

curaleaf

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- B Location and Site Plan
- C Proposed Business Plan

Volume II
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- C Business Plan - Appendix

Volume IV
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Curaleaf LLC
FOIA Exemptions

Exemptions From Disclosure Under The Freedom Of Information Act

The following portions of the application are exempt from disclosure under the Freedom of Information Act:

A. Exempt pursuant to C.G.S. Section 1-210(b)(5)(A)

Business Plan and it's attached appendices: Section C

Marketing Plan: Section D

Research Plan: Section I3

The foregoing are exempt pursuant to C.G.S. Section 1-210(b)(5)(A) since they contain trade secrets as therein defined. Specifically, these documents contain programs, methods of growing marijuana for palliative purposes, cost data, intellectual property, SOPS and manuals that derive independent economic value, based on years of medical experience, training and research that are not readily ascertainable by proper means to other persons, both legitimate business competitors and users of illicit drugs who do not have such expertise or experience, and who can obtain economic value from their disclosure or use. These trade secrets are the subject of efforts by the applicant that are reasonable under the circumstances to maintain secrecy.

B. Exempt pursuant to C.G.S. Section 1-210(b)(8) and (10)

Personal Information: Section A1

Financial Information: Sections A1 & A3

Business Transactions: Section A1 #34

Compensation Agreements: Section E3

Tax returns: Accompanying Boxes Labeled "Curaleaf Backer Taxes"

The financial information is exempt since these documents include statements of personal worth and personal financial data of the individual backers or Curaleaf LLC members required by the Department of Consumer Protection in its role as a licensing agency and which is only being provided to the Department of Consumer Protection to establish the applicant's qualification for the license.

Tax returns are also specifically exempted from disclosure pursuant to C.G. S. Section 1-210(b)(10).

Revealing this information would give other competitors inside information about the financial condition of the individuals that they could seek to use to their advantage for purposes other than the reasonable inquiry made by the department of Consumer protection to verify the financial condition of Curaleaf LLC.



Volume I
Sections A-C

A	Business Information of Applicant
B	Location and Site Plan
C	Proposed Business Plan



Medical Marijuana Program

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Appendix A Producer License Information Form

Section A: Business Information						
1. Applicant business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other: _____
2. Legal Name of Applicant: CURALEAF, LLC						
3. Trade Name of Applicant: curaleaf						
4. Applicant's Business Address: 145 Doubling Road						
5. City: Greenwich				6. State: CT	7. Zip Code: 06830	
8. Daytime Telephone Number: (860) 620-3947			9. E-mail Address: april@curaleaf.com			
10. Applicant's Mailing Address (if different than business address): 13 East St					11. City: Collinsville	
12. State: CT	13. Zip Code: 06032		14. Daytime Telephone Number: [REDACTED]		15. Fax Number: (866) 409-2915	
Section B: Contact Information						
All communications from the department regarding this application will be sent to your primary contact and alternate contact, if one is designated. We will assume that you receive all communications sent to your designated contact(s) and it will be your responsibility to notify us if any of your contact information changes.						
16. Name of Primary Contact: Eileen Konieczny				17. Primary Contact Title: Chief Medical Officer		
18. Primary Contact E-mail Address: Eileen@curaleaf.com				19. Primary Contact Telephone Number: [REDACTED]		
20. OPTIONAL - Name of Alternate Contact: April Arrasate				21. Alternate Contact Title: Chief Operating Officer		
22. Alternate Contact E-mail Address: april@curaleaf.com				23. Alternate Contact Telephone Number: [REDACTED]		
Section C: Formation/Incorporation Information						
24. Date of Formation/Incorporation: 10/24/2013			25. Place of Formation/Incorporation: Commerical Recording Division,			
26. Registered with the Connecticut Secretary of State: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			27. Sale and Use Tax Permit Number: 60346111 Provide a copy of your Sale and Use Tax permit with your application.			

B 2308903

STATE OF CONNECTICUT

OFFICIAL RECEIPT
 CO-99 REV. 8/90
 (Stock No. 6938-118-01)
 Printed on Recycled or Recovered Paper

RECEIVED FROM Curaleaf LLC	DATE OF RECEIPT 11/08/13	THE SUM OF <input type="checkbox"/> Cash <input checked="" type="checkbox"/> check \$ 100.00
FOR TID# 60346111 BOT, SAT + WTH	RECEIVED BY 	
AGENCY NAME Department of Revenue Services TEMPORARY PERMIT		



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Section D: Proposed Production Facility Information

28. Proposed Production Facility Address: 100 Grist Mill Road		29. City: Simsbury	
30. State: CT	31. Zip Code: 06070	32. Telephone Number: (860) 408-7000	33. Fax Number:
34. Own or Lease Property: <input type="checkbox"/> Own <input checked="" type="checkbox"/> Lease Provide a copy of the lease, deed or other documents evidencing the right to occupy if you are awarded a license.		35. Name of Property Owner: Grist Mill Partners, LLC	

Section E: Business Association Information

36. Are you associated with any dispensary facility license applicant or other producer license applicant? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, provide the name of all applicants with whom you are associated. Attach additional pages if necessary.	
37. Applicant Name: Apothecary 241, LLC	38. Applicant Type: <input checked="" type="checkbox"/> Dispensary Facility <input type="checkbox"/> Producer
39. Applicant Name:	40. Applicant Type: <input type="checkbox"/> Dispensary Facility <input type="checkbox"/> Producer

Section F: Escrow Account, Letter of Credit or Surety Bond

41. Establishment of an escrow account, letter of credit or surety bond shall be required prior to issuance of a producer license. Provide the following information and **submit documentation evidencing** an ability to establish and maintain an escrow account, letter of credit or surety bond in the amount of two million dollars (\$2,000,000.00), if you are awarded a producer license.

Review the Terms and Conditions of this RFA to ensure that the terms of your escrow account, letter of credit or surety bond will be acceptable.

<input checked="" type="checkbox"/> Escrow Account	<input type="checkbox"/> Letter of Credit	<input type="checkbox"/> Surety Bond
----------------------------------------------------	-------------------------------------------	--------------------------------------

42. Financial Institution/Surety Company Name:
[REDACTED]

43. Address: [REDACTED]

44. City: [REDACTED] 45. State: [REDACTED] 46. Zip Code: [REDACTED]

47. Telephone Number: [REDACTED] 48. Fax Number: [REDACTED] 49. E-mail Address: [REDACTED]

Section G: Laboratory (This is only required if you have already selected a laboratory)

50. Laboratory Name:		51. Laboratory License No.	
52. Address:			
53. City:		54. State: CT	55. Zip Code:
56. Telephone Number:	57. Fax Number:	58. E-mail Address:	

November 5, 2013

Mr. Daniel E. Carpenter
Grist Mill Partners, LLC
100 Grist Mill Road
Simsbury, CT 06070

Re: **Term Sheet By And Between Grist Mill Partners LLC a Delaware LLC--
Landlord ("GMP") and curaleaf LLC a Connecticut LLC--Tenant
("CuraLeaf")**

Dear Mr. Carpenter:

The following business terms describe generally the terms and conditions of the proposed lease with option to purchase the real property and improvements of 100 Grist Mill Road, Simsbury, Connecticut described in a deed recorded at Vol. 743 Page 390 of the Simsbury Land Records. If you agree to these terms, please countersign below and return a copy to me by November 8, 2013.

CuraLeaf is seeking the lease for purposes of producing medical marijuana. As a precondition to entry into the lease with option to purchase, CuraLeaf must seek and obtain a Producer License from the State of Connecticut's Department of Consumer Protection.

As part of the application process, GMP agrees to certify to the State Department of Consumer Protection that it consents to CuraLeaf operating a production facility on the premises as provided in the form attached to this letter.

Provided the foregoing precondition is met, the parties will enter into a lease with option to purchase under the following terms and conditions:

1. The lease shall be for the entire building and the land of 100 Grist Mill Road, Simsbury, Connecticut. See Map G11 Block 103 and Lot 005-25 of the Simsbury Tax Assessor's Records and as more particularly described in Volume 743 Page 390 of the Simsbury Land Records.
2. The initial lease term shall be for five (5) years from the Rent Commencement Date. The Rent Commencement Date shall be that date when all permits and approvals to operate have been granted, and the appeal periods have expired, and the building has been fully vacated. GMP shall have a minimum of three

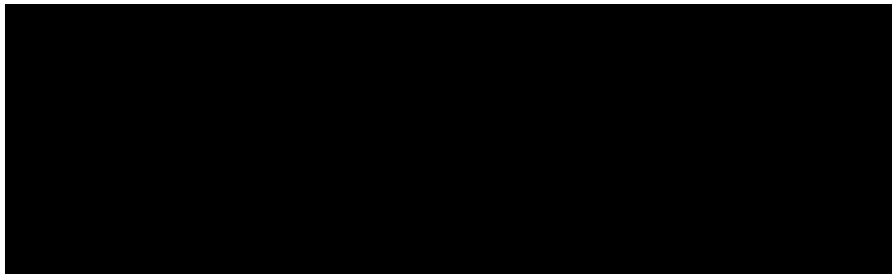
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Mr. Daniel E. Carpenter
November , 2013
Page 2

(3) months but no more than six (6) months to turn over the building and land free of all other tenants or occupants.

3. There shall be one 5-year renewal option.

4.



5. CuraLeaf shall have an exclusive option to buy the leasehold premises during the term of the Lease for the sum of [REDACTED]. This option may be exercised at any time during the term of the initial lease or renewal upon 30 days prior written notice.

6. If the option is exercised in the 24-month period immediately following the Rent Commencement Date, then GMP shall be entitled to an additional sum above the [REDACTED] purchase price equal to [REDACTED].

7. The cost of the proposed renovations to the existing building shall be borne solely by CuraLeaf. CuraLeaf shall be responsible for utilities, maintenance and repair but not for replacement of structural items such as the roof, HVAC or foundation.

8. GMP shall pay all real estate taxes as and when due.


9. The parties agree that the lease with option to purchase shall not be subordinate to any mortgage, pledge or hypothecation by GMP and it will take such measures as may be necessary to make the lease superior to any recorded pledges, mortgages, etc. as a precondition of the effectiveness of the lease with option to purchase.

Mr. Daniel E. Carpenter
November 5, 2013
Page 3

10. The parties agree that the lease with purchase option shall be construed in accordance with the laws of the State of Connecticut and shall be binding upon and inure to the benefit of GMP, CuraLeaf and their respective successors and assigns.

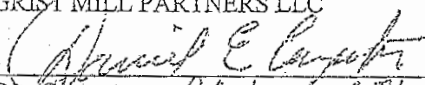
Sincerely,

CURALEAF LLC


Robert Birnbaum

AGREED & ACCEPTED THIS 6th DAY OF November, 2013
SUBJECT TO REVIEW AND APPROVAL OF LEASE
WITH OPTION TO PURCHASE


GRIST MILL PARTNERS LLC


Dan Carpenter *Chairman of its managing member*

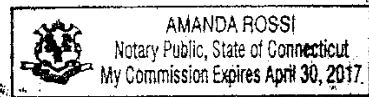
Date: November 6th 2013

STATE OF CONNECTICUT)
) ss: Simsbury
COUNTY OF HARTFORD)

On this 14th day of November, 2013, before me personally appeared Dan Carpenter, who being duly sworn, did say he is the managing member of Grist Mill Partners, LLC and executed the foregoing certification by his own free act and deed for Grist Mill Partners, LLC.



Notary Public
My Commission Expires: 4/30/17





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Section H: Proposed Production Facility Business Hours

59. State the proposed production facility's business hours for each day:

Monday	0000	to	2400	Friday	0000	to	2400
Tuesday	0000	to	2400	Saturday	0000	to	2400
Wednesday	0000	to	2400	Sunday	0000	to	2400
Thursday	0000	to	2400				

Section I: Other Business Names & Addresses

List all names under which the applicant has done business or has held itself out to the public as doing business. Do not limit your response to business operations in Connecticut. Attach additional pages if necessary.

60. Name:	61. Time Period:

List all addresses, other than those listed in response to Section A, that the applicant owns, has owned or from which it has conducted business during the previous five years and give the approximate time periods during which such locations were owned or utilized. Attach additional pages if necessary.

62. Address:	63. Time Period:

Section J: Producer Backers

Provide the following information for each producer backer. A producer backer is any person (including any legal entity) with a direct or indirect financial interest in the applicant, except it shall not include a person with an investment interest provided the interest held by such person and such person's co-workers, employees, spouse, parent or child, in the aggregate, does not exceed five per cent of the total ownership or interest rights in the applicant and such person will not participate directly or indirectly in the control, management or operation of the production facility if a license is granted.

Create additional copies of this page if necessary.
Each backer identified in response to this section must complete and sign Appendix B.

64. Name:	65. Percentage of ownership
Aaron Ford	
Sandra Soule	



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Section H: Proposed Production Facility Business Hours

59. State the proposed production facility's business hours for each day:

Monday	_____ to _____	Friday	_____ to _____
Tuesday	_____ to _____	Saturday	_____ to _____
Wednesday	_____ to _____	Sunday	_____ to _____
Thursday	_____ to _____		

Section I: Other Business Names & Addresses

List all names under which the applicant has done business or has held itself out to the public as doing business. Do not limit your response to business operations in Connecticut. Attach additional pages if necessary.

60. Name:	61. Time Period:

List all addresses, other than those listed in response to Section A, that the applicant owns, has owned or from which it has conducted business during the previous five years and give the approximate time periods during which such locations were owned or utilized. Attach additional pages if necessary.

62. Address:	63. Time Period:

Section J: Producer Backers

Provide the following information for each producer backer. A producer backer is any person (including any legal entity) with a direct or indirect financial interest in the applicant, except it shall not include a person with an investment interest provided the interest held by such person and such person's co-workers, employees, spouse, parent or child, in the aggregate, does not exceed five per cent of the total ownership or interest rights in the applicant and such person will not participate directly or indirectly in the control, management or operation of the production facility if a license is granted.

Create additional copies of this page if necessary.
 Each backer identified in response to this section must complete and sign Appendix B.

64. Name:	65. Percentage of ownership
Kyle Rusconi	
Joseph Sieghart	



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Robert Birnbaum	
Josef Sieghart	
Andrew Sieghart	

Section K: Directors, Owners, Officers and Other High-Level Employees

Provide the following information for each individual, including each producer backer, who will:

- directly or indirectly have control over, or participate in the management or operation of, the production facility; or
- who currently receives, or who reasonably can be expected to receive, within one calendar year, compensation from the applicant exceeding \$100,000.

