CONFIDENTIAL OPERATING DEVELOPMENT PLAN

Agricultural Renewal Trust

Operating Development and Program Activation Plan

Working name subject to legal confirmation

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Confidential - Internal Operating Information - Not for Public Distribution

> Document status. This plan begins after the Agricultural Renewal Trust has been legally created, funded, banked, and administratively established. It directs the work required to build the three agricultural programs and place the operating fiduciaries and alternates in office. It does not itself appoint a fiduciary, authorize an agricultural case, or replace the Trust Agreement, contractor agreements, approved program policies, financial controls, or professional advice.

Purpose and Stage Boundary

The purpose of this stage is to convert a legally formed and funded Trust into a functioning agricultural-assistance operation for farms, ranches, agricultural producers, and related agricultural businesses. The work is limited to the minimum people, policies, controls, records, vendor relationships, and operating resources needed to begin responsibly in Pontotoc County, Oklahoma. It is not the formation of the larger Farm & Ranch Renewal Alliance (FRRA), and FRRA has no authority over the Trust unless a later written legal action creates that relationship.

The Trust will begin the three continuing programs described below. They are not temporary pilot labels that disappear when FRRA is formed. If the programs are later incorporated into a larger FRRA infrastructure, they are intended to continue providing the same basic assistance with broader reach, additional personnel, and more developed resources.

- **Essential Operations Assistance.** Address an essential operating problem before it becomes a major business disruption.
- **Agricultural Emergency & Business Disruption Recovery.** Stabilize and restore a viable operation after a serious event has interrupted or materially reduced operations, including properly limited support for normal payroll and existing employer benefits when needed to preserve the existing workforce during restoration.
- **Agricultural Resource & Gap Assistance.** Identify and coordinate available insurance, lenders, federal, state, local, and tribal agricultural programs, manufacturers, foundations, disaster-relief organizations, educational resources, and other assistance, then provide approved supplemental, bridge, replacement, gap, or sole-source support when those resources do not fully or timely meet a documented need.

Operating Development and Trustee Transition begins only after the Formation Completion Record is signed. It ends only when the operating package is approved, the operating fiduciaries and alternates have accepted office, banking and accounting authority has been converted and tested, and a written Program Activation action permits the first case to be accepted.

This plan is intended for the Initial Trustee, Oklahoma counsel, the CPA or bookkeeper, the banker, retained agricultural and financial development managers, other advisors whose work is requested, and the persons later considered for operating fiduciary or alternate offices. It is an internal working document rather than a public explanation of the Programs.

Working Terms Used in This Plan

Agricultural case. A matter accepted after Program Activation for evaluation or administration under one or more Programs. Acceptance for evaluation is not approval and creates no promise of assistance.

Development contractor. A person retained under a service agreement to develop the operating system or perform another defined startup task. A development contractor is not a fiduciary and has no Trust authority beyond the written service agreement and any separate limited delegation.

Operating fiduciary. A person formally appointed to and accepting the Agricultural Program Co-Trustee, Administrative and Financial Co-Trustee, Trust Director or Trust Protector, alternate, temporary, or special fiduciary office described in the Trust Agreement and governing appointment records.

Operating package. The approved common policies; three program-specific policy sections; authority and exception schedules; operating budget and program-reserve record; case, payment, provider, conflict, and records forms; initial provider and resource directory; banking, accounting, confidentiality, continuity, and risk controls; and completed readiness-test record.

Program Activation. The signed written action that identifies the operating fiduciaries and alternates in office, approved policy versions, converted and tested controls, available resource and reserve reference, activated Programs, initial service area, and effective date and time after which agricultural cases may be accepted.

Reserved Matter. A decision requiring Trust Director, Settlor, or other special approval under the Trust Agreement, including a material change to purpose or Programs, Program Activation, removal or replacement of an operating fiduciary, material geographic expansion, activation of a restricted assistance method, a related-party matter requiring independent review, or a transition to a successor agricultural organization.

Established Governance Direction

The Initial Trustee remains responsible during this stage for protecting Trust property, approving authorized operating-development expenses, retaining the necessary managers and advisors, and ensuring that the required work is completed. The Initial Trustee may delegate defined development tasks but should not transfer fiduciary authority informally or through an ordinary service contract.

