commission’s rule which recognizes the need to delay issuance of some or all licenses due to the pendency of hearings or appeals. Regulation 528-x-3-.18, Ala. Admin. Code. Regardless, any suggestion that this statement demonstrates that no license was awarded is without merit and contrary to the express votes of the Commission. Further, the statement of an individual Commission member, even the Chair, carries no legal weight.

B. The Commission Stayed the Issuance of the Awarded Licenses

16. Verano Alabama is not aware, nor was it provided a copy, of any petition or request challenging its awarded license. Further, Verano Alabama has not been provided any information as to the basis for any challenge to its awarded license.

17. Nevertheless, on June 16, 2023, the Commission held a virtual meeting at which it voted “to stay all proceedings related to the current offering of medical cannabis business licenses.” *Alabama Medical Cannabis Commission Meeting Minutes*, June 16, 2023 [Index, p. 13]. The stay was “recommended due to the discovery of potential inconsistencies in the tabulation of score data [and to] seek an independent review of all scoring data.” *Id.* While arguably a legitimate goal on its face, the Commission’s subsequent actions makes clear that correcting a scoring error was not the true purpose of the stay.

18. On August 7, 2023, a hearing was conducted on pending motions requesting a temporary restraining order to prevent the Commission from taking any further actions with respect to the awarded licenses. At this hearing, William Webster, Esq., counsel for the Commission, acknowledged that the next step was issuance of the license but that “prior to the time that licenses are issued, *the Commission has the power to stay their own proceedings and not issue licenses, pending the outcome of the investigative proceedings.*” *Transcript of Proceeding for Temp. Rest. Order, Alabama Always, LLC v. State of Alabama Medical Cannabis Comm.*, CV-2023-231 (Aug. 7, 2023) [Index, p. 22]. Later David McKnight, Esq., for Sustainable Alabama, clarified the terms “award” and “issuance” noting that “[t]he licenses were awarded back in June, but they haven’t been issued.” *Id.* at 29. To which the Honorable Judge Anderson agreed and replied “[t]hey stayed that.” *Id.*

C. The Commission Improperly Voided the Awarded Licenses

19. Shortly before its August 10, 2023, Commission meeting, the Commission published a revised agenda. Section VII of the Commission’s August 10, 2023, meeting agenda included, in part, the following two “Decision Item(s):”

A. Lift Commission-Imposed Stay as to the Licensing Process

B. **Void License Awards** from June 12, 2023, Commission Meeting.

Alabama Medical Cannabis Commission, Meeting Agenda (Rev.), August 10, 2023 [Index, p. 33].

20. On August 10, 2023, the Commission approved the minutes from the June 12, 2023, meeting, including the portion of that meeting which confirmed Verano Alabama’s license award. *Alabama Cannabis Commission Meeting Transcript, June 12, 2023 [Index, pp. 35-36].* Consistent with the “Decision Item(s)” outlined in the agenda, the Commission also voted to lift the stay. *Id.* at 37. Immediately after the vote to lift its self-imposed stay, the Chair raised the next item for discussion, “**to void the license awards** from our June 12th Commission meeting. This will be a decision – **to void the license awards** from June 12th.” *Id.* The Chair continued:

As you are aware, the following --following the June 12th meeting, the inconsistencies that were found in the tabulation and calculation of scores caused us to put a stay on our processes. We now have received corrected and verified calculations. And in an effort to be certain that the voting on licenses is supported by accurate data, we need to void the previous licenses awarded and consider that information in re-awarding new licenses.^[5]

Id. (emphasis added). The Chair then asked for a motion to void the previous licenses awarded, which was moved, seconded and approved. *Id.*

⁵ It is unclear whether the Chairman intentionally misled the Commission as to the reason to void the prior votes or whether the decision to disregard the “corrected and verified calculations” was the idea of another Commissioner. Regardless, it is now apparent that the attempt to “void” the licenses was solely to replace one previously awarded licensee with another without consideration of the applicable rules.