Create additional copies of this page if necessary.

Each person identified in response to this section must complete and sign Appendix C.

66. Name (First, Middle, Last):	67. Title:	68. Role:
April Arrasate, JD	Chief Operating Officer	Operations/Compliance
Robert Birnbaum	Chief Executive Officer	Financial/Operations
Eileen Konieczny	President, Chief Visionary	Product/Education
Andrew Sieghart	Board of Directors	
Aaron Ford	Board of Directors	

Section L: Financial Statement

Set forth all expenses greater than \$10,000 incurred in connection with the establishment of your business and the sources of the funds for each. Attach additional pages if necessary. The Department may require backup documentation.

69. Expense Item:	70. Cost: \$	71. Source of Funds:
	\$	
	\$	
	\$	
	\$	
	\$	



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Section M: Security System			
Identify the companies that will provide security services for the production facility if a license is awarded. A primary and a backup security company are required. If more than two companies will provide security services, complete this section for each such additional company.			
72. Primary Security Company Name: Siemens Industry Inc., Building Technologies Division			
73. Primary Security Company Address (including Apartment or Suite #): 104 Sebeth Drive			74. City: Cromwell
75. State: CT	76. Zip Code: 06416	77. Telephone Number: (860) 754-1290	78. Fax Number: (860) 880-1018
79. E-mail Address: Donald.naiior@siemens.com			
80. Backup Security Company Name: Harris Security, LLC			
81. Backup Security Company Address (including Apartment or Suite #): P.O. Box 838			82. City: Bristol
83. State: CT	84. Zip Code: 06010	85. Telephone Number: (860) 583-6637	86. Fax Number:
87. E-mail Address: hsllc4u@sbsglobal.net			
88. Attach a detailed description of the security plan to be offered by the security companies. Be sure to include a discussion of each of the required elements set forth in Section 21a-408-62 of the Regulations of Connecticut State Agencies.			

Section N: Legal Proceedings
89. Has the applicant ever had any petition filed by or against it, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement providing the details of such proceeding or petition.
90. Has the applicant ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.
91. Is the applicant a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.
92. Has the applicant ever had any fines or other penalties over \$10,000 assessed by any regulatory agency? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement providing the details of such fines or penalties.

*#88 Security Plan can be found in Section C as an attachment to our business plan



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Section O: Criminal Actions

93. Has the applicant ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or are any such charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section P: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating the applicant's suitability to participate in the medical marijuana program. As the duly authorized representative of the applicant, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

94. Signature:

95. Date Signed:

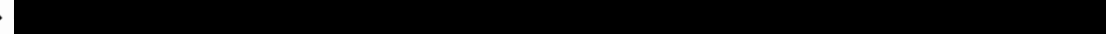


I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes. As the duly authorized representative of the applicant, I hereby make the above certifications on behalf of the applicant.

96. Signature:

97. Date Signed:





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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other:
2. Legal Name of Backer: Doubling Road Holdings LLC						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): 145 Doubling Road						
5. City: Greenwich				6. State: CT	7. Zip Code: 06830	
8. Daytime Telephone Number:		9. Fax Number:			10. E-mail Address:	

Section B: Backer Members	
<p>If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.</p> <p>Each member of a backer identified in response to this section must complete either:</p> <ul style="list-style-type: none"> Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership
please see attached additional page	

Backer Members
Doubling Road Holdings LLC and Curaleaf LLC

percent

Kyle Rusconi
Aaron Ford
Jack Rubin
Robert Birnbaum
Sandra Soule
Josef Sieghart
Andrew Sieghart



100.00%



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Section C: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.

13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number:
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?
 Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?
 Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?
 Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?
 Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature: *[Handwritten Signature]*

27. Date Signed: *[Handwritten Date]*

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature: *[Handwritten Signature]*

29. Date Signed: *[Handwritten Date]*



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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other:
2. Legal Name of Backer: Jack Lawrence Rubin						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number:			10. E-mail Address: [REDACTED]	

Section B: Backer Members	
If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.	
Each member of a backer identified in response to this section must complete either: <ul style="list-style-type: none"> • Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or • Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership



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Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.

13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number:
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature:



[Redacted Signature]

27. Date Signed:

November 9, 2013

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature:



[Redacted Signature]

29. Date Signed:

November 9, 2013



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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other:
2. Legal Name of Backer: Aaron Wesley Ford						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]				6. State: [REDACTED]	7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number:			10. E-mail Address: [REDACTED]	

Section B: Backer Members	
<p>If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.</p> <p>Each member of a backer identified in response to this section must complete either:</p> <ul style="list-style-type: none"> • Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or • Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership
Aaron Wesley Ford	[REDACTED]



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Section C: Licenses, Permits and Registrations			
Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.			
13. State CT, et al	14. Issue Date (month/year): 8/1994 Expiration Date (month/year): 10/1997	15. Type: Series 63 Uniform Secu	16. Number: CRD# 2526739
17. State CT, et al	18. Issue Date (month/year): 4/2001 Expiration Date (month/year): 8/2010	19. Type: Series 63 Uniform Secu	20. Number: CRD# 2526739

Section D: Legal Proceedings
<p>21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the details of such proceeding or petition.</p>
<p>22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.</p>
<p>23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.</p>
<p>24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the details of such fines or penalties.</p>

Section E: Criminal Actions
<p>25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.</p>



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature:



[Redacted Signature]

27. Date Signed:

11/8/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature:



[Redacted Signature]

29. Date Signed:

11/8/13



MEDICAL MARIJUANA PROGRAM

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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other:
2. Legal Name of Backer: Sandra W. Soule						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number: [REDACTED]			10. Email Address: [REDACTED]	

Section B: Backer Members	
<p>If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.</p> <p>Each member of a backer identified in response to this section must complete either:</p> <ul style="list-style-type: none"> • Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or • Appendix D in all other instances. 	
11. Name (First, Middle, Last): Sandra W. Soule	12. Percentage of ownership [REDACTED]



MULTI-STATE MUTUAL LIABILITY PROGRAM

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Section C: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary. *NA*

13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number: NA
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number: NA

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?
 Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?
 Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?
 Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?
 Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature:

▶ [Redacted Signature]

27. Date Signed:

11/8/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature:

▶ [Redacted Signature]

29. Date Signed:

11/8/13



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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sole Proprietorship	Corporation	Limited Liability Co.	Partnership	Limited Liability Partnership	Unincorporated Association	Other:
2. Legal Name of Backer: Andrew Julius Sieghart						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number: [REDACTED]			10. E-mail Address: [REDACTED]	

Section B: Backer Members	
<p>If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.</p> <p>Each member of a backer identified in response to this section must complete either:</p> <ul style="list-style-type: none"> Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership
NA	NA



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Section C: Licenses, Permits and Registrations			
Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.			
13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number:
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings
<p>21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the details of such proceeding or petition.</p>
<p>22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.</p>
<p>23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.</p>
<p>24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the details of such fines or penalties.</p>

Section E: Criminal Actions
<p>25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.</p>



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature: ▶	[Redacted Signature]	27. Date Signed: 11-07-2013
---------------------	----------------------	--------------------------------

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature: ▶	[Redacted Signature]	29. Date Signed: 11-07-2013
---------------------	----------------------	--------------------------------



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Appendix B Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input checked="" type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other:
2. Legal Name of Backer: Josef Julius Sieghart						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number: [REDACTED]			10. E-mail Address: [REDACTED]	

Section B: Backer Members	
If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.	
Each member of a backer identified in response to this section must complete either: <ul style="list-style-type: none"> Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership



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Section C: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.

13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number:
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten-year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature: 	27. Date Signed: 11/07/2013
--------------------------------------------------------------------------------------------------	--------------------------------

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature: 	29. Date Signed: 11/07/2013
--------------------------------------------------------------------------------------------------	--------------------------------



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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input checked="" type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other: _____
2. Legal Name of Backer: Kyle Rusconi						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number: [REDACTED]			10. E-mail Address: [REDACTED]	

Section B: Backer Members	
If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.	
Each member of a backer identified in response to this section must complete either: <ul style="list-style-type: none"> Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership



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Section C: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.

13. State NY	14. Issue Date (month/year): 06/05 Expiration Date (month/year): 07/12	15. Type: FINRA Securities Assoc	16. Number: Series 63
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature: ▶	[Redacted Signature]	27. Date Signed: November 7, 2013
---------------------	----------------------	--------------------------------------

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature: ▶	[Redacted Signature]	29. Date Signed: November 7, 2013
---------------------	----------------------	--------------------------------------



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Appendix B

Producer Backer Information Form

This form must be completed by each person or entity identified as a producer backer in Appendix A, section J.

Section A: Backer Information						
1. Backer business type:						
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sole Proprietorship	Corporation	Limited Liability Co.	Partnership	Limited Liability Partnership	Unincorporated Association	Other: _____
2. Legal Name of Backer: Robert David Birnbaum						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): [REDACTED]						
5. City: [REDACTED]			6. State: [REDACTED]		7. Zip Code: [REDACTED]	
8. Daytime Telephone Number: [REDACTED]		9. Fax Number: [REDACTED]		10. E-mail Address: [REDACTED]		

Section B: Backer Members	
<p>If you selected anything other than "Sole Proprietorship" in response to Section A, identify the members of your organization. A member is any person with a direct or indirect ownership interest greater than 5%. Attach additional pages if necessary.</p> <p>Each member of a backer identified in response to this section must complete either:</p> <ul style="list-style-type: none"> Appendix C if they are also a director, owner, officer or other high-level employee of the producer; or Appendix D in all other instances. 	
11. Name (First, Middle, Last):	12. Percentage of ownership



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Section C: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits or registrations ever held, current or expired, by you. Attach additional pages if necessary.

13. State	14. Issue Date (month/year): Expiration Date (month/year):	15. Type:	16. Number:
17. State	18. Issue Date (month/year): Expiration Date (month/year):	19. Type:	20. Number:

Section D: Legal Proceedings

21. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

22. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.

23. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on your ability to serve as a backer for the applicant.

24. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section E: Criminal Actions

25. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.



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Section F: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. As the backer, or duly authorized representative of the backer, I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

26. Signature:



[Redacted Signature]

27. Date Signed:

11/10/2013

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

28. Signature:



[Redacted Signature]

29. Date Signed:

6/10/2013



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Appendix C

Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information		
1. Name (First, Middle, Last): Aaron Wesley Ford		
2. Street Address (including Apartment or Suite #): 43 Harding Road		
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: [REDACTED]	7. Telephone Number: [REDACTED]	8. E-mail Address: [REDACTED]
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female

Section B: Employment Information		
12. Current or Most Recent Employer: Lumius Capital LLC		13. Date of Employment: Start Date: 08/20/2012 End Date: : current
14. Employer Address (including Apartment or Suite #): 243 Tresser Boulevard, 17th floor		
15. City: Stamford	16. State: CT	17. Zip Code: 06901
18. Daytime Telephone Number: 203-663-3800 ext 700	19. Fax Number: n/a	20. E-mail Address: aford@lumiuscapital.com

Section C: Marijuana or Agriculture Business Experience
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State CT, et al	27. Issue Date (month/year): 8/1994 Expiration Date (month/year): 10/1997	28. Type: Series 63 Uniform Sect	29. Number: CRD# 2526739
30. State CT, et al	31. Issue Date (month/year): 4/2001 Expiration Date (month/year): 8/2010	32. Type: Series 63 Uniform Sect	33. Number: CRD# 2526739

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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36. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.

37. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section G: Criminal Actions

38. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section H: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

39. Signature:

40. Date Signed:

11/8/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

41. Signature:

42. Date Signed:

11/8/13

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - NetCentric Partners LLC (originally formed as Ford Capital LLC)
- Products or services offered;
 - Venture Capital
- The business location;
 - Old Greenwich, CT and New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each;
 - Founder, Managing Director (1999-2001)
Negotiated agreements, raised outside capital, performed company due diligence, served as board member of startup venture-backed company
- The dates of your association with the business;
 - 1999-2001
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - Closed business in 2001 to pursue other interests
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - No
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - This role provided me an opportunity to review, diligence, and analyze hundreds of small and startup businesses. For those companies we passed on investing, I could watch and understand what worked and what did not work for these small businesses. For those companies we chose to invest in, I had board level participation in helping guide these companies through growth which included financing, hiring, marketing, management incentive plans, and more. Many of our companies we led to successful exits by way of sale or liquidity events. It also provided me with the ability and network to raise needed capital and structure investment interests.

(continued)

- The business name;
 - BNP Paribas
- Products or services offered;
 - Investment Banking
- The business location;
 - New York, NY
- All titles and responsibilities held by you at the business, including the time frame for each;
 - Managing Director (2005-2010), Deputy Head of Equities Division (2009-2010), Head of Sales in the Americas (2008-2010), Member of Global Business Committee, 25 members overseeing ~1500 person global division (2007-2010), Member of Global Management Committee, 75 members responsible for strategy of global division (2009-2010) Managed up to 300 staff throughout the Americas (5 offices) responsible for Proprietary Trading, Primé Brokerage, Listed Options, Complex Derivatives, Convertible Bonds, Stock Execution, Structured Products, Corporate Derivatives, Research Sales, Fund Derivatives
- The dates of your association with the business;
 - 2005-2010
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - Left company in 2010 to pursue other interests
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - No (not during my tenure; business existed prior to and after my tenure)
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - This role provided me an opportunity to build a small operation into a large successful diversified division in a heavily regulated environment. More specifically, I had to manage people, budgets, business lines, and more while remaining compliant with SEC, FINRA, and state regulations. I needed to have systems and procedures in place to monitor compliance while at the same time setting incentive programs and establishing a strong corporate culture. My role required continuing education on various legal and compliance issues such as money laundering, record keeping, employment laws, and more. Further, having understood the value of maintaining an ethical reputation with our clients and employees and behaving responsibly as a member of an SRO is of tremendous value when considering the build out of Curaleaf.



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Appendix C

Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information			
1. Name (First, Middle, Last): April, Amanda, Arrasate			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: COO		7. Telephone Number: [REDACTED]	8. E-mail Address: april@curaleaf.com
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	

Section B: Employment Information			
12. Current or Most Recent Employer: Sole Proprietorship		13. Date of Employment: Start Date: 10/30/2011 End Date: :	
14. Employer Address (including Apartment or Suite #): [REDACTED]			
15. City: [REDACTED]		16. State: [REDACTED]	17. Zip Code: [REDACTED]
18. Daytime Telephone Number: [REDACTED]	19. Fax Number: [REDACTED]	20. E-mail Address: april@curaleaf.com	

Section C: Marijuana or Agriculture Business Experience	
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations. 	