The first agricultural and financial managers are development contractors. They may investigate, analyze, design procedures, prepare recommendations, coordinate advisors, and administer approved startup work within their written scopes. Their engagement does not automatically appoint either person as a trustee, give either person access to the Trust bank account, or authorize either person to approve or fund an agricultural case.

The planned operating structure consists of an Agricultural Program Co-Trustee responsible for agricultural judgment and case administration, an Administrative and Financial Co-Trustee responsible for custody, financial verification, accounting, banking, and payment, and a Trust Director or Trust Protector responsible for purpose protection, reports, appointments, exceptional disputes, and Reserved Matters. Alternates must be designated for the two operating functions.

Routine case funding will require two functional actions: written agricultural approval and separate financial confirmation and payment. This separation does not necessarily require two physical signatures on every check or electronic payment. The banking arrangement should allow one properly authorized financial fiduciary or alternate to execute a payment after the required agricultural approval and financial checks are documented.

The Initial Trustee may later leave the Trustee office and accept appointment as Trust Director or Trust Protector if counsel determines that structure is legally appropriate. The retained office should not be used for routine case approvals or ordinary payments. It is intended for oversight, corrective action, appointments and removals, dispute resolution, reports, and matters expressly reserved by the Trust Agreement or transition documents.

Funding and privacy direction

DH Group Holdings LLC, an existing Wyoming limited liability company, is the Trust's Settlor and initial funding source. Operating-development expenses and later agricultural assistance are paid from Trust property under the applicable authority and controls. DH Group Holdings LLC may authorize documented replenishments, but an anticipated replenishment is not available Trust cash until it has been transferred, accepted, and recorded. The funding role does not itself create routine case, bank, or payment authority.

One Trust bank account may remain sufficient during the Initial Operating Phase if the accounting records separately identify formation and development expense, ordinary administration, approved case commitments and payments, the available program reserve, recoveries, and the self-funded risk reserve. A separate accounting category does not require a separate bank account unless the bank, CPA, counsel, or an approved operating need requires one.

Personal identities, exact funding amounts, account information, credentials, compensation details, background records, and other sensitive information should remain in controlled confidential schedules and files rather than this general working plan. Information should be disclosed privately when required by law, the bank, a professional engagement, or prudent administration.

Requirements Before Operating Development Begins

The following formation-stage conditions should be confirmed before operating-development contracts or program-development work are authorized:

[ ] The Trust Agreement has been executed and the Trust's legal existence and governing structure have been confirmed by Oklahoma counsel.

[ ] The Initial Trustee has accepted office and the Formation Completion Record has been signed.

[ ] The Trust bank account is open in the correct legal name and the approved initial funding has settled.

[ ] Opening accounting records, the first bank reconciliation, tax records, and the formation-records index are complete or assigned under a documented nonblocking exception.

[ ] A confidential operating-development budget identifies available startup funds, expected professional and contractor costs, uncommitted operating cash, and the amount reserved for later agricultural cases.

[ ] Counsel has confirmed the Initial Trustee's authority to retain and compensate the development contractors and advisors.

Ordered Operating Development Sequence

The following steps should be completed in order unless counsel, the CPA, the bank, or a documented operating need requires a different sequence. Work may overlap, but no step should be treated as complete until its required output exists in the Trust records.

1. Authorize the operating-development scope and budget

Responsible: Initial Trustee, with counsel and CPA review.

Action: Approve the development objectives, contractor budget, professional-services budget, permitted startup purchases, expense-approval process, available program reserve, and confidential reporting schedule. Distinguish operating-development funds from capital reserved for agricultural cases.

Required output: Operating Development Authorization and Confidential Startup Budget Record.

2. Retain the agricultural program-development manager

Responsible: Initial Trustee, with counsel and knowledgeable agricultural references.

Action: Select an experienced agricultural and business manager who can diagnose operating problems, assess viability, determine when specialists are needed, understand available agricultural resources, and work effectively with producers, local advisors, vendors, and financial professionals. Complete reference, conflict, availability, and background review appropriate to the role before engagement.

Required output: Signed agricultural program-development agreement and initial work plan.

3. Retain the financial and administrative development manager

Responsible: Initial Trustee, coordinated with counsel and the CPA.

