

WILLIAM JACOB PENNSTROM

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The goal: one quality system across GTI's 20 facilities in 13 states. One document system, one spec library, one CAPA log and one audit program, with every site on a dated path to a third-party GMP audit within 24 months. The first 90 days are about seeing every site, standardizing what can be standardized now, and leaving with a plan leadership has signed off.

DAYS 1-30

Walk and assess

- **Walk all 20 facilities** with one GMP gap checklist covering document control, batch records, deviation and CAPA, change control, training, supplier controls, sanitation and internal audit.
- **Meet every site Quality Manager** one-on-one: scope, staffing, open issues and what gets in their way.
- **Baseline the backlog:** open NCR, OOS and CAPA items, complaints, holds, and how each site uses the eQMS today.
- **Review inspection history** and regulator correspondence state by state.

Deliverable: Day-30 readout: a gap map of every site against every QMS element, with the top risks named.

DAYS 31-60

Standardize

- **One spec library:** specifications and release criteria for flower, pre-roll, vape, concentrate and edibles, set to the strictest applicable state rule.
- **One hold-and-release practice** at every site, with a daily hold board.
- **Triage the CAPA backlog by risk;** close or date-plan every overdue high-risk item.
- **Start the weekly site QM huddle** and consolidate the approved-supplier list.

Deliverable: Spec library v1 issued and a dated CAPA recovery plan.

DAYS 61-90

Plan and launch

- **Choose the Wave 1 lead sites** from the gap data, covering every modality.
- **Publish a 24-month GMP roadmap:** foundation in months 0-3, then three waves of sites to third-party GMP audit.
- **Launch quality scorecard v1:** right first time, OOS rate, CAPA on time, complaints and audit score, by site, monthly.
- **Set the internal audit calendar** and the certification path, including SQF or ISO where the business case supports it.

Deliverable: Day-90 readout: roadmap, resourcing ask and a live scorecard.

OPERATING RHYTHM FROM DAY 60

DAILY	WEEKLY	MONTHLY	QUARTERLY
Hold-and-release board	Site QM huddle	Quality scorecard per site	Internal audits

WHAT DONE LOOKS LIKE AT DAY 90

- **20 of 20 sites assessed** against one GMP gap checklist, with results reviewed by each site's Quality Manager.
- **Spec library v1 issued** for all five product categories, with release criteria every site applies the same way.
- **Every overdue high-risk CAPA** closed or on a dated plan with a named owner.
- **Quality scorecard live** and reviewed monthly with operations leadership.
- **Wave 1 lead sites named** and the 24-month GMP roadmap approved.

WHY I CAN DELIVER IT

- **Built an EU GMP and GACP quality system from a blank page** at Vertis: document control, master SOPs and batch records, deviation and CAPA, change control, training and qualification, supplier controls, sanitation and internal audit. Live across all departments, certification audit pending.
- **Authored a federally compliant HACCP plan** covering an entire product catalog; certified internal GMP auditor (2026).
- **Recruited to remediate compliance** at Venom Extracts, a publicly traded multi-state operator's flagship Arizona brand; ran two California plants with process and formulation transfer between sites.

Assumptions to confirm: reporting line, site Quality Manager structure and current eQMS platform. The plan adjusts to what the first 30 days show.