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State CT	27. Issue Date (month/year): 10/07 Expiration Date (month/year):	28. Type: Attorney	29. Number: 428497
30. State SC	31. Issue Date (month/year): 03/07 Expiration Date (month/year):	32. Type: Attorney	33. Number: 76884

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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36. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.

37. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section G: Criminal Actions

38. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section H: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

39. Signature:

40. Date Signed:

11/8/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

41. Signature:

42. Date Signed:

11/8/13

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Caretaker
- Products or services offered;
 - Caretaker for my mother
- The business location;
 - Farmington, CT
- All titles and responsibilities held by you at the business, including the time frame for each;
 - caretaker
- The dates of your association with the business;
 - 2008-2011
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - My mother passed in 2011
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - none
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

At the beginning of 2008, I was a practicing attorney with a prominent firm in South Carolina when my mother was diagnosed with breast cancer. I returned home to Connecticut to care for her. We went through chemotherapy, radiation and a double mastectomy. Two years later the cancer returned with a vengeance and claimed her life on this earth.

The side effects of the treatments were devastating, and ultimately they failed. Earlier in my career, I had worked in pharmaceutical research and development (in labs at Channing, Harvard Medical School, and Brigham and Women's Hospital.) I began researching medical marijuana as a patient option and consulted Dr. Andrew Salner, who had been my mother's radiation oncologist. He expressed his approval of the drug as a patient option. Since then, I have working full time to realize the vision of a pharmaceutical company committed to providing patients with this product thus affording them a wider array of treatment options, and am ready to apply my full range of legal and organizational skills, and all my energy, to serving patients through Curaleaf.

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Channing Laboratory
- Products or services offered;
 - Harvard Medical School Microbiological R & D Lab
- The business location;
 - Boston, MA
- All titles and responsibilities held by you at the business, including the time frame for each;
 - Research Assistant
- The dates of your association with the business;
 - 2000-2002
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - No longer currently at that position, Moved out of the area
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - none
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - Laboratory Research
 - Animal Studies
 - Antigen Production
 - Lab Safety
 - Supervisory skills
 - Data interpretation
 - Research and Development of Experimental Drug
 - Transfer Production Tech
 - Provide health promotion, counseling and education
 - Interpret patient information and make critical decisions about needed actions
 - Coordinate care, in collaboration with a wide array of healthcare professionals
 - Conduct research in support of improved practice and patient outcomes

Explanation of Criminal Background Check.

April Arrasate

In the summer of 2004, I attended a music show at the House of Blues concert venue in North Myrtle Beach, South Carolina. I attended the show with a group of friends but we quickly lost each other in the chaotic and crowded environment.

The show eventually got out of hand and the North Myrtle Beach Police were called to the scene. I was arrested with a group of kids, none of whom were the people I came to the show with, and hauled off to the station in a Paddy Wagon. I felt that I was caught up with the wrong crowd and protested the entire time.

The charges filed against me were disobeying a police officer, resisting arrest and fighting. All of these are handled by the city court, are considered non-violent crimes and carry, together, a maximum of 30 days. Because of the late hour, my friends were unable to post the money to get me out of the holding area. I spent the night there and it was one of the worst nights of my life.

Upon seeing the judge in the morning, the procedure was that you could plead guilty, and be processed immediately, or plead not guilty and have to wait several more hours to be processed. I was so out of sorts from the night in that facility, that I plead guilty. Had I been in any state of mind to realize the full ramifications of the plea, I would never plead, but the only thing I could think about was being released immediately.

In hind sight, I cannot believe that I made such an error, especially considering that I ultimately came to practice in the firm of the North Myrtle Beach District Attorney, who reviewed my record and assured me the charges would have most likely been dropped. He is currently in the process of getting my record expunged, but in the interest of total candor, I wished to explain this event.

I regret the experience whole heartedly, and any inconvenience that I caused to the local officials. I have tried to see the experience in a positive light, and can truly say that it has given me a greater respect and understanding of the issue of confinement, which has at times proved useful in understanding and explaining the laws and their consequences to my clients.

Since that experience, I have completed law school, passed two state bar exams and become a member in good standing with both state supreme courts. I have held several positions in reputable law firms, formed my own practice and also opened a small business. I have had no other incidents with any law enforcement or regulatory agency.



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Appendix C

Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information			
1. Name (First, Middle, Last): Eileen Konieczny			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: founder/visionary/chief medical of		7. Telephone Number: [REDACTED]	8. E-mail Address: eileen@curaleaf.com
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]		11. Gender: <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female

Section B: Employment Information		
12. Current or Most Recent Employer: Connecticut Cannabis Business Alliance		13. Date of Employment: Start Date: 01/01/2013 End Date: : 06/01/2013
14. Employer Address (including Apartment or Suite #): 109 Federal Rd. #204		
15. City: Danbury		16. State: CT
		17. Zip Code: 06811
18. Daytime Telephone Number: (203) 321-3727	19. Fax Number:	20. E-mail Address:

Section C: Marijuana or Agriculture Business Experience
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State ct	27. Issue Date (month/year): 11/13 Expiration Date (month/year): 11/14	28. Type: Professional RN	29. Number: 096716
30. State NY	31. Issue Date (month/year): 06/05 Expiration Date (month/year):	32. Type: Professional RN	33. Number: 566932

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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36. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identity of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.

37. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

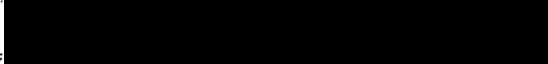
Section G: Criminal Actions

38. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section H: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

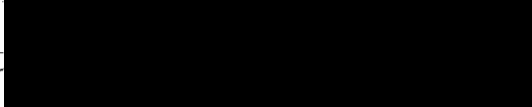
39. Signature: 

40. Date Signed:

11/8/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

41. Signature: 

42. Date Signed:

11/8/13

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Olive's Branch
- Products or services offered;
 - Professional Registered Nurse
 - Patient advocacy
 - education
- The business location;
 - Connecticut/New York
- All titles and responsibilities held by you at the business, including the time frame for each;
 - Founder/Owner
- The dates of your association with the business;
 - 2013
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - patient advocacy in the area of medical cannabis
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - none
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - I am a lifelong oncology nurse who has devoted myself to finding alternative treatments for suffering patients. I watched my mother and sister suffer and ultimately fall victim to cancer. I have stood by scores of patients throughout my career as they tried to hold on to some quality of life. In medical cannabis, I have found a way to provide some of these patients with one more therapeutic option in the present pharmacopeia. Educating patients was the mission of Olive's Branch. Providing patients with more options is the heart and the motivation of Curaleaf.

My professional journey has led to broad knowledge of cannabinoid science. I think it is fair to say that I am well known for my commitment to the patient and the patient's best interest. Curaleaf will serve patients in a manner consistent with my entire career.

25. If you answered “yes” to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Connecticut Cannabis Business Alliance
- Products or services offered;
 - Professional Registered Nurse
 - The Connecticut Cannabis Business Alliance is a professional trade organization created to educate patients, providers, policy makers and the public about the palliative and curative health benefits of medical cannabis, to develop industry standards and best practices to ensure quality products and distribution channels, and to facilitate safe access to authorized and qualified cannabis-based remedies in Connecticut.
- The business location;
 - Connecticut
- All titles and responsibilities held by you at the business, including the time frame for each;
 - As Executive Director I was responsible for the day to day management of the organization
- The dates of your association with the business;
 - 1/2013 – 6/2013
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - No longer currently at that position, I left that position to pursue a license to produce and dispense medical cannabis in CT
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - none
- How this experience is relevant to the department’s evaluation of the RFA response of the applicant with whom you are associated.

As Executive Director of The Connecticut Cannabis Business Alliance, I:

 - encouraged policies to stimulate economic development for the medical marijuana industry as well as business in general for Connecticut, serving as a voice of its members to relevant local, state and national governing bodies.
 - Supported the belief that the use of medical cannabis as an alternative treatment can help people improve their quality of life. Developed educational materials regarding the endocannabinoid system, medical cannabis, current research, safe &/or safer methods of administration for dissemination to healthcare workers, patients, families and community members to provide a complete and accurate picture of the medical cannabis industry.

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

The business name;

- Olive's Branch

Products or services offered;

- Professional Registered Nurse
 - Patient advocacy
 - education
- The business location;
- Connecticut/New York

All titles and responsibilities held by you at the business, including the time frame for each;

- Founder/Owner

The dates of your association with the business;

- 2013

Whether you currently have a role at the business and, if not, when your involvement terminated and why;

- patient advocacy in the area of medical cannabis

Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and

- none

How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

- Developed educational materials regarding the endocannabinoid system, medical cannabis, current research, safe &/or safer methods of administration
- Developed patient advocacy program
- Created and compiled vast amounts of patient education materials and compiled them on my website to provide patients with a reliable, no cost source of information.
- Provide health promotion, counseling and education to patients at no cost.

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

The business name;

- Connecticut Cannabis Business Alliance

Products or services offered;

- Professional Registered Nurse
- The Connecticut Cannabis Business Alliance is a professional trade organization created to educate patients, providers, policy makers and the public about the palliative and curative health benefits of *medical cannabis*, to develop industry standards and best practices to ensure quality products and distribution channels, and to facilitate safe access to authorized and qualified cannabis-based remedies in Connecticut.

The business location;

- Connecticut

All titles and responsibilities held by you at the business, including the time frame for each;

- As Executive Director The dates of your association with the business;
- 1/2013 – 6/2013

Whether you currently have a role at the business and, if not, when your involvement terminated and why;

- Stepped down

Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and

- none

How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

- Hosted seminars for parties interested in the incoming medical marijuana industry
- Educated them on the therapeutic benefits.
- Brought in my contacts from across the country to speak to legislators and industry persons.
- Became extremely familiar with the regulations
- Responsible for the day to day management of the organization
- served as a voice of its members to relevant local, state and national governing bodies.
- created and implemented business events and social activities which will promote and enhance our members' business successes as well as support our local communities.



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Appendix C

Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information			
1. Name (First, Middle, Last): Robert David Birnbaum			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]	
6. Title: Chief Executive Officer		7. Telephone Number: [REDACTED]	8. E-mail Address: [REDACTED]
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	

Section B: Employment Information			
12. Current or Most Recent Employer: Peartree Trading, LLC		13. Date of Employment: Start Date: 10/15/2009 End Date: : 11/15/2013	
14. Employer Address (including Apartment or Suite #): [REDACTED]			
15. City: [REDACTED]	16. State: [REDACTED]	17. Zip Code: [REDACTED]	
18. Daytime Telephone Number: [REDACTED]	19. Fax Number: [REDACTED]	20. E-mail Address: [REDACTED]	

Section C: Marijuana or Agriculture Business Experience
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State	27. Issue Date (month/year): Expiration Date (month/year):	28. Type:	29. Number:
30. State	31. Issue Date (month/year): Expiration Date (month/year):	32. Type:	33. Number:

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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36. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.

37. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section G: Criminal Actions

38. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section H: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

39. Signature:

40. Date Signed:

11/10/13

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.

41. Signature:

42. Date Signed:

11/10/13

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Third Wave Global Investors, LLC

- Products or services offered;
 - Hedge Fund
- The business location;
 - Greenwich, CT
- All titles and responsibilities held by you at the business, including the time frame for each;
 - Co-Founder, President, Chief Operating Officer, Chief Compliance Officer, tax matters member, and Director of all domestic and non-U.S. hedge funds offered by Third Wave
- The dates of your association with the business;
 - 2004-2009
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - Resigned in 2009 to pursue other interests.
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - no
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - The role of Chief Compliance Officer (COO) was the culmination of over two decades working for SEC (Security and Exchange Commission) registered firms, and being subject to the regulatory regime of the SEC. I learned at an early stage in my career the importance of a deep understanding of the regulatory regime—not only the rules promulgated, but the underlying legislation and the public policy goals expressed therein. As COO, I carried personal liability for the actions of my firm. I was comfortable and confident in doing so because I installed and enforced (with the assistance of outside counsel) a rigorous system of compliance education, inspection, reporting, and documentation, including regular compliance reviews. I'm pleased to say that Third Wave never had any compliance or regulatory issues. I look forward to working with curaleaf's regulators to insure that curaleaf meets or exceeds the standards set by the Department.



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Appendix C Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information			
1. Name (First, Middle, Last): Joseph Louis Stevens			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: Chief Compliance Officer		7. Telephone Number: [REDACTED]	8. E-mail Address: [REDACTED]
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]		11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female

Section B: Employment Information			
12. Current or Most Recent Employer: Greenleaf Compassion Center		13. Date of Employment: Start Date: 10/23/2009 End Date: :	
14. Employer Address (including Apartment or Suite #): 395 Bloomfield Avenue			
15. City: Montclair		16. State: NJ	17. Zip Code: 07042
18. Daytime Telephone Number: (973) 337-5670		19. Fax Number:	20. E-mail Address: joe@greenleafcompassion.com

Section C: Marijuana or Agriculture Business Experience
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State NJ	27. Issue Date (month/year): 10/12 Expiration Date (month/year): 10/13	28. Type: Alternative Treatment C	29. Number:
30. State NJ	31. Issue Date (month/year): 08/07 Expiration Date (month/year): 12/14	32. Type: Diagnostic Radiology	33. Number: 642467

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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Appendix D Backer Members

Authorization for Release of Personal History Form

This form must be completed and signed by any member of a Backer that is not required to complete Appendix C.

Section A: Member Information			
1. Name (First, Middle, Last): Joseph Louis Stevens			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Daytime Phone Number: [REDACTED]	7. Fax Number: [REDACTED]	8. E-mail Address: [REDACTED]	

Section B: Criminal Actions
9. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section C: Criminal Background Check	
I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.	
10. Signature: ▶ [REDACTED]	11. Date Signed: 11/11/13

I hereby certify that the above information is correct and complete.	
I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.	
12. Signature: ▶ [REDACTED]	13. Date Signed: 11/11/13

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
 - Greenleaf Compassion Center, A NJ Non-Profit Corporation
- Products or services offered;
 - Products or services offered; Cultivation and Dispensing of Medicinal Marijuana
- The business location;
 - 395 Bloomfield Avenue, Montclair NJ
- All titles and responsibilities held by you at the business, including the time frame for each;
 - CEO and President Board Member
- The dates of your association with the business;
 - 2009-2013
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - Board Member
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - none
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - Large scale production of Medical Cannabis in a heavily regulated industry.
 - Compliance
 - Communication skills
 - Supervisory skills
 - Operations
 - Education



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Appendix C

Directors, Owners, Officers or Other High-Level Employees Background Information Form

To be completed by all persons identified in your response to Appendix A, section K.