Action: Select a person experienced in controlled disbursements, budgeting, accounting workflow, records, vendor documentation, fraud controls, and management reporting. Agricultural finance or commercial operating experience is useful, but it does not replace the required financial-control experience.

Required output: Signed financial and administrative development agreement and initial work plan.

4. Develop the common operating policies

Responsible: Agricultural and financial managers, with counsel, CPA, banker, and specialists as needed; Initial Trustee reviews the completed package.

Action: Prepare the rules that apply to every case, including access and intake, eligibility, verified need, viability, assistance forms, conflicts, confidentiality, evaluation, specialist use, approval, financial confirmation, payment, monitoring, changes, completion, recoveries, records, declinations, and exceptions.

Required output: Common Program Policies and Controls package.

5. Develop the three program-specific policy sections

Responsible: Agricultural manager leads; financial manager confirms payment and documentation treatment; counsel and CPA review matters within their disciplines.

Action: Define the different triggering conditions, evidence, permitted assistance, urgency, limits, monitoring, completion standards, and recovery considerations for each of the three programs. Avoid repeating the common policies in each section.

Required output: Three program-specific policy sections cross-referenced to the common policies.

6. Build the specialist, vendor, and resource network

Responsible: Agricultural manager, supported by the financial manager and counsel.

Action: Identify the providers and resources likely to be needed in Pontotoc County and surrounding service areas. Establish qualification, licensing, insurance or risk, conflict, estimate, change-order, invoice, payment, performance, and record requirements. A provider need not be placed under a standing contract before an actual need exists.

Required output: Controlled provider and resource directory with onboarding requirements.

7. Establish the administrative and field-support system

Responsible: Financial and administrative manager, with the agricultural manager, banker, CPA, counsel, and technology support as needed.

Action: Establish the dedicated phone, email, mailing, secure records, accounting, payment, document-storage, field-visit, travel, communication, and recovery arrangements needed to administer cases. Preserve phone, paper, and in-person access; technology should support the work rather than become a barrier to older or less-digital agricultural operators.

Required output: Operational communications, records, accounting, payment, and field-support system.

8. Test the proposed system with simulated cases

Responsible: Agricultural and financial managers, observed by the Initial Trustee and reviewed by the appropriate advisors.

Action: Run representative cases through intake, evaluation, specialist coordination, approval, financial confirmation, payment preparation, monitoring, change control, completion, and closure. Test conflicts, fraud protections, unavailable fiduciaries, emergency action, later reimbursements, and payment-instruction changes.

Required output: Written readiness-test record identifying passed controls, corrections, responsible persons, and completion dates.

9. Vet and appoint the operating fiduciaries and alternates

Responsible: Initial Trustee and DH Group Holdings LLC under the appointment authority confirmed by counsel.

Action: Evaluate the managers and any other candidates separately for the Agricultural Program Co-Trustee, Administrative and Financial Co-Trustee, Trust Director or Trust Protector, and alternate offices. Experience as a development contractor may be considered, but appointment requires a separate decision, defined fiduciary duties, conflict review, compensation approval, written acceptance, and banking acceptability where applicable.

Required output: Executed appointments, acceptances, compensation records, conflict disclosures, and authority schedule.

10. Convert and test banking, payment, and record authority

Responsible: Initial Trustee, banker, Administrative and Financial Co-Trustee, approved alternate, CPA, and counsel.

Action: Remove superseded access; establish the operating and backup authorities; test multifactor authentication, transaction alerts, check, ACH, wire, reconciliation, and continuity controls; and transfer the authoritative records and pending obligations. No former or suspended fiduciary should retain access.

Required output: Updated bank records, access report, tested payment-control record, and fiduciary handoff record.

11. Approve the operating package and activate the Programs

Responsible: Required signatories under the Trust Agreement and counsel-approved transition documents.

Action: Confirm that all blocking issues have been resolved, approve the identified policy and form versions, state the available program reserve and initial service area, complete the Initial Trustee transition, and execute the written Program Activation action. Applications or referrals should not be invited before the effective time stated in that action.

Required output: Executed governance-transition and Program Activation record.