21. The Commission next recessed so that it could conduct an “Executive Session” in private—purportedly to discuss the general reputation, character and competence of individuals.⁶ During the Executive Session, the Commission received a revised Combined Summary Report with the new scores and rankings. After the Commission’s independent review of the “potential inconsistencies” in the tabulation of score data, Verano Alabama remained the highest ranked applicant with the highest total weighted score—in fact, Verano Alabama’s score actually *increased* from the previous calculations. *Alabama Medical Cannabis Commission Combined Summary Report (Revised)* [Index, p. 74]. The Commission then proceeded with a vote to “re-award” the licenses, with all but two of the awardee licensees maintaining their awards. Despite remaining the highest scored applicant, Alabama Verano was one of the two applicants awarded licenses who were not “re-awarded” their license.⁷

22. It is now clear the Commission exceeded the limitations for an Executive Session and followed a procedure to “re-award” licenses that was not properly adopted in rule—and more importantly, appears to have been targeted in such a fashion as to use the presumptive “scoring inconsistencies in the tabulation of score data” as a Trojan Horse to improperly throw out the scoring altogether, unilaterally void a valid license that was awarded to the highest-scoring

⁶ Verano Alabama does not dispute the authority of the Commission to conduct executive sessions to discuss topics such as “the general reputation and character, physical condition, professional competence, or mental health of individuals.” However, as with all other actions of the Commission, this authority is not limitless. Topics not specifically identified in § 36-25A-7, of the Alabama Open Meetings Act, may not be included in executive session. Based upon the subsequent discussions of the Commission, it appears that the Commission’s executive session exceeded its granted authority.

⁷ Should this Court somehow determine that the Commission had the authority to “void” previously approved licenses without complying with the statutory requirements of notice and hearing, then Verano Alabama will be grouped with the other unsuccessful applicants entitled to an investigative hearing. However, due to the limited number of Integrated Facility licenses available (5), pursuant to the *Ashbacher* Doctrine, the Commission will be required to stay the issuance of any Integrated Facility licenses to allow a fully comparative review of all applications. *Ashbacher Radio Corp. v. FCC*, 326 U.S. 327 (1945) (requiring consideration of competing applications). In an abundance of caution and to protect its right to due process, Verano Alabama will be filing a Request for Investigative Hearing challenging the “re-awards” of the Integrated Facility licenses and the “denial” of its application.

applicant after final agency vote on June 12, 2023, and re-award the license to another company without legal justification. These actions violated both the requirements of the Alabama Open Meetings Act and the Administrative Procedure Act. The numerous errors made by the Commission have been fully identified in various pleadings⁸ and will not be rehashed here as they are not relevant for purposes of this Petition. Regardless, once this Court invalidates the Commission's improper attempt to "void" the original awards, these additional "actions" taken during the Executive Session become moot. Similarly, the need to invalidate the Commission's uses of this unadopted process to "re-award" licenses need not be addressed at this time.⁹

Applicable Law

23. The Administrative Procedure Act was implemented to provide the "minimum procedural code for the operation of all state agencies when they take action affecting the rights and duties of the public." Most importantly, for this matter, the Administrative Procedure Act was intended to "[i]ncrease the fairness of agencies in their conduct of contested case proceedings." § 41-22-2, Ala. Code.

24. Judicial review of the Commission's action is subject to the Administrative Procedure Act and this Court's review of the Commission's action and its application of the law is *de novo*. *Ex parte STV One Nineteen Senior Living, LLC*, 161 So. 3d 196, 202 (Ala. 2014); *see also Medical Licensure Comm'n of Alabama v. Herrera*, 918 So. 2d 918, 926 (Ala. Civ. App. 2005)

⁸ *See, e.g., Alabama Always, LLC v. Alabama Medical Cannabis Commission, Case No. CV-2023-000231, Motion for Temporary Restraining Order and Preliminary Injunction for Violation of the Alabama Open Meetings Act* (Aug. 15, 2023); *Alabama Always, LLC v. Alabama Medical Cannabis Commission, Case No. CV-2023-000231, McNeill Motion to Intervene* (Aug. 17, 2023).

⁹ While the admitted actions of the Commission include violations of both the Administrative Procedure Act and Alabama's Open Government Act, it is Verano Alabama's goal to return this process to the "status quo" as it existed on June 12, 2023, thereby allowing the administrative process to run its proper course and avoiding the need to invalidate the latest actions of the Commission.

(“[T]here is no presumption of correctness afforded to [an administrative decision-maker’s] legal conclusions or its application of the law to the facts.”).

25. Pursuant to § 41-22-17, Ala. Code, a circuit court may reverse an agency’s decision if a party’s substantial rights have been prejudiced because the agency action is:

- (1) In violation of constitutional or statutory provisions;
- (2) In excess of the statutory authority of the agency;
- (3) In violation of any pertinent agency rule;
- (4) Made upon unlawful procedure;
- (5) Affected by other error of law;
- (6) Clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record; or
- (7) Unreasonable, arbitrary or capricious or characterized by an abuse of discretion or a clearly unwarranted exercise of discretion.