Section A: Personal Information			
1. Name (First, Middle, Last): Andrew Julius Sieghart			
2. Street Address (including Apartment or Suite #): 105 Parade Hill Road			
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: 06840	
6. Title:	7. Telephone Number: [REDACTED]	8. E-mail Address: [REDACTED]	
9. Date of Birth: [REDACTED]	10. Social Security Number: [REDACTED]	11. Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	

Section B: Employment Information			
12. Current or Most Recent Employer: Framework Capital Partners, LLC		13. Date of Employment: Start Date: 06/01/2012 End Date: : Present	
14. Employer Address (including Apartment or Suite #): [REDACTED]			
15. City: [REDACTED]	16. State: [REDACTED]	17. Zip Code: [REDACTED]	
18. Daytime Telephone Number: [REDACTED]	19. Fax Number: [REDACTED]	20. E-mail Address: [REDACTED]	

Section C: Marijuana or Agriculture Business Experience
21. Other than the applicant, do you have any experience controlling, managing, operating or working for a marijuana or agriculture business? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
23. If you answered "yes" to question 21 or 22, attach a statement setting forth the following information for each marijuana or agriculture business with which you have been associated: <ul style="list-style-type: none"> • The business name; • Products or services offered; • The business location; • All titles and responsibilities held by you at the business, including the time frame for each; • The dates of your association with the business; • Whether you currently have a role at the business and, if not, when your involvement terminated and why; and • Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations.



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Section D: Other Relevant Business Experience

24. Do you have any experience controlling, managing, operating or working for any other business that you believe may be relevant to the department's evaluation of the applicant with whom you are associated?

Yes No

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- The business name;
- Products or services offered;
- The business location;
- All titles and responsibilities held by you at the business, including the time frame for each;
- The dates of your association with the business;
- Whether you currently have a role at the business and, if not, when your involvement terminated and why;
- Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
- How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.

Section E: Licenses, Permits and Registrations

Provide information regarding all state licenses, permits and registrations ever held, current or expired by you. Attach additional pages if necessary.

26. State	27. Issue Date (month/year): Expiration Date (month/year):	28. Type:	29. Number:
30. State	31. Issue Date (month/year): Expiration Date (month/year):	32. Type:	33. Number:

Section F: Legal Proceedings

34. Have you, or has any entity over which you exercised management or control, had any petition filed by or against you, or otherwise sought relief under, any provision of the Federal Bankruptcy Act or under any State insolvency law in the last ten year period?

Yes No

If the answer above is "yes", attach a statement providing the details of such proceeding or petition.

35. Have you, or has any entity over which you exercised management or control, ever had a professional license, permit or registration in Connecticut, or any other State, suspended, revoked or otherwise subjected to disciplinary action?

Yes No

If the answer above is "yes", attach a statement providing the date(s), the type of license, permit or registration at issue, and a description of the circumstances relating to each suspension, revocation or other disciplinary action.



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36. Are you a party to any legal proceedings where damages, fines or civil penalties may reasonably be expected to exceed \$500,000 above any insurance coverage available to cover the claim?

Yes No

If the answer above is "yes", attach a statement describing the litigation, including the title and docket number of the litigation, the name and location of the court before which it is pending, the identify of all parties to the litigation, the general nature of the claims being made and the impact an unfavorable opinion may have on the applicant or the applicant's operations.

37. Have you, or has any entity over which you exercised management or control, ever had any fines or other penalties over \$10,000 assessed by any regulatory agency?

Yes No

If the answer above is "yes", attach a statement providing the details of such fines or penalties.

Section G: Criminal Actions

38. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? Yes No

If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section H: Criminal Background Check

I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.

39. Signature:

[Redacted Signature]

40. Date Signed:

11-07-2013

I hereby certify that the above information is correct and complete.

I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-177b of the Connecticut General Statutes.

41. Signature:

[Redacted Signature]

42. Date Signed:

11-07-2013

25. If you answered "yes" to question 24, attach a statement setting forth the following information for each such business with which you have been associated:

- ☑ The business name;
 - Framework Capital Partners LLC
- ☑ Products or services offered;
 - Commercial and residential real estate investment partnerships
- ☑ The business location;
 - New Canaan, CT
- ☑ All titles and responsibilities held by you at the business, including the time frame for each;
 - Managing Partner (2012-Present)
 - Sourced, evaluated, structured, documented and raised capital for opportunistic direct equity investments in commercial and residual real estate transactions
- ☑ The dates of your association with the business;
 - 2012-Present
- ☑ Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - I am currently involved in the business as Managing Partner
- ☑ Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - No
- ☑ How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - This role provided me an opportunity to source, evaluate, diligence, structure and analyze dozens of relatively small (under \$10 million) commercial and residential real estate transactions. A large majority of the real estate transactions that I have worked on have been located in Fairfield County, CT due to the location of my firm and my deep knowledge of the area - having been raised in Greenwich, CT. Those investment opportunities I passed on, I have watched in order to understand what worked and what did not work for those locations. For those opportunities I chose to invest in, I had hands-on experience guiding these sites through every step – be it zoning approval, zoning variances, various permitting steps, discussions with local zoning boards, hiring of architects, employing and overseeing sub-contractors and their work, and proactive property management. My duties as a manager also focus largely on real estate budgeting, including but not limited to the cost of goods and services, in addition to projecting construction and business ramp-up timelines appropriately. I have found this skill, budgeting both capital and time accurately, to be critical when entering into real estate transactions, particularly when undertaking ground-up development and repositioning projects. This background and experience has proven useful in my involvement with Curaleaf. Curaleaf has managed to secure perfect locations and structures for its endeavors, all of which are zoned appropriately and have the support and backing of local zoning boards. The sites require a modest amount of capital for minor capital improvements, all monies for which have been budgeted for and raised (with contingency costs included). Lastly and perhaps most importantly, it is my estimation that Curaleaf's facilities will be able to be up and running within days, should it receive the proper licensing approval.

(continued)

- ☑ The business name;
 - G2 Investment Group
- ☑ Products or services offered;
 - Financial Services, Investment and Merchant Banking
- ☑ The business location;
 - New York, NY
- ☑ All titles and responsibilities held by you at the business, including the time frame for each;
 - Vice President, G2 Real Estate Partners (2009-2011)
Conducted analysis, structuring, documentation and capital raising for real estate investment opportunities across the entire capital structure. Additionally, restructured real estate deals as part of G2's advisory and restructuring business.
- ☑ The dates of your association with the business;
 - 2009-2011
- ☑ Whether you currently have a role at the business and, if not, when your involvement terminated and why;
 - Left company in 2011 as G2 dissolved its real estate practice.
- ☑ Whether the business was ever alleged to have violated the laws or regulations of the state or country in which it operates during the time period when you were associated with the business and, if so, the nature and resolution of those allegations; and
 - No (not during my tenure; business existed prior to and after my tenure)
- ☑ How this experience is relevant to the department's evaluation of the RFA response of the applicant with whom you are associated.
 - This role provided me an opportunity to expand on my knowledge of the real estate business and incorporate my legal education more than was previously the case. Most notably, during the downturn of the overall economy generally, and the collapse of the real estate market specifically, my involvement in the restructuring and advisory business allowed me to fully utilize my legal education in conjunction with my real estate structuring expertise. Restructuring over 50 real estate deals with an aggregate principal balance of \$19 billion for a very diverse client base provided me with invaluable insights into why certain deals failed while other seemingly similar deals succeeded. These insights have been useful as Curaleaf has entered into several contracts under which it will rent, own and operate real estate should it receive proper licensing and approval.



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Appendix D Backer Members

Authorization for Release of Personal History Form

This form must be completed and signed by any member of a Backer that is not required to complete Appendix C.

Section A: Member Information		
1. Name (First, Middle, Last): Kyle Joseph Rusconi		
2. Street Address (including Apartment or Suite #): [REDACTED]		
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Daytime Phone Number: [REDACTED]	7. Fax Number: [REDACTED]	8. E-mail Address: [REDACTED]

Section B: Criminal Actions
9. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section C: Criminal Background Check	
I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.	
10. Signature: ▶ [REDACTED]	11. Date Signed: November 7, 2013

I hereby certify that the above information is correct and complete.	
I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.	
12. Signature: ▶ [REDACTED]	13. Date Signed: November 7, 2013



MEDICAL MARIJUANA PROGRAM

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Appendix D Backer Members

Authorization for Release of Personal History Form

This form must be completed and signed by any member of a Backer that is not required to complete Appendix C.

Section A: Member Information			
1. Name (First, Middle, Last): Sandra W. Soule			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Daytime Phone Number: [REDACTED]	7. Fax Number: [REDACTED]	8. E-mail Address: [REDACTED]	

Section B: Criminal Actions
9. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section C: Criminal Background Check	
I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.	
10. Signature: [REDACTED]	11. Date Signed: 11/8/13

I hereby certify that the above information is correct and complete.	
I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.	
12. Signature: [REDACTED]	13. Date Signed: 11/8/13



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Appendix D Backer Members

Authorization for Release of Personal History Form

This form must be completed and signed by any member of a Backer that is not required to complete Appendix C.

Section A: Member Information		
1. Name (First, Middle, Last): Josef Julius Sieghart		
2. Street Address (including Apartment or Suite #): [REDACTED]		
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Daytime Phone Number: [REDACTED]	7. Fax Number: [REDACTED]	8. E-mail Address: [REDACTED]

Section B: Criminal Actions
9. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section C: Criminal Background Check	
I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.	
10. Signature: [REDACTED]	11. Date Signed: 11/07/2013

I hereby certify that the above information is correct and complete.	
I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.	
12. Signature: [REDACTED]	13. Date Signed: 11/07/2013



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Appendix D Backer Members

Authorization for Release of Personal History Form

This form must be completed and signed by any member of a Backer that is not required to complete Appendix C.

Section A: Member Information			
1. Name (First, Middle, Last): Jack Lawrence Rubin			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Daytime Phone Number: [REDACTED]	7. Fax Number: [REDACTED]	8. E-mail Address: [REDACTED]	

Section B: Criminal Actions
9. Have you ever been convicted of a crime or received a suspended sentence, deferred sentence, or forfeited bail for any offense in criminal or military court or do you have any charges pending? <input type="checkbox"/> Yes <input type="checkbox"/> No
If the answer above is "yes", attach a statement providing the date(s) of conviction(s), name of individual(s) involved, the court(s) where the case(s) were decided, a description of the circumstances relating to each offense or for the pending charges and the outcome of the proceedings.

Section C: Criminal Background Check	
I understand that the department may review criminal background records for purposes of evaluating my suitability to participate in the medical marijuana program. I hereby authorize the release of any and all information of a confidential or privileged nature to the department and its agents.	
10. Signature: [REDACTED]	11. Date Signed: November 9, 2013

I hereby certify that the above information is correct and complete.	
I fully understand that if I knowingly make a statement that is untrue and which is intended to mislead the Department of Consumer Protection or any person designated by the Department in the performance of their official function, I will be in violation of Section 53a-157b of the Connecticut General Statutes.	
12. Signature: [REDACTED]	13. Date Signed: November 9, 2013



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Appendix A Producer License Information Form

Section A: Business Information

1. Applicant business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other: _____
2. Legal Name of Applicant: CURALEAF, LLC						
3. Trade Name of Applicant: curaleaf						
4. Applicant's Business Address: 145 Doubling Road						
5. City: Greenwich				6. State: CT	7. Zip Code: 06830	
8. Daytime Telephone Number: (860) 620-3947			9. E-mail Address: april@curaleaf.com			
10. Applicant's Mailing Address (if different than business address): 13 East St					11. City: Collinsville	
12. State: CT	13. Zip Code: 06032		14. Daytime Telephone Number: [REDACTED]		15. Fax Number: (866) 409-2915	

Section B: Contact Information

All communications from the department regarding this application will be sent to your primary contact and alternate contact, if one is designated. We will assume that you receive all communications sent to your designated contact(s) and it will be your responsibility to notify us if any of your contact information changes.

16. Name of Primary Contact: Eileen Konieczny		17. Primary Contact Title: Chief Medical Officer	
18. Primary Contact E-mail Address: Eileen@curaleaf.com		19. Primary Contact Telephone Number: [REDACTED]	
20. OPTIONAL - Name of Alternate Contact: April Arrasate		21. Alternate Contact Title: Chief Operating Officer	
22. Alternate Contact E-mail Address: april@curaleaf.com		23. Alternate Contact Telephone Number: [REDACTED]	

Section C: Formation/Incorporation Information

24. Date of Formation/Incorporation: 10/24/2013		25. Place of Formation/Incorporation: Commerical Recording Division,	
26. Registered with the Connecticut Secretary of State: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		27. Sale and Use Tax Permit Number: 60346111 Provide a copy of your Sale and Use Tax permit with your application.	



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Appendix A Producer License Information Form

Section A: Business Information						
1. Applicant business type:						
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> Corporation	<input checked="" type="checkbox"/> Limited Liability Co.	<input type="checkbox"/> Partnership	<input type="checkbox"/> Limited Liability Partnership	<input type="checkbox"/> Unincorporated Association	<input type="checkbox"/> Other: _____
2. Legal Name of Applicant: CURALEAF, LLC						
3. Trade Name of Applicant: curaleaf						
4. Applicant's Business Address: 145 Doubling Road						
5. City: Greenwich				6. State: CT	7. Zip Code: 06830	
8. Daytime Telephone Number: (860) 620-3947			9. E-mail Address: april@curaleaf.com			
10. Applicant's Mailing Address (if different than business address): 13 East St					11. City: Collinsville	
12. State: CT	13. Zip Code: 06032		14. Daytime Telephone Number: [REDACTED]		15. Fax Number: (866) 409-2915	
Section B: Contact Information						
All communications from the department regarding this application will be sent to your primary contact and alternate contact, if one is designated. We will assume that you receive all communications sent to your designated contact(s) and it will be your responsibility to notify us if any of your contact information changes.						
16. Name of Primary Contact: Eileen Konieczny				17. Primary Contact Title: Chief Medical Officer		
18. Primary Contact E-mail Address: Eileen@curaleaf.com				19. Primary Contact Telephone Number: [REDACTED]		
20. OPTIONAL - Name of Alternate Contact: April Arrasate				21. Alternate Contact Title: Chief Operating Officer		
22. Alternate Contact E-mail Address: april@curaleaf.com				23. Alternate Contact Telephone Number: [REDACTED]		
Section C: Formation/Incorporation Information						
24. Date of Formation/Incorporation: 10/24/2013			25. Place of Formation/Incorporation: Commerical Recording Division,			
26. Registered with the Connecticut Secretary of State: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			27. Sale and Use Tax Permit Number: 60346111 Provide a copy of your Sale and Use Tax permit with your application.			