Agricultural Program-Development Manager

This person is the principal agricultural and business-development contractor. The role is broader than inspecting damage or processing an application. The manager must determine what is actually preventing or threatening continued operation, whether the operation is reasonably capable of continuing, which intervention is likely to work, and whether existing resources should be used before or together with Trust funding.

Minimum selection standards

- **Direct experience.** Substantial practical experience managing, financing, advising, repairing, supplying, or restoring farms, ranches, livestock or crop operations, or related agricultural businesses.
- **Business judgment.** Ability to understand operating cash flow, labor, equipment, facilities, production schedules, suppliers, insurance, credit, and the consequences of delay.
- **Diagnostic ability.** Demonstrated ability to distinguish the stated request from the underlying problem and to identify when a veterinarian, engineer, mechanic, agronomist, accountant, attorney, insurance professional, lender, payroll specialist, or other specialist is needed.
- **Resource knowledge.** Working knowledge of agricultural insurance, lenders, government agricultural programs, manufacturers, dealers, educational resources, relief organizations, and local provider networks.
- **Communication.** Ability to work respectfully with operators who prefer telephone, paper, or face-to-face communication and with longstanding local accountants, bankers, attorneys, veterinarians, suppliers, and other trusted advisors.
- **Documentation and independence.** Ability to make clear written recommendations, disclose conflicts, protect confidential information, and separate agricultural judgment from personal or vendor interests.

Development responsibilities

- Design the intake, agricultural evaluation, viability, specialist-use, monitoring, completion-verification, and case-closure processes.
- Define the evidence needed for ordinary, urgent, and emergency cases without imposing unnecessary application burden.
- Develop the three program-specific policy sections and recommend ordinary approval limits, exception triggers, and Reserved Matters.
- Identify and evaluate the initial provider and resource network for Pontotoc County and nearby areas.
- Coordinate simulated cases and document corrections required before Program Activation.
- Prepare recommendations for future agricultural staffing, geographic expansion, and contractor needs without creating positions before they are justified.

Authority limits during development

Before formal appointment to a fiduciary office, the agricultural manager may not select an operation to receive assistance, approve an agricultural case, bind the Trust to assistance, sign on the Trust bank account, promise payment, or represent that an applicant will receive funding. The manager may incur only the development expenses expressly authorized in the contractor agreement or a later written approval.

Financial and Administrative Development Manager

This person converts approved agricultural decisions into a controllable financial and administrative process. The role is not to second-guess sound agricultural judgment merely because a different business choice could have been made. It is to confirm that the Trust has authority, available funds, reliable documentation, a verified recipient and payment route, satisfied conditions, and a record that can be reconciled and reviewed.

Minimum selection standards

- **Controlled disbursements.** Experience with commercial payments, account access, invoice support, payee verification, ACH and wire controls, fraud prevention, and reconciliation.
- **Accounting and reporting.** Ability to coordinate with the CPA or bookkeeper on budgets, reserves, commitments, project accounting, recoveries, tax records, document retention, and management reports.
- **Administrative design.** Ability to build a simple case-record and approval system that supports phone, paper, in-person, and electronic activity without unnecessary technology or permanent staffing.
- **Commercial understanding.** Ability to distinguish a business payment from unrestricted personal assistance and to document payments to vendors, qualifying agricultural operations, sole proprietorships, payroll or benefit administrators, insurers, lenders, and other permitted recipients.
- **Independence and continuity.** Ability to identify conflicts, protect account credentials, maintain recoverable records, train an alternate, and continue previously approved obligations during a temporary absence under written authority.

Development responsibilities

- Develop the operating budget, program-reserve reporting, commitment tracking, payment documentation, payee onboarding, reimbursement and recovery records, reconciliation, and reporting processes.
- Coordinate the bank's operating-authority, backup-access, fraud-control, transaction-alert, and payment-service requirements.
- Develop the case file structure, version control, records index, secure access, backup, retention, and recovery process.
- Define routine expense approval, contractor invoice, travel reimbursement, vendor change-order, emergency payment, and financial exception procedures.
- Participate in simulated cases and verify that an approved case can be paid and accounted for without relying on the Initial Trustee after transition.

Authority limits during development

Before formal fiduciary appointment or a separate limited written delegation, the financial manager has no bank access and may not release Trust funds, sign contracts for the Trust, approve personal expenses, or make an agricultural eligibility decision. Any limited startup-payment function must state the account, amount or limit, duration, records required, supervising fiduciary, and method for ending access.