Ala. Code, § 41-22-20(k). Here, the question submitted for judicial review is whether the Commission’s vote to unilaterally “void” the previously awarded licenses exceeded the Commission’s statutory authority, violated the Commission’s rule, was based upon an unlawful procedure and/or was arbitrary or capricious.

26. As a legislatively created body, the Commission has no more and no less authority than it has been granted by the Alabama Legislature. *Woodruff v. Beeland*, 127 So. 235 (1930); *see also Jefferson County Bd. of Ed. v. Alabama Bd. of Cosmetology*, 380 So. 2d 913 (Ala. Civ. App. 1980) (citing *Alabama State Board of Optometry v. Busch Jewelry Co.*, 75 So. 2d 121 (Ala. 1954) (“Rules and regulations and administrative action cannot subvert nor enlarge upon statutory policy.”)). While the Commission’s rules (and the Administrative Procedure Act) establish a method for challenging the Commission’s decision to deny and award licenses, notably absent from the

Commission's rules¹⁰ is the ability for the Commission to "void" previously awarded licenses on its own motion.

27. The Commission provided no explanation of, or citation to, any statutory or rule authority to support its act of purportedly "voiding" all prior awarded licenses.

28. To the extent the Commission would suggest its rule provides it with unfettered discretion in how it proceeds, that rule would be directly contrary to the procedures established in both the Administrative Procedure Act and the Hall Compassion Act and would likewise be invalid. *Ex parte City of Florence*, 417 So. 2d 191, 193–94 (Ala. 1982) ("It is axiomatic that administrative rules and regulations must be consistent with the ... statutory authority by which their promulgation is authorized. A regulation ... which operates to create a rule out of harmony with the statute, is a mere nullity.").

29. In sum, regardless of the Commission's intent when it decided to issue the stay and subsequently "re-award" the licenses, its decision to "void" previously awarded licenses without following the Legislature's—and its own—clearly established rules and regulations, exceeds and violates the statutory authority it has been granted, violates its own rule, and is clearly erroneous. As such, Verano Alabama's awarded license remains valid.

¹⁰ The Administrative Procedure Act specifies a process by which an agency is required to adopt by rule and defines a "rule" as any "statement of general applicability that implements, interprets, or prescribes law or policy ... or that describes the organization, procedure, or practice requirements of any agency...." Ala. Code, § 41-22-3. The Commission's "voiding" of the prior awards (and subsequent "re-awards") procedure, while legally questionable from a pure lack of statutory authority argument, failed to comply with the proper adoption procedures of the Administrative Procedure Act. As such, the unadopted procedure is invalid. Ala. Code, § 41-22-10. An administrative rule out of harmony with statutory law is a nullity, *Alabama Dep't of Revenue v. Jim Beam Brands Co.*, 11 So. 3d 858, 864 (Ala. Civ. App. 2008), because an administrative agency has no power to adopt a rule or regulation that subverts or enlarges upon statutory policy. *Ex parte Jones Mfg. Co.*, 589 So. 2d 208, 210 (Ala. 1991); *see also* Ala. Code § 41-22-4(2)(b) ("No agency rule, order, or decision shall be valid ... nor may it be invoked by the agency for any purpose until it has been made available for public inspection and indexed as required by this section and the agency has given all notices required by Section 41-22-5."). Based upon this same argument, the Commission's new review and award process is invalid.

THE RELIEF SOUGHT

WHEREFORE, Plaintiff for the reasons provided above, the respectfully requests that this Court take jurisdiction of this action, and enter appropriate orders for the following relief:

- A. Granting, as a matter of right, a stay of the Commission’s “voidance” of Verano Alabama’s awarded license;
- B. Reversing the August 10, 2023 vote of the Commission to “void” Verano Alabama’s Integrated Facility license award;
- C. Directing the Commission to issue Verano Alabama its validly awarded Integrated Facility license pending any timely filed requests for investigative review;
- D. Awarding all other appropriate relief from the Commission action, equitable or legal, including declaratory relief, pursuant to § 41-22-20(k), Ala. Code; and
- E. Awarding Verano Alabama all costs of this action.

s/ E. Hamilton Wilson

E. HAMILTON WILSON (WIL070)

B. SAXON MAIN (MAI005)

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