Introduction

Curaleaf is applying for a Medical Marijuana Producer License in order to improve the health, well-being, and quality of life of the patient community in Connecticut, by producing the finest pharmaceutical grade medical cannabis and helping educate those in need. Curaleaf will offer medical cannabis in familiar medical form in order that qualifying “cannabis-naïve” patients can feel comfortable with this treatment that can do so much for them.

Curaleaf is dedicated to using scientific research and patient data to achieve the role set out for us by the State with an unwavering commitment to regulatory compliance and sustainability.

Curaleaf presents a compelling combination of vision, capabilities, capital, and people.

- Founded by a medical professional and true visionary in the field of medical cannabis. Assembled team of the most respected medical and scientific experts in the medical cannabis community.
 - Well-known to Connecticut and national legislators, regulators, and other government officials.
 - Committed to the role of rigorous regulation to advance cannabis as a useful medicine.
- An outstanding production facility in a secure location.
- A team of cultivation and production experts with years of experience in states where cultivation has been legal to help ensure a successful launch and train local hires.
- An Advisory Board of top medical scientists to advise and drive the Curaleaf research agenda.
- Strong financial backing from longtime Connecticut residents.
 - \$6 million in committed capital.
 - 2 million in cash held in our bank account to fund the State’s escrow requirement.
 - Additional capital available as required.
- Capable executive leadership.
 - An experienced leader and entrepreneur as CEO with expertise in finance, operations, compliance, and management in a highly regulated industry.
 - An attorney and co-founder as COO, with a background in pharmaceutical research and development.
 - A Board of Directors with broad expertise to ensure the success of Curaleaf: finance, real estate development and management, marketing, compliance, venture capital, private equity, and entrepreneurship with from start up to large company phase.
- A Chief Compliance Officer with experience operating a medical marijuana clinic in a regulated state (NJ).

The People Behind
Curaleaf

- Eileen Koniczny, President and Chief Visionary is an oncology nurse with more than twenty years experience. She is on the board of the American Cannabis Nurses Association and is the former Executive Director of the Connecticut Cannabis Business Alliance. Eileen actively educated Connecticut legislators during the creation and passage of the Connecticut medical marijuana bill and also contributed to the Department of Consumer Protection's formulation of the regulations. Her excellent reputation in the medical cannabis community has inspired the most respected medical, cultivation and scientific experts in the industry to join the Curaleaf team.
- April Arrasate, Chief Operating Officer, is a Connecticut attorney with a background in pharmaceutical research and development. April lost her mother to breast cancer in 2011 and has since transitioned into the realm of patient advocacy, using her pharmaceutical background to explore patient options in new medicines.
- [In their activities as patient advocates and educators, both Ms. Kocienczny and Ms. Arrasate have been personally endorsed by industry and community leaders—Ms. Kocienczny by Dr. Alan Shackleford (featured on Sanjay Gupta's CNN special on medical cannabis) and Ms. Arrasate by prominent local oncologist Dr. Andrew Salner, State Senator Kevin Witkos, Simsbury Chief of Police Peter Ingvertsen and Simsbury Town Planner Hiram Peck. Letters appear later in this application]
- Robert Birnbaum, Chief Executive Officer is a financial expert with a strong history in compliance and regulated environments. Robert has successfully managed both large and small organizations in addition to founding a successful start-up and has the experience necessary to ramp up and oversee the Curaleaf organization.
- Joseph Stevens, Compliance Officer, is the founder of Greenleaf Compassion Center, New Jersey's first operational medical marijuana alternative treatment center (ATC) in the state. New Jersey was the first state to enact highly regulated regulations including strong governmental oversight.
- The Curaleaf investors are largely longtime Connecticut residents using their own funds. In addition to being upstanding and well respected members of the community, they bring broad business experience and management skills to the venture. Curaleaf has the financial strength to fulfill its mission as envisioned by the state. Curaleaf has \$6 million committed capital, including \$2 million in cash held ready (currently in an account at First County Bank) to satisfy the state's escrow requirement.

The Curaleaf Facility

The Curaleaf production facility is located in the former world headquarters building of Ensign Bickford Aerospace & Defense, a global leader of precision energetics systems and innovative explosive solutions. Because the building was designed for high tech manufacture, it is equipped with desirable characteristics such as clean rooms, extensive power and HVAC systems, industrial chillers and an inherently secure design and location. It is located in an industrial zone, which is consistent with the local zoning requirements for the production of medical marijuana in the town of Simsbury.

Curaleaf is Financially Strong.

- \$6 million committed capital.
- \$2 million in cash held ready [REDACTED] to satisfy the state's escrow requirement.
- [REDACTED]
- Additional resources can be provided if necessary.

Funding is provided by seven individuals—six long time Connecticut residents, one from Westchester County—using their own resources. These individuals have broad business experience, include managing large and small organizations, manufacturing, entrepreneurship, venture capital, real estate and private equity. Several have served on Boards of successful startups. One of this group will take an active day-to-day role in management as CEO; others will serve on Curaleaf's Board. They provide the business experience and financial strength to enable Curaleaf to fulfill its mission successfully.

Board of Advisors

- Dr. Sunil Kumar Aggarwal, M.D., Ph.D. is well known for conducting human studies of medical cannabis use under the first-ever granted federal Certificates of Confidentiality for patients in the study of both cannabis delivery and medical consultation.
- Jahan Marcu, Ph.D., is the Vice-Chair of the Americans for Safe Access Multi-disciplinary Scientific Advisory Board and is currently investigating the pharmacology of cannabinoid receptors at Temple University. He received his Ph.D. for studying the CB1 receptor, and the role of the endocannabinoid system in bone. He is a court qualified cannabis and synthetic cannabinoid expert and received the Cannabis Researcher of the Year award for 2012. Dr. Marcu has crafted a research plan for Curaleaf.
- Pericles Calias, PhD. in organic chemistry and drug delivery has committed to a research plan that will explore microencapsulation and uptake agents in the processing of medical cannabis to target particular receptors present in the body's cannabinoid system.
- Khary Bryan, a Doctor of Pharmacy and cannabinoid expert. Dr. Bryan is a member of the International Cannabinoid Research Society, the Canadian Consortium for the Investigation of Cannabinoids, and the Society of Cannabis Clinicians. He research interests include the use of HPTLC as a cost effective and accurate cannabinoid analysis method.
- Dr. Robert Stark practices internal medicine and cardiology in Greenwich, Connecticut. A graduate of Harvard Medical School, Dr. Stark has done advanced training in cardiology and cholesterol metabolism at the National Institutes of Health (N.I.H.). He is Medical Director of the Cardiovascular Prevention Program at Greenwich Hospital/Yale New Haven Health, and teaches on the clinical faculty of the New York Medical College. Dr. Stark has a special interest in the physician-patient relationship and its potential therapeutic value. He's also focused on the impact of diet, lifestyle, relationships and mindset and their role in overall well-being.
- Mary Lynn Mathre, RN, MSN, CARN is the President and Co-founder of Patients Out of Time, a national non-profit organization dedicated to educating health care professionals and the public about the therapeutic use of cannabis. She is editor of Cannabis in Medical Practice: A Legal, Historical Pharmacological Overview of the Therapeutic Use of Cannabis (1997) and co-editor of Women and Cannabis: Medicine, Science and Sociology (2002). Ms. Mathre's focus on medicinal cannabis began in 1985 with the completion of her graduate thesis on Disclosure of Marijuana Use to Health Care Professionals. Since then she has authored cannabis resolutions for several organizations including the Virginia Nurses Association, the National Nurses Society on Addictions (now the International Nurses Society on Addictions), and the American Public Health Association; written numerous articles and chapters on medicinal cannabis; and served as an expert witness. Ms. Mathre is a founding member and President of the newly created American Cannabis Nurses Association.
- It is a tribute to Ms. Konieczny's reputation and the strength of her vision that professionals such as these have chosen to serve on Curaleaf's Board of Advisors. Their support strengthens Curaleaf and Connecticut's program.

Summary

Curaleaf, by virtue of its vision, people, facility, scientific and production capabilities, management depth, and financial strength, is well-qualified to be awarded a license as a Medical Marijuana Producer in Connecticut.

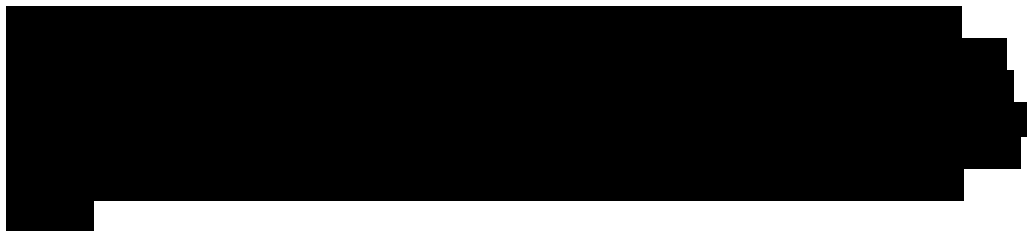
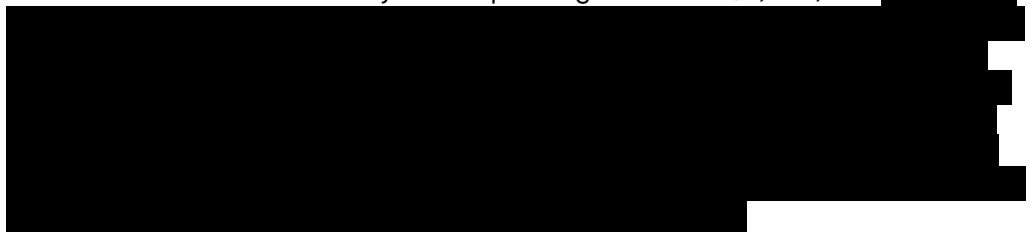


(1) Provide a financial statement setting forth the elements and details of all business transactions connected with your application.

a. Schedule A3-1, below, lists the names of all backers and the amounts they have committed and the amounts already contributed.

Schedule A3-1				
Investor	Capital committed	Capital already paid-in	Capital to be paid upon License	
Kyle Rusconi	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Aaron Ford	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Jack Rubin	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Robert Birnbaum	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Sandra Soule	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Josef Sieghart	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
Andrew Sieghart	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	
	<u>\$ 6,000,000</u>	<u>\$ [REDACTED]</u>	<u>\$ [REDACTED]</u>	

The total amount committed by subscription agreement is \$6,000,000.



1. The location of the proposed production facility;

100 Grist Mill Road
Simsbury, CT 06070



(2) Documents sufficient to establish that:

The applicant is authorized to conduct business in Connecticut and that state and local building, fire and zoning requirements and local ordinances are met for the proposed location of the production facility;

- Organizational Documents
- Letter from Hiram Peck, Simsbury Town Planner
- Letter from William Voelker, former Simsbury Town Planner
- Letter from Prescott Construction Management

SECRETARY OF THE STATE
30 TRINITY STREET
P.O. BOX 150470
HARTFORD, CT 06115-0470

OCTOBER 25, 2013

DAVID O'MEARA
ROBINSON & COLE
280 TRUMBULL STREET
HARTFORD, CT 06103-3597

RE: Acceptance of Business Filing

This letter is to confirm the acceptance of the following business filing:

Business Name:
CURALEAF, LLC

Work Order Number: 2013310114-001
Business Filing Number: 0004968101
Type of Request: ARTICLES OF ORGANIZATION
File Date/Time: OCT 24 2013 04:00 PM
Effective Date/Time:
Work Order Payment Received: 170.00
Payment Received: 170.00
Credit on Account: 7524.00
Customer Id: 000000414
Business Id: 1122163

JENNA NOME
Commercial Recording Division
860-509-6003
WWW.CONCORD.SOTS.CT.GOV

BUSINESS FILING REPORT

WORK ORDER NUMBER:2013310114-001
BUSINESS FILING NUMBER: 0004968101

BUSINESS NAME:

CURALEAF, LLC

BUSINESS LOCATION:

145 DOUBLING ROAD
GREENWICH, CT 06830

MAILING ADDRESS:

145 DOUBLING ROAD
GREENWICH, CT 06830

MEMBER INFORMATION FOR ONE MEMBER:

NAME:ROBERT D. BIRNBAUM
TITLE:MANAGER

** END OF REPORT **



SECRETARY OF THE STATE OF CONNECTICUT

MAILING ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, P.O. BOX 150470, HARTFORD, CT 06115-0470
 DELIVERY ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06106
 PHONE: 860-509-6003 WEBSITE: www.concord-sots.ct.gov

**ARTICLES OF ORGANIZATION
 LIMITED LIABILITY COMPANY - DOMESTIC**

C.G.S. §§34-120; 34-121

USE INK. COMPLETE ALL SECTIONS. PRINT OR TYPE. ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.