Contractor Selection and Engagement Controls

The Trust should use a documented but practical selection process. A large public search or formal procurement department is not required. Candidate sources may include experienced producers and agricultural managers; farm and ranch management firms; agricultural lenders and insurers; veterinarians; equipment, feed, seed, and supply businesses; producer and commodity organizations; extension and agricultural education contacts; accountants; attorneys; controllers; trust administrators; and respected local business leaders.

Selection record

[ ] Role description and required experience approved before interviews begin.

[ ] Candidate resume or experience record, references, disclosed relationships, availability, compensation proposal, and service territory.

[ ] Interview notes addressing practical judgment, sample problems, communication with operators, documentation, conflicts, and willingness to work within limited authority.

[ ] Background, license, credential, insurance, and public-record checks appropriate to the authority and information the person will hold.

[ ] Written selection decision explaining why the chosen person is suitable and identifying any condition that must be satisfied before work begins.

Required contractor-agreement terms

- **Scope and deliverables.** Identify the actual work products, milestone-review process, completion conditions, reporting line, and matters outside the engagement.
- **Authority.** State that the contractor cannot bind the Trust, promise case funding, release capital, open accounts, hire others, or make public statements except under a specific written authority.
- **Compensation.** Use an hourly, retainer, milestone, fixed-project, or blended structure suited to the work. Do not base compensation on the amount of Trust funding approved or paid. Preapproval and documentation requirements for travel and other expenses must be stated.
- **Separate fiduciary compensation.** If the contractor is later appointed to a fiduciary office, the appointment and fiduciary compensation must be separately approved and documented. The service contract alone does not create the office.
- **Conflicts and related parties.** Require continuing disclosure of financial, family, ownership, employment, referral, and vendor interests. A contractor should not select or approve an affiliated provider without the required independent review.
- **Confidentiality and records.** Define permitted access, secure handling, ownership of work product, return of records, incident reporting, retention, and destruction. Trust records should remain accessible if the contractor leaves.
- **Delegation and subcontractors.** Require approval before using a subcontractor and impose the same confidentiality, conflict, record, insurance, and authority limits.
- **Risk and insurance.** State any required coverage or approved self-funded risk treatment, field-safety expectations, vehicle and travel responsibility, indemnity or liability terms, and prohibited personal guarantees as counsel advises.
- **Term and termination.** Use milestone or review-based continuation, allow termination under defined notice or immediate-cause conditions, and require orderly transfer of records, credentials, property, and unfinished work.

Professional Advisors and On-Demand Specialists

The two development managers do not replace the Trust's attorney, CPA, banker, or other licensed professionals. They should identify when professional advice is required and present the issue clearly. The Trust should retain specialists only when a defined need exists rather than building a permanent advisory group at startup.

During operating development, the Initial Trustee signs or approves a specialist engagement unless a written delegation states who may engage the specialist, for what work, within what cost limit, and with what reporting and record requirements. After Program Activation, the operating fiduciary assigned the subject matter may retain a specialist within the approved policy, budget, and authority schedule, with financial confirmation where the engagement commits Trust funds.

- **Oklahoma counsel.** Review contractor agreements, fiduciary appointments, delegated authority, conflicts, confidentiality, liability, insurance, assistance agreements, employment-related support, recoverable funding, and Program Activation.
- **CPA and bookkeeper.** Establish accounting treatment, budgets, commitment tracking, tax records, reimbursement and recovery treatment, reconciliation, reporting, and contractor-versus-employee review with counsel.
- **Banker.** Confirm account titles, signers, payment services, fraud controls, backup access, transaction limits, and the transition from formation-stage to operating authority.
- **Insurance or risk advisor, when needed.** Advise whether particular field, contractor, vehicle, data, property, professional, or fiduciary exposures should be insured, contractually allocated, limited, avoided, or supported by the Trust's self-funded risk reserve.
- **Case and operating specialists.** May include veterinarians, engineers, mechanics, agronomists, construction and repair professionals, equipment specialists, appraisers, inspectors, payroll and benefits professionals, information-technology providers, transportation providers, lenders, insurance specialists, and other qualified persons required by a specific matter.

Required Program Policy Package

The operating package should contain one set of common policies and a concise policy section for each program. This avoids repeating the same financial, confidentiality, conflict, and record rules three times while still preserving the different purposes and urgency of the programs.

Common policies

- Who may inquire or refer a matter and how intake may occur by telephone, paper, in person, through a trusted advisor, or electronically.
- The meaning of a qualifying agricultural operation, verified need, reasonable viability, material operating effect, available resources, and complete-enough information.
- Permitted assistance forms, recipients and payment routes, ordinary approval limits, exception triggers, and assistance methods that remain inactive.
- Funding priorities, treatment of simultaneous or competing needs, partial or staged assistance, waiting or deferred matters, and the rule that an application or accepted case creates no entitlement to Trust funds.
- Confidentiality, consent, information verification, conflicts, related parties, specialist use, inspections, estimates, and communication with existing advisors.
- Agricultural approval, financial confirmation, payment documentation, emergency action, change orders, monitoring, completion verification, misrepresentation or misuse, suspension or termination, recoveries, refunds, unused funds, case closure, outcome reporting, and record retention.
- How a declined, deferred, incomplete, withdrawn, suspended, or terminated matter is recorded and whether a limited internal reconsideration is available without creating an entitlement to assistance.

Program-specific requirements

Essential Operations Assistance. Define the operating problem, likely consequence if uncorrected, evidence that the operation is otherwise reasonably viable, proposed correction, estimated cost, required timing, provider selection, and completion standard. The policy should favor a prompt, proportionate correction before the problem causes a major disruption.

Agricultural Emergency & Business Disruption Recovery. Define the event, actual interruption or material reduction, immediate stabilization needs, restoration plan, expected recovery period, workforce-preservation need, payroll and benefits evidence, temporary operating arrangements, emergency authority, reporting frequency, and conditions for ending temporary support.

Agricultural Resource & Gap Assistance. Define the sound agricultural need, resources investigated, insurance or lender position, applicable federal, state, local, or tribal agricultural programs, manufacturers or suppliers contacted, expected timing, remaining gap, and why supplemental, bridge, replacement, gap, or sole-source Trust funding is appropriate. The policy should not require an outside resource when none is suitable or timely.

Case Intake and Evaluation Framework

The final procedure should be simple enough to obtain help quickly while producing a record that supports responsible use of Trust funds. It should not force an operator to use a public portal or complete a complex digital application. A local coordinator may receive information by telephone, paper, or in person and enter it into the Trust's internal system. Existing accountants, bankers, attorneys, veterinarians, insurance agents, and other trusted advisors may participate with the operation's permission. The approved procedure will assign the responsible role and required record for each stage below; those assignments should not be repeated in every case instruction.

1. Inquiry and referral

Record the operation, contact method, person making the inquiry, general problem, location, urgency, immediate safety or animal-welfare issue, and preferred communication method. An inquiry is not an application or funding commitment.

2. Preliminary screen

Determine whether the matter appears agricultural, fits one or more program purposes, is within the current service area or an approved exception, and contains enough information for evaluation. Route emergencies immediately under the approved emergency procedure.

3. Evaluation and verification

Obtain only the information reasonably needed to understand the operation, verified need, viability, timing, available resources, estimated cost, proposed recipient or payment route, and conflicts. Use site visits, records, estimates, and specialists in proportion to the matter.

4. Resource coordination

Identify applicable insurance, lender, government agricultural program, manufacturer, supplier, educational, foundation, relief, or other assistance. Record what is available, unavailable, delayed, insufficient, or inappropriate.

5. Agricultural recommendation

State the actual problem, recommended assistance, amount or maximum commitment, purpose, payee or route, conditions, monitoring, completion evidence, and any refund, reimbursement, or recovery expectation. A contractor recommendation does not commit the Trust.

6. Agricultural approval

After Program Activation, the Agricultural Program Co-Trustee or authorized alternate approves, declines, defers, or returns the matter for additional information under the approved policy and authority limits.

7. Financial confirmation and payment

The Administrative and Financial Co-Trustee or authorized alternate confirms authority, funds, documentation, recipient, payment instructions, conflicts, conditions, and accounting treatment before releasing an approved payment.