<p>FILING PARTY (CONFIRMATION WILL BE SENT TO THIS ADDRESS):</p> <p>NAME: David F. O'Meara</p> <p>ADDRESS: Robinson & Cole LLP 280 Trumbull Street</p> <p>CITY: Hartford</p> <p>STATE: CT ZIP: 06103</p>	<p>FILING FEE: \$120</p> <p>MAKE CHECKS PAYABLE TO "SECRETARY OF THE STATE"</p>
<p>1. NAME OF LIMITED LIABILITY COMPANY - REQUIRED: (MUST INCLUDE BUSINESS DESIGNATION I.E. LLC, L.L.C., ETC.)</p> <p>CURALEAF, LLC</p>	
<p>2. DESCRIPTION OF BUSINESS TO BE TRANSACTED OR PURPOSE TO BE PROMOTED - REQUIRED: ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.</p> <p style="text-align: center;">SEE ATTACHMENT A, ATTACHED HERETO AND MADE A PART HEREOF</p>	
<p>3. LLC'S PRINCIPAL OFFICE ADDRESS - REQUIRED: (NO P.O. BOX) PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE.</p> <p>ADDRESS: 145 DOUBLING ROAD</p> <p>CITY: GREENWICH</p> <p>STATE: CT ZIP: 06830</p>	
<p>4. MAILING ADDRESS, IF DIFFERENT THAN #3: PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE.</p> <p>ADDRESS:</p> <p>CITY:</p> <p>STATE: ZIP:</p>	
<p>5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS - REQUIRED: (COMPLETE A OR B NOT BOTH)</p> <p><input type="checkbox"/> A. IF AGENT IS AN INDIVIDUAL. PRINT OR TYPE FULL LEGAL NAME:</p>	
<p>BUSINESS ADDRESS (P.O. BOX NOT ACCEPTABLE) IF NONE, MUST STATE "NONE"</p> <p>ADDRESS:</p> <p>CITY:</p> <p>STATE:</p> <p>ZIP:</p>	<p>CONNECTICUT RESIDENCE ADDRESS (P.O. BOX NOT ACCEPTABLE)</p> <p>ADDRESS:</p> <p>CITY:</p> <p>STATE:</p> <p>ZIP:</p>
<p>SIGNATURE ACCEPTING APPOINTMENT:</p>	

B. IF AGENT IS A BUSINESS:
PRINT OR TYPE NAME OF BUSINESS AS IT APPEARS ON OUR RECORDS:

C T CORPORATION SYSTEM


CT BUSINESS ADDRESS (P.O. BOX UNACCEPTABLE)

ADDRESS: **ONE CORPORATE CENTER**

CITY: **HARTFORD**

STATE: **CT** ZIP: **06103-3220**

SIGNATURE ACCEPTING APPOINTMENT ON BEHALF OF AGENT:



PRINT NAME & TITLE OF PERSON SIGNING:

AMY BERLETEI
VICE PRESIDENT

6. MANAGER OR MEMBER INFORMATION-REQUIRED: (MUST LIST AT LEAST ONE MANAGER OR MEMBER OF THE LLC.)
 ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.

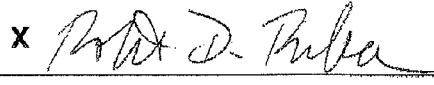
NAME	TITLE	BUSINESS ADDRESS (No. P.O Box) IF NONE, MUST STATE "NONE"	RESIDENCE ADDRESS: (No. P.O Box)
ROBERT D. BIRNBAUM	MANAGER	145 DOUBLING ROAD GREENWICH, CT 06830	145 DOUBLING ROAD GREENWICH, CT 06830

7. MANAGEMENT - PLACE A CHECK NEXT TO THE FOLLOWING STATEMENT ONLY IF IT APPLIES

MANAGEMENT OF THE LIMITED LIABILITY COMPANY SHALL BE VESTED IN A MANAGER OR MANAGERS

8. EXECUTION: (SUBJECT TO PENALTY OF FALSE STATEMENT)

DATED THIS 24th DAY OF October, 2013

NAME OF ORGANIZER (PRINT OR TYPE)	SIGNATURE
Robert D. Birnbaum	X 

AN ANNUAL REPORT WILL BE DUE YEARLY IN THE ANNIVERSARY MONTH THAT THE ENTITY WAS FORMED/REGISTERED AND CAN BE EASILY FILED ONLINE @ www.corpord-sots.ct.gov
 CONTACT YOUR TAX ADVISOR OR THE TAXPAYER SERVICE CENTER AT THE DEPARTMENT OF REVENUE SERVICES AS TO ANY POTENTIAL TAX LIABILITY RELATING TO YOUR BUSINESS, INCLUDING QUESTIONS ABOUT THE BUSINESS ENTITY TAX.
 TAX PAYER SERVICE CENTER: (800) 382-9463 OR (860) 297-5962 OR GO TO www.ct.gov/drs

ATTACHMENT A

ARTICLES OF ORGANIZATION OF CURALEAF, LLC

Item 2. Description of Business to be Transacted or Purpose to be Promoted, continued.

To accomplish any lawful business whatsoever, or which shall at any time appear conducive to or expedient for the protection or benefit of the Company and its assets; to engage in any lawful act or activity for which limited liability companies may be formed under the Connecticut Limited Liability Company Act; and to engage in all activities necessary, customary, convenient, or incident to any of the foregoing.

12525960-v1

Delaware

PAGE 1

The First State

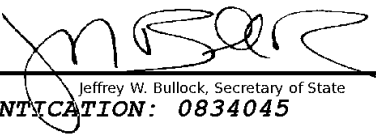
I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "DOUBLING ROAD HOLDINGS, LLC", FILED IN THIS OFFICE ON THE TWENTY-SECOND DAY OF OCTOBER, A.D. 2013, AT 3 O'CLOCK P.M.



5419216 8100

131222260

You may verify this certificate online
at corp.delaware.gov/authver.shtml

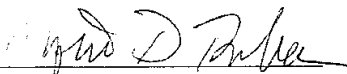

Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 0834045
DATE: 10-22-13

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:03 PM 10/22/2013
FILED 03:00 PM 10/22/2013
SRV 131222260 - 5419216 FILE

CERTIFICATE OF FORMATION
OF
DOUBLING ROAD HOLDINGS, LLC

1. The name of the Limited Liability Company is Doubling Road Holdings, LLC (the "Company").
2. The address of the registered office of the Company in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle, Zip Code 19801. The name of its registered agent at such address is The Corporation Trust Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Doubling Road Holdings, LLC this 22nd day of October, 2013.


Robert D. Birnbaum
Authorized Person

12525947-v1



Town of Simsbury

933 HOPMEADOW STREET

P.O. BOX 495

SIMSBURY, CONNECTICUT 06070

Planning and Land Use Department

November 11, 2013

Attorney Brian Smith
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103

Re: Request Regarding Medical Marijuana Zoning Regulation and property at 100 Grist Mill Road

Dear Attorney Smith:

On October 21, 2013 the Simsbury Zoning Commission, after a duly noticed public hearing and public discussion process, did adopt the attached zoning regulation amendments regarding Licensed Medical Marijuana Dispensaries and Medical Marijuana Production Facilities.

The property at 100 Grist Mill Road (Assessors Map G11 Block 103 Lot 005-25) in Simsbury is located in the I-2, General Industrial Zoning District and thus is eligible for special permit consideration under the above referenced adopted zoning regulation.

If I may provide any other information or assistance regarding this matter, please let me know.

Yours truly,

Hiram W. Peck III, AICP
Director of Planning and Community Development

Enclosure: Adopted Zoning Regulation Revisions

Telephone (860) 658-3245
Facsimile (860) 658-3217

www.simsbury-ct.gov

An Equal Opportunity Employer
8:30 - 7:00 Monday
8:30 - 4:30 Tuesday through Friday

October 22, 2012

**Adopted Regulation pursuant to PA 12-55,
Connecticut General Statutes Sections 21a-408 to 21a-408q inclusive.**

ADD the following Definitions to the existing Zoning Regulations:

ADD to Article Four, Section B:

“Licensed medical marijuana dispensary- a pharmacist licensed pursuant to Chapter 400j of the Connecticut General Statutes, who the Department of Consumer Protection has licensed to acquire, possess, distribute and dispense medical marijuana pursuant to CGS Sections 21a-408 to 21a-408q, inclusive, of ‘An Act Concerning the Palliative Use of Marijuana’ and who is located on the premises of a pharmacy licensed by the Connecticut Commission of Pharmacy.”

“Licensed medical marijuana producer- A person or organization licensed by the Connecticut Department of Consumer Protection as a producer under CGS 21a-408-1 through 21a-408-70, whose purpose is to cultivate marijuana for palliative use, including selling, delivering, transporting and distributing such marijuana, but only to licensed dispensaries under Sections 1 through 15, inclusive of the Act.

ADD to Article Seven, Section E. 6 and Section F. 2.:

2. Licensed medical marijuana dispensary permitted in B-1, B-2 and B-3 zones as a Special Exception use.
3. Licensed medical marijuana dispensary permitted in Simsbury Center Code area where pharmacies are permitted under regulations existing on the date of adoption of this regulation.
4. The dispensing of medical marijuana may only take place on the premises which have been properly permitted to do so and may only be done under the requirements and restrictions of those contained in CGS 21a-408-1 through 21a-408-70.
5. A maximum of two (2) medical marijuana dispensary facilities are permitted within the Town of Simsbury at any time. Any proposal to relocate such a dispensary shall:
 - a. Only be granted upon agreement by the property owner to abandon such use at the original location as verified by notarized affidavit submitted to the Commission, and
 - b. Be the subject of a new special exception application to the Zoning Commission and shall be subject to all applicable standards.

ADD Article Seven, Section J.2.

B. Medical marijuana production facilities may be permitted as a special exception use in the I-1 or I-2 zone. The applicable special exception standards and criteria are as stated in Article Ten, A. 3. provided that all cultivation of medical marijuana plants be conducted indoors and in full compliance with all applicable State of Connecticut laws and regulations.

Adopted by unanimous vote of the Simsbury Zoning Commission on 10/21/13.

William S. Voelker, AICP
243 Prospect Street
Plantsville, CT 06479
Wvoelker1@cox.net 860 620-0780

November 7, 2013

Brian R. Smith, Esq.
Robinson & Cole, LLP
280 Trumbull Street
Hartford, CT 06103-3597

Re: 100 Grist Mill Road, Simsbury, CT

Dear Attorney Smith:

I am writing this in response to your request made on behalf of your client, CuraLeaf, LLC to analyze whether medical marijuana could be produced on the property located at 100 Grist Mill Road, Simsbury, Connecticut.

I am providing this analysis to you as an independent consultant and the views expressed in this letter are my own and are in no way connected to my present position as the Town Planner/Development Coordinator for the town of Cheshire, Connecticut.

I have attached my biography for reference which indicates that I have been a land use professional for 32 years, during which I served as the Town Planner and Director of Community Development for Simsbury from February 1996 until November of 2005, and I am therefore very familiar with Simsbury, its zoning regulations, and the expectations of the Zoning Commission.

For the purpose of this letter, I have reviewed the recently adopted Article Four, Section B that defines licensed medical marijuana producer, and Article Seven, Section J.2 of the Simsbury Zoning Regulations that permits medical marijuana production facilities within Simsbury by special exception, and also Article Ten, Section A.3 of these regulations that list the guidelines for special exceptions.

I have also reviewed the Connecticut General Statutes defining marijuana, including C.G.S. Section 21a-240(7) "Cannabis-type substances", and C.G.S. Section 21c-240(29) "Marijuana", and C.G.S. Section 21c-408 et seq. as well as the Regulations promulgated thereunder by the Connecticut Department of Consumer Protection sections 21a-408-1 to 21a-408-70 of the Regulations of Connecticut State Agencies. I have also reviewed the Simsbury Zoning Map and the Simsbury Tax Assessor's card for 100 Grist Mill Road. This property is 8.82 acres in size, is zoned Industrial 2 (I-2) and contains an existing office building of 40,706 square feet that was constructed in 1989, and has a certificate of occupancy. Based on my knowledge and experience a certificate of occupancy is only issued once the building code and fire code requirements have

been satisfied. Medical marijuana facilities are permitted by special exception in the Industrial 1 (I-1) and Industrial 2 (I-2) zones within Simsbury.

Assuming that CuraLeaf, LLC is or becomes a licensed producer for the purpose of cultivating marijuana under Connecticut Department of Consumer Protection sections 21a-408-1 to 21a-408-70, it may apply for a special exception to operate at 100 Grist Mill Road under Article Seven, Section J.2 of the regulations. Based upon my review of the aforementioned zoning regulations, state statutes and regulations, and other documents, it is my opinion that the building located at 100 Grist Mill Road does, or will with modifications meet all of the requirements set forth within these regulations and that it is logical to conclude that the Simsbury Zoning Commission will approve a special exception for CuraLeaf to produce medical marijuana from this facility.

Very truly yours,

A handwritten signature in cursive script, appearing to read "William S. Voelker".

William S. Voelker, AICP

William S. Voelker AICP
243 Prospect Street
Plantsville, CT 06479
860 620-0780

William S. Voelker is a land use professional with 32 years of experience in the public sector. He is currently Town Planner/Development Coordinator in Cheshire, CT, and has served in this position for the past 8 years. Prior to coming to Cheshire, Bill served as the Director of Planning and Community Development in Simsbury and held that position for nearly 10 years. He also worked for the Naugatuck Valley Development Corporation (NVDC) from July 1994 until February of 1996. He came to the NVDC after serving as the first Town Planner in Berlin, CT for almost 7 years. Bill's remaining experience includes approximately 3.5 years as the Assistant Planning Director in Meriden, and almost 2 years as a Transportation Planner for the Central Connecticut Regional Planning Commission.

He is a member of the American Institute of Certified Planners (AICP), and is an active member of the International Council of Shopping Centers, and the Connecticut Developers Council.

Prescott Construction Management

General Contractor
Construction Management

6 Wilcox Street
Simsbury, CT 06070
(860) 651-4862 Fax (860) 651-3498

October 20, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Harford, CT 06106

Dear Commissioner Rubenstein,

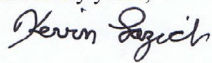
I am writing to confirm that Prescott Construction Management has been retained by Curaleaf to handle the build-out of the facility at 100 Grist Mill Lane in Simsbury CT.

Prescott Construction Management is a full service construction manager located in the center of Simsbury. We have been in business since 1979. Our specialty is landlord/tenant build-outs (please see attached summary reference list.)

We performed the build-out for the owner of the building when they moved-in in 2003. In 2009 we were retained as facilities managers for the property. We are responsible for all maintenance and repairs of the property.

Prescott Construction Management will perform all renovations necessary to retrofit Phase I for Curaleaf's operations. The "team" of subcontractors whom will perform the renovations are all familiar with and have worked at the property in the past. We expect that this work can be completed in 3-4 months once the design and engineering have been completed and the Town of Simsbury Building Department and Fire Marshall approve the building permit application. This schedule will be dictated by the design & lead time for the HVAC equipment.

Sincerely yours,



Kevin Lazich

(3) If the property is not owned by the applicant, provide

A written statement from the property owner and landlord certifying that they have consented to the applicant operating a production facility on the premises;

- Letter of Intent
- Certification

November 5, 2013

Mr. Daniel E. Carpenter
Grist Mill Partners, LLC
100 Grist Mill Road
Simsbury, CT 06070

Re: **Term Sheet By And Between Grist Mill Partners LLC a Delaware LLC--
Landlord ("GMP") and curaleaf LLC a Connecticut LLC--Tenant
("CuraLeaf")**

Dear Mr. Carpenter:

The following business terms describe generally the terms and conditions of the proposed lease with option to purchase the real property and improvements of 100 Grist Mill Road, Simsbury, Connecticut described in a deed recorded at Vol. 743 Page 390 of the Simsbury Land Records. If you agree to these terms, please countersign below and return a copy to me by November 8, 2013.