8. Monitoring and changes

Track performance, milestones, invoices, changes, additional needs, unused funds, expected reimbursements, and any condition requiring suspension, reapproval, or Reserved Matter review.

9. Completion and closure

Verify completion and operational result, reconcile payments, collect required records, address refunds or recoveries, document unresolved obligations, and close the case with a concise outcome record.

Payment, Recipient, and Recovery Principles

The Trust should use the simplest lawful and properly documented payment route suited to the approved need. Direct payment to a repair firm, supplier, manufacturer, veterinarian, specialist, landlord, utility, insurer, lender, payroll or benefit administrator, government entity, or other provider will often provide the clearest control. A documented payment may also be made to a qualifying agricultural operation when that route is appropriate to the approved business purpose.

The Trust is not intended to make unrestricted personal cash payments. A sole proprietorship may require use of the proprietor's legal name or documented trade name, but the file must establish the agricultural business purpose, conditions, permitted use, and accounting treatment. The payment should not be described or recorded as unrestricted personal assistance merely because the operation lacks a separate entity.

The procedure should address advance deposits, milestone payments, emergency purchases, reimbursement of a verified eligible expense, payroll or benefit support, payment to a lender or insurer, credits, returned merchandise, unused funds, later insurance or government proceeds, duplicate recovery, and amounts legally payable back to the Trust. Recoverable or repayable assistance requires a signed agreement and professional review appropriate to the terms.

Lending, secured capital, guarantees, equity, acquisitions, and joint ventures remain inactive unless separately authorized as Reserved Matters after the required review.

Operating and Administrative Support Needs

The Trust may pay the reasonable operating resources needed to develop and administer the Programs. These are Trust operating expenses rather than agricultural case assistance and should be budgeted, approved, invoiced, paid, and recorded separately from case commitments.

- **Communications.** Dedicated telephone number, email address, mailing address, secure document exchange, voicemail coverage, and simple referral information. Paper and in-person options should remain available.
- **Information technology and records.** Secure devices or controlled access, multifactor authentication, document scanning, file indexing, backup, recovery control, basic case tracking, accounting integration, and incident response. A custom software system or public portal is not required initially.
- **Workspace and supplies.** Temporary or shared workspace, secure storage, printing, postage, office supplies, inspection forms, field documentation equipment, and meeting space only as actual work requires.
- **Travel and transportation.** Mileage, rentals, delivery, lodging, or other documented costs reasonably needed for site visits, provider coordination, inspections, and operating development. A Trust vehicle should not be acquired merely for appearance or convenience.
- **Professional and contractor support.** Legal, accounting, banking, bookkeeping, technology, records, payroll, benefits, insurance, communications, inspection, and other services required by the approved work.
- **Vendor accounts.** The Trust may use a vendor that also serves another organization, but the Trust's account, contract, invoice, approval, payment, and accounting record must identify the Trust's own obligation. Combined billing accounts are not part of the initial structure.
- **Risk treatment.** The Trust may maintain a self-funded risk reserve and may obtain external insurance when required by law, contract, a financial institution, or a documented exposure assessment. The reserve is not an insurance policy and does not replace required coverage.

Conflicts, Confidentiality, and Continuity

Every contractor, fiduciary, alternate, specialist, and material service provider should disclose actual or reasonably apparent financial, family, ownership, employment, referral, or vendor interests affecting a Trust decision. A person should not approve that person's own compensation, expense, affiliated provider, or related-party transaction. Counsel should establish the disinterested or special-fiduciary process for matters that cannot be resolved through ordinary recusal.

Access to an agricultural operation's ownership, finances, insurance, employment, production, property, health, or other sensitive information should be limited to those who reasonably need it. The Trust should disclose information to banks, tax authorities, governmental agricultural programs, courts, professional advisors, specialists, providers, and resource organizations only when authorized, required, or reasonably necessary to administer the matter.

The operating package must address temporary absence, illness, incapacity, disqualification, resignation, suspension, removal, and vacancy. Previously approved payments, payroll-preservation commitments, necessary protective expenses, and other binding obligations should be capable of continuing under documented backup authority. No alternate should exercise authority before the triggering condition and written activation required by the final governance documents.

Readiness Testing

Before Program Activation, the managers should run simulated cases without contacting a real applicant as though funding had been approved. Each test should create the same records that a real case would require and should end with a written result, identified weakness, corrective action, responsible person, and retest where necessary.

[ ] An essential equipment or facility failure that can be corrected before operations are interrupted.

[ ] A serious disruption requiring restoration work and limited temporary payroll and existing-benefit support.

[ ] A sound need involving delayed or insufficient insurance, lender, manufacturer, or government agricultural-program assistance.

[ ] A payment to a sole proprietorship or qualifying operation when direct vendor payment is not the appropriate route.

[ ] A new or changed ACH or wire instruction that must be independently verified before payment.

[ ] A provider change order or cost overrun requiring additional agricultural and financial review.

[ ] A related-party or affiliated-vendor conflict requiring independent handling.

[ ] Temporary unavailability or suspension of one operating fiduciary and activation of an alternate.

[ ] An emergency protective payment needed while a full case decision is pending.

[ ] A later reimbursement, refund, unused balance, or duplicate recovery payable to the Trust.

[ ] Loss of access to a contractor's device or records and restoration from the Trust-controlled record system.

Program Activation Standard

The first agricultural case may be accepted only after the following conditions are complete and identified in the Program Activation record:

[ ] The common policies and the three program-specific sections are approved by version and effective date.

[ ] The intake, evaluation, specialist, agricultural approval, financial confirmation, payment, monitoring, completion, recovery, and closure forms are ready for use.

[ ] The initial provider and resource directory is sufficient for the approved service area, and the onboarding process is operational.

[ ] The operating budget, available program reserve, commitment-tracking method, compensation, and insurance or risk decisions are documented.

[ ] The Agricultural Program Co-Trustee, Administrative and Financial Co-Trustee, Trust Director or Trust Protector, and required alternates have accepted office under written authority documents.

[ ] The dispute, conflict, temporary absence, emergency, resignation, suspension, removal, and replacement procedures are effective.

[ ] Banking, electronic access, payment, reconciliation, reporting, records, backup, and recovery controls have been converted and tested.

[ ] Every blocking issue from readiness testing has been corrected and retested.

[ ] The Initial Trustee's transition and the exact effective time of the new offices are documented.

[ ] The Program Activation action identifies the activated Programs, initial geography, approved policy versions, available reserve reference, and effective date and time.

Items That May Be Developed Later

The Initial Operating Phase should not be delayed for infrastructure that is not necessary to handle the first cases responsibly. The following matters may wait until actual volume, geography, risk, or operating experience justifies them:

- Permanent employees, a human-resources department, or a separate operating LLC created solely to hire contractors.
- Permanent county offices, a headquarters, warehouse, vehicle fleet, or full-time information-technology staff.

- A public application portal, custom case-management platform, mobile application, or participant self-service requirement.
- Statewide expansion, regional offices, or expansion outside Oklahoma.
- A standing contract with every possible specialist, provider, manufacturer, lender, or resource organization.
- A separate shared-expense trust or combined billing system for this Trust and another organization.
- Loans, secured or recoverable capital programs, guarantees, equity, acquisitions, or joint ventures not separately activated after professional review.
- The legal and operating integration of the Programs into the future FRRA structure.

Companion Operating-Development Documents

This plan establishes the sequence and required results. The following two companion documents should be prepared next without duplicating this plan:

Contractor Roles and Engagement Package. Contains the detailed role descriptions, candidate sourcing and interview materials, selection record, proposed compensation alternatives, contract requirements, conflict and confidentiality forms, deliverable schedule, expense rules, and evaluation process for the agricultural and financial managers and on-demand specialists.

Program Policies, Procedures, and Forms Manual. Contains the approved common policies, three program-specific sections, authority and exception schedules, case procedures, payment and records controls, provider requirements, and the forms used from inquiry through closure. It should be developed with the retained agricultural and financial managers and approved before Program Activation.

Immediate Next Action

After the Trust is formed, funded, and the Formation Completion Record is signed, the Initial Trustee should approve the operating-development scope and budget and begin the selection of the agricultural program-development manager and financial and administrative development manager. The Contractor Roles and Engagement Package should be completed before either search begins so candidates are evaluated against the same defined responsibilities and authority limits.