CuraLeaf is seeking the lease for purposes of producing medical marijuana. As a precondition to entry into the lease with option to purchase, CuraLeaf must seek and obtain a Producer License from the State of Connecticut's Department of Consumer Protection.

As part of the application process, GMP agrees to certify to the State Department of Consumer Protection that it consents to CuraLeaf operating a production facility on the premises as provided in the form attached to this letter.

Provided the foregoing precondition is met, the parties will enter into a lease with option to purchase under the following terms and conditions:

1. The lease shall be for the entire building and the land of 100 Grist Mill Road, Simsbury, Connecticut. See Map G11 Block 103 and Lot 005-25 of the Simsbury Tax Assessor's Records and as more particularly described in Volume 743 Page 390 of the Simsbury Land Records.
2. The initial lease term shall be for five (5) years from the Rent Commencement Date. The Rent Commencement Date shall be that date when all permits and approvals to operate have been granted, and the appeal periods have expired, and the building has been fully vacated. GMP shall have a minimum of three

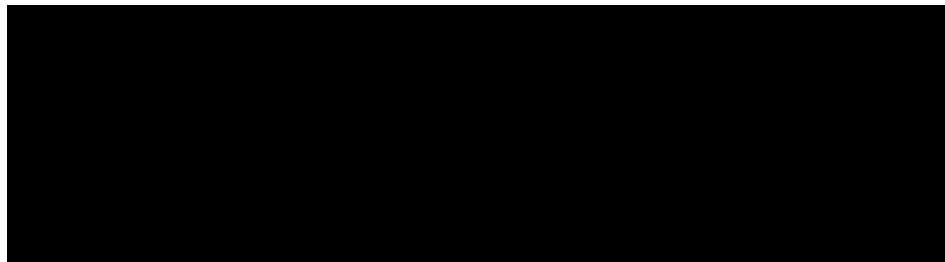
12548393-v2

Mr. Daniel E. Carpenter
November , 2013
Page 2

(3) months but no more than six (6) months to turn over the building and land free of all other tenants or occupants.

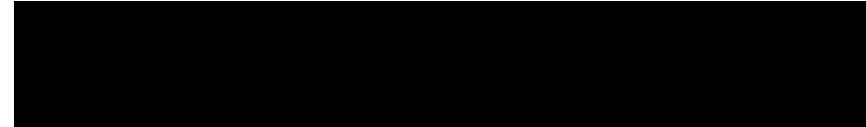
3. There shall be one 5-year renewal option.

4.



5. CuraLeaf shall have an exclusive option to buy the leasehold premises during the term of the Lease for the sum of [REDACTED]. This option may be exercised at any time during the term of the initial lease or renewal upon 30 days prior written notice.

6.



7. The cost of the proposed renovations to the existing building shall be borne solely by CuraLeaf. CuraLeaf shall be responsible for utilities, maintenance and repair but not for replacement of structural items such as the roof, HVAC or foundation.

8. GMP shall pay all real estate taxes as and when due.

9. The parties agree that the lease with option to purchase shall not be subordinate to any mortgage, pledge or hypothecation by GMP and it will take such measures as may be necessary to make the lease superior to any recorded pledges, mortgages, etc. as a precondition of the effectiveness of the lease with option to purchase.

Mr. Daniel E. Carpenter
November 5, 2013
Page 3

10. The parties agree that the lease with purchase option shall be construed in accordance with the laws of the State of Connecticut and shall be binding upon and inure to the benefit of GMP, CuraLeaf and their respective successors and assigns.

Sincerely,

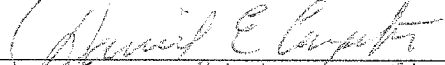
CURALEAF LLC



Robert Birnbaum

AGREED & ACCEPTED THIS 6th DAY OF November, 2013
SUBJECT TO REVIEW AND APPROVAL OF LEASE
WITH OPTION TO PURCHASE

GRIST MILL PARTNERS LLC


Dan Carpenter *Chairman of its managing member*

Date: November 6th, 2013



GRIST MILL CAPITAL LLC

November 6, 2013

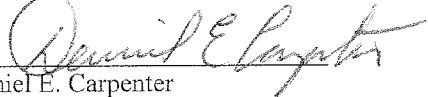
Department of Consumer Protection
Medical Marijuana Program
165 Capitol Avenue, Room 145
Hartford, CT 06106-1630

Re: Landlord Certification Of Its Consent To Permit CuraLeaf, LLC To Operate a Medical
Marijuana Production Facility

To Whom It May Concern:

I, Daniel E. Carpenter, am the Chairman of the Managing Member of Grist Mill Partners, LLC a Delaware Limited Liability Company. Grist Mill Partners, LLC is the owner of real property located at and known as 100 Grist Mill Road, Simsbury, Connecticut. At this location, there exists a large building that CuraLeaf, LLC is proposing to lease for the purpose of allowing it to produce medical marijuana. Grist Mill Partners, LLC hereby certifies that it consents to CuraLeaf, LLC operating a production facility on these premises known as 100 Grist Mill Road, Simsbury, Connecticut, subject to CuraLeaf, LLC receiving necessary state and local approvals.

GRIST MILL PARTNERS LLC

By 
Daniel E. Carpenter
For Its Managing Member

12548621-v2

GRIST MILL PLAZA, 100 GRIST MILL ROAD, SIMSBURY, CT 06070
TEL: 860-408-7000 FAX: 860-408-7015

STATE OF CONNECTICUT)

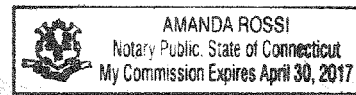
) ss: Simsbury

COUNTY OF HARTFORD)

On this 1st day of November, 2013, before me personally appeared Dan Carpenter, who being duly sworn, did say he is the managing member of Grist Mill Partners, LLC and executed the foregoing certification by his own free act and deed for Grist Mill Partners, LLC.

Notary Public

My Commission Expires: 4/30/17



(4) Any text and graphic materials that will be shown on the exterior of the proposed production facility;

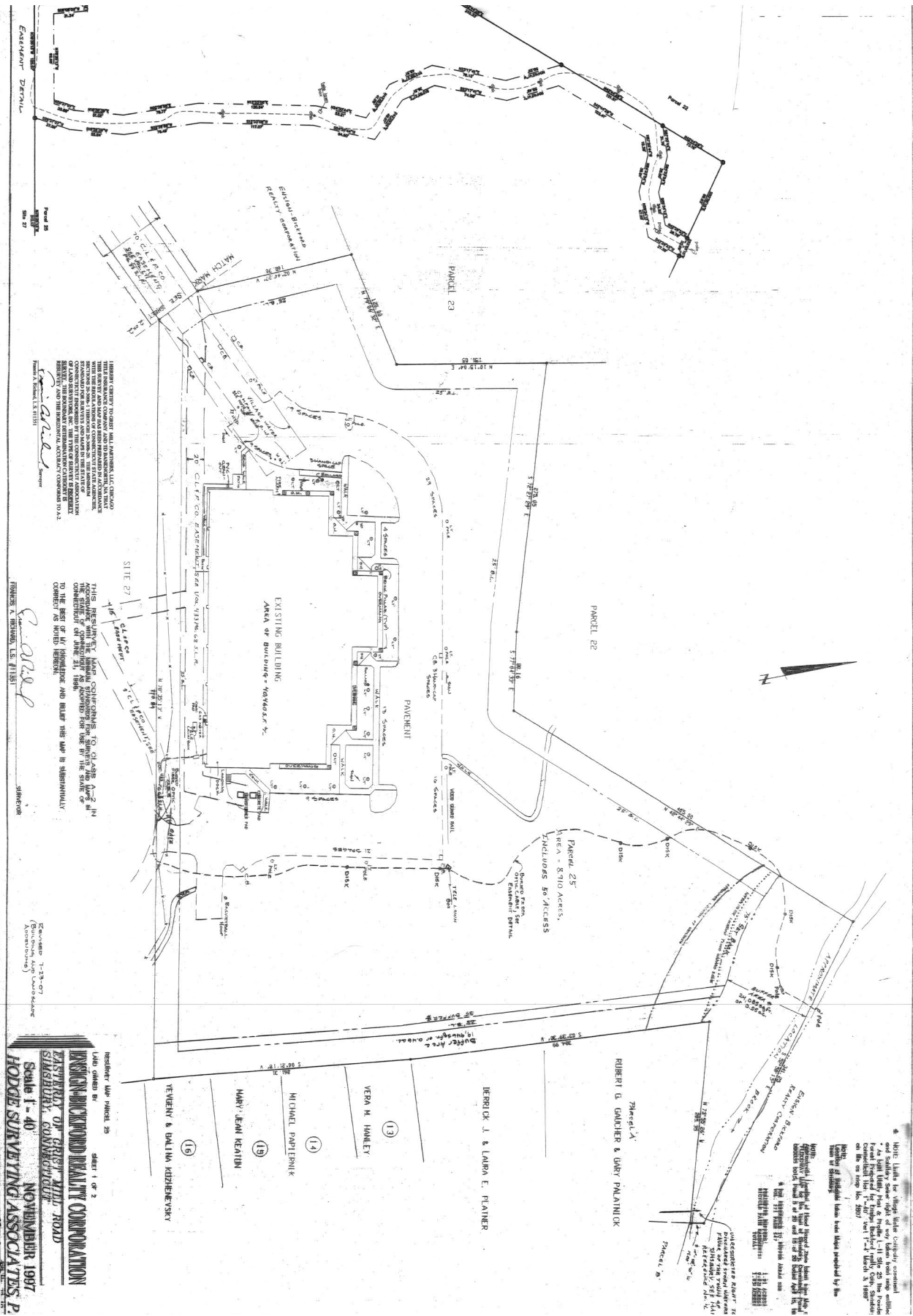


(5) Photographs of the surrounding neighborhood and businesses sufficient to evaluate the proposed production facility's compatibility with commercial or residential structures already constructed, or under construction, within the immediate neighborhood;



(5) Photographs of the surrounding neighborhood and businesses sufficient to evaluate the proposed production facility's compatibility with commercial or residential structures already constructed, or under construction, within the immediate neighborhood;





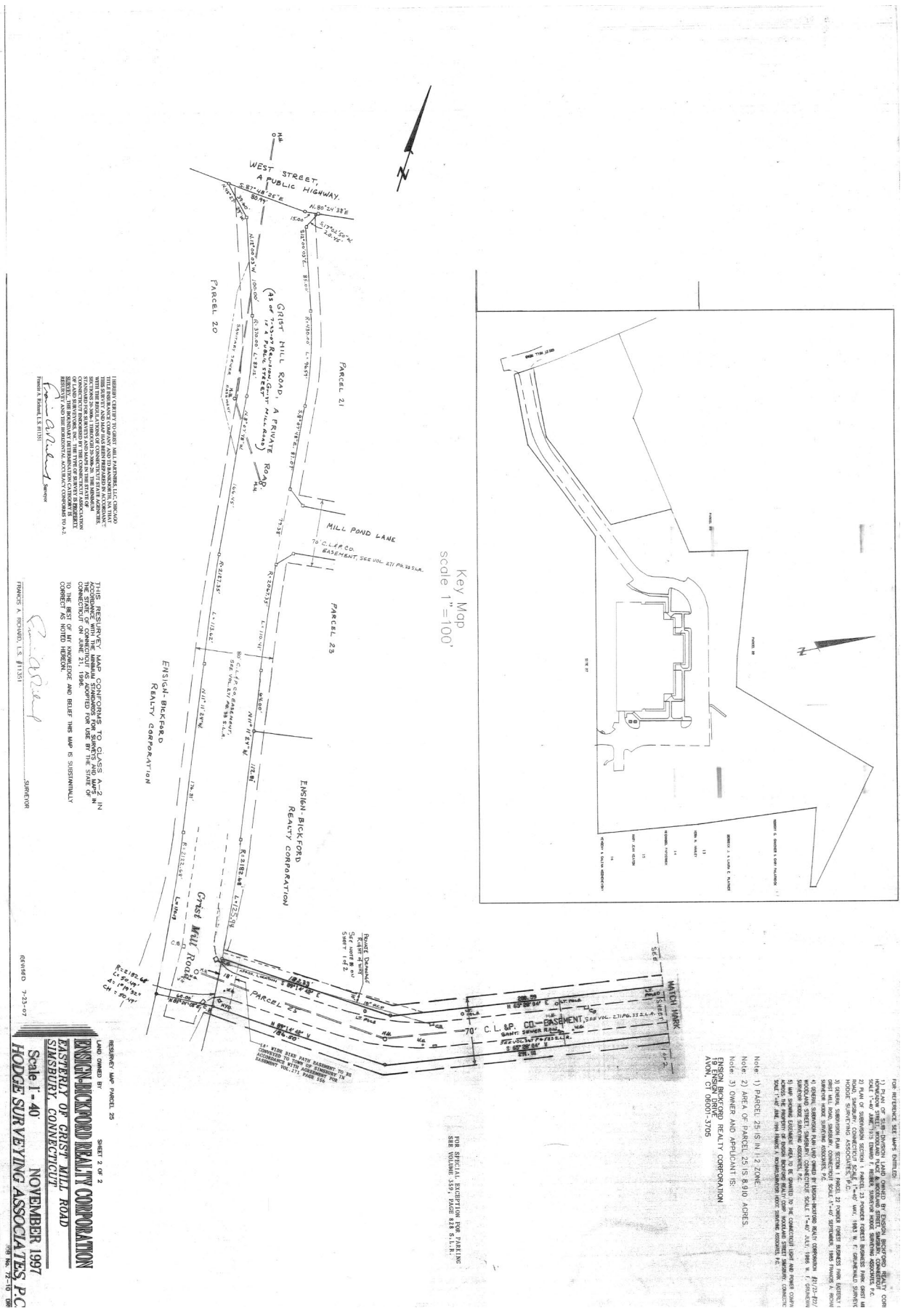
THESE PLANS WERE PREPARED BY THE SURVEYOR AND THE ENGINEER AND ARE NOT TO BE CONSIDERED AS A GUARANTEE OF THE ACCURACY OF THE INFORMATION CONTAINED HEREIN. THE SURVEYOR AND ENGINEER ASSUME NO LIABILITY FOR ANY ERRORS OR OMISSIONS IN THESE PLANS OR FOR ANY DAMAGE TO PERSONS OR PROPERTY ARISING FROM THE USE OF THESE PLANS. THE SURVEYOR AND ENGINEER ASSUME NO LIABILITY FOR ANY ERRORS OR OMISSIONS IN THESE PLANS OR FOR ANY DAMAGE TO PERSONS OR PROPERTY ARISING FROM THE USE OF THESE PLANS.

THIS RESURVEYING WAS CONDUCTED TO CORRECT AN ERROR IN THE SURVEYING RECORD FOR THE BUILDING AND TO CORRECT THE BUILDING FOOTPRINT TO THE BEST OF MY KNOWLEDGE AND BELIEF THIS WORK IS SUBSTANTIALLY CORRECT AS NOTED HEREON.

REVISION 1-13-07
 (As Amended)
 C. R. R. P.
 SURVEYOR

Richard J. R. P. 25
 sheet 1 of 2
ROBINSON ROAD REALTY CORPORATION
PROPERTY OF GARY HILL ROAD
SUBJECT TO CONVEYANCE
 Scale 1" = 40'
 NOVEMBER 1997
HODDER SURVEYING ASSOCIATES P.C.

* NOTE: Little Lee Survey Company, Incorporated, is the owner of the land shown on these plans. The plans were prepared by the Surveyor and Engineer and are not to be considered as a guarantee of the accuracy of the information contained herein. The Surveyor and Engineer assume no liability for any errors or omissions in these plans or for any damage to persons or property arising from the use of these plans.



LIBRARY CERTIFY TO BEST AVAILABLE PRACTICES, CIVIL ENGINEER
 THIS RESURVEY MAP HAS BEEN PREPARED BY A LICENSED
 SURVEYOR AND IS SUBJECT TO THE STANDARDS AND PRACTICES
 GOVERNING THE PROFESSION OF SURVEYING IN THE STATE OF
 CONNECTICUT. THE SURVEYOR'S RESPONSIBILITY IS TO THE
 CLIENT AND NOT TO THE PUBLIC. THE SURVEYOR'S LIABILITY
 IS LIMITED TO THE PROFESSIONAL SERVICES RENDERED BY
 HIMSELF AND HIS EMPLOYEES AND AGENTS. THE SURVEYOR
 DOES NOT WARRANT THE ACCURACY OF THE INFORMATION
 CONTAINED HEREIN.

FRANK A. BICKFORD, L.S. #11351
 SURVEYOR

THIS RESURVEY MAP CONFORMS TO CLASS A-2 IN
 ACCORDANCE WITH THE MINIMUM STANDARDS FOR SURVEYS AND MAPS IN
 CONNECTICUT, AS ADOPTED BY THE BOARD OF SURVEYING AND
 MAPPING ON JUNE 21, 1986. THE SURVEYOR'S LIABILITY IS LIMITED
 TO THE BEST OF HIS KNOWLEDGE AND BELIEF THIS MAP IS SUBSTANTIALLY
 CORRECT AS NOTED HEREON.

FRANK A. BICKFORD, L.S. #11351
 SURVEYOR

REVISED 7-23-07

RESURVEY MAP PARCEL 25
 SHEET 2 OF 2
ENGLISH-BICKFORD REALTY CORPORATION
 TRUSTEES OF GRIST HILL ROAD
 SIMSBURY, CONNECTICUT
 Scale 1" = 40'
 NOVEMBER 1997
HODGE SURVEYING ASSOCIATES, P.C.
 488 HWY. 72-10 066

FOR REFERENCE SEE MAPS NUMBER:
 1) PART OF SUB-DIVISION LAND OWNED BY ENGLISH-BICKFORD REALTY CORP. SCALE 1" = 40' JAN. 1973 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.
 2) MAP OF SUBDIVISION SECTION 1, PARCEL 23 TOWN OF SIMSBURY, HODGE SURVEYING ASSOCIATES, P.C. SCALE 1" = 40' JAN. 1993 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.
 3) CIVIL ENGINEER PLAN SECTION 1, PARCEL 21 TOWN OF SIMSBURY, HODGE SURVEYING ASSOCIATES, P.C. SCALE 1" = 40' JAN. 1993 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.
 4) CIVIL ENGINEER PLAN SECTION 1, PARCEL 22 TOWN OF SIMSBURY, HODGE SURVEYING ASSOCIATES, P.C. SCALE 1" = 40' JAN. 1993 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.
 5) MAP SHOWING SUBDIVISION WITH TO BE DIVIDED TO BE CONVEYED TO THE CONVEYOR AND HIS SUCCESSORS. SCALE 1" = 40' JAN. 1993 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.
 6) CIVIL ENGINEER PLAN SECTION 1, PARCEL 25 TOWN OF SIMSBURY, HODGE SURVEYING ASSOCIATES, P.C. SCALE 1" = 40' JAN. 1993 DRAWN BY HODGE SURVEYING ASSOCIATES, P.C.

Note 1) PARCEL 25 IS IN L2 ZONE.
 Note 2) AREA OF PARCEL 25 IS 8.910 ACRES.
 Note 3) OWNER AND APPLICANT IS:
ENGLISH-BICKFORD REALTY CORPORATION
 AVON, CT 06001-3705

NON OFFICIAL REPRODUCTION FOR PARTIAL
 SETS WILLING: 1551, PAGE 823 S.L.L.T.



Site/ Survey Assessment

Existing Property Located at

100 Grist Mill Road
Simsbury, Connecticut

Prepared for: CuraLeaf, LLC
145 Doubling Road
Greenwich, CT 06830

Prepared By: Hodge, LLC
1783 Farmington Avenue
Unionville, CT 06085

Dated: October 31, 2013

1783 Farmington Avenue Unionville, CT 06085 | PH: 860.673.0444 | FAX: 860.675.7429
www.hodgellc.com



INTRODUCTION:

Hodge, LLC has been retained by the CuraLeaf, LLC to prepare an assessment in order to verify if any measurable improvements exist on the site other than those depicted on a map entitled "GENERAL SUBDIVISION PLAN SECTION 1 PARCEL 25 SHEET 1 OF 2 POWDER FOREST BUSINESS PARK EASTERLY OF GRIST MILL ROAD - SIMSBURY, CONNECTICUT SCALE 1"=40' OCTOBER 1997 HODGE SURVEYING ASSOCIATES, P.C." (herein referred to as "MAP"). The assessment was to include research forward from the date of the before-mentioned map to determine the alteration to the overall boundary or the release or conveyance of additional easements. The findings in this assessment are based on field review of 100 Grist Mill, review of existing mapping and town hall research, and are not based on actual field survey and/or engineering calculations. Field survey and engineering calculations are not included in the scope of this assessment.

SITE/ SURVEY ASSESSMENT:

Site Inspection Completed: October 30, 2013

The existing "MAP" depicts the majority of the site improvements. There are smaller detail improvements such as light poles, walk lights, yard drains, signs, miscellaneous utility structures and walks that do not appear on the survey. The existing building (externally) appears to be depicted as on the survey. The area labeled as future parking on the "Map" has not been built.

Town Hall Research Completed: October 30, 2013

The boundary lines for 100 Grist Mill Lane as depicted on the "MAP" is constant with the Metes and Bounds description found in schedule A of warranty deed (v.743/p.390-393) received for record at Simsbury, CT on 08/30/2007. The deed refers to a map entitled "RESURVEY MAP OF PARCEL 25 LAND OWNED BY ENSIGN-BICKFORD REALTY CORPORATION EASTERLY OF GRIST MILL ROAD SIMSBURY, CONNECTICUT SCALE 1"=40' NOVEMBER 1997 HODGE SURVEYING ASSOCIATES, P.C. SHEET 2 of 2" and is consistent with the "MAP". This map is on file (#3800). The deed and "MAP" list the same encumbrances along with prior rights of others as set forth in the Declaration of Easements, Covenants and Restrictions. One encumbrance not depicted on the "MAP" is a "Communication Trench Easement" found in v.743/p.394-397, received for record at Simsbury, CT on 08/30/2007. The easement is described in exhibit B of before-mentioned deed and refers to a map entitled "RESURVEY MAP OF PARCEL 25 LAND OWNED BY ENSIGN-BICKFORD REALTY CORPORATION EASTERLY OF GRIST MILL ROAD SIMSBURY, CONNECTICUT SCALE 1"=40' NOVEMBER 1997 HODGE SURVEYING ASSOCIATES, P.C. SHEET 2 of 2".



CONCLUSION:

Based on our site observations and Town Hall research the map entitled: "GENERAL SUBDIVISION PLAN SECTION 1 PARCEL 25 SHEET 1 OF 2 POWDER FOREST BUSINESS PARK EASTERLY OF GRIST MILL ROAD - SIMSBURY, CONNECTICUT SCALE 1"=40' OCTOBER 1997 HODGE SURVEYING ASSOCIATES, P.C." would not be the map that properly depicts the current site improvements nor the encumbrances on the property. If possible the map entitled "RESURVEY MAP OF PARCEL 25 LAND OWNED BY ENSIGN-BICKFORD REALTY CORPORATION EASTERLY OF GRIST MILL ROAD SIMSBURY, CONNECTICUT SCALE 1"=40' NOVEMBER 1997 HODGE SURVEYING ASSOCIATES, P.C. SHEET 2 of 2" should be utilized with a recommendation for a complete titled search as well as an updated Class "A-2" boundary to be completed in the near future.

(7) A map that identifies all places used primarily for religious worship, public or private school, convent, charitable institution, whether supported by private or public funds, hospital or veterans' home or any camp or military establishment that are within 1000 feet of the proposed production facility location; and

- There are no such places within the 1000 foot radius.



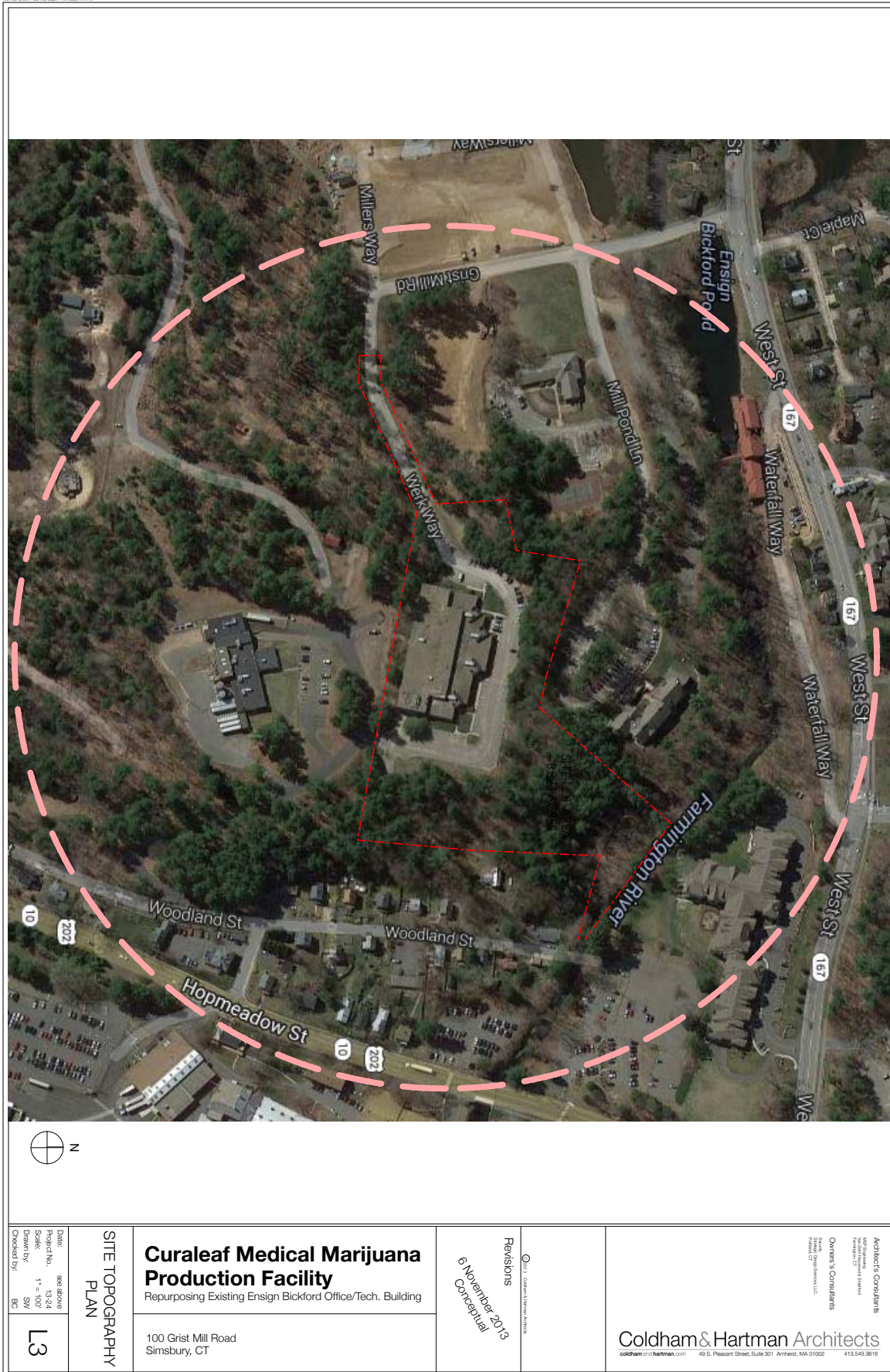
LOCUS PLAN
SCALE: 1" = 100'

Curaleaf Medical Marijuana Production Facility
Repurposing Existing Ensign Bickford Office/Tech. Building

100 Grist Mill Road
Simsbury, CT

Revisions
6 November 2013
Conceptual

Coldham & Hartman Architects
Architect's Consultants
49 S. Pleasant Street, Suite 301
Amherst, MA 01002
413.549.3616



SITE TOPOGRAPHY PLAN

Date: 06/08/2016
 Project No.: 11-13124
 Scale: 1" = 50'
 Drawn by: BC
 Checked by: BC

L3

Curaleaf Medical Marijuana Production Facility
 Repurposing Existing Ensign Bickford Office/Tech. Building

100 Grist Mill Road
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Revisions
 6 November 2013
 Conceptual

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 Architects & Consultants
 49 S. Pleasant Street, Suite 301
 Amherst, MA 01002
 413.549.3616

(8) A blueprint, or floor plan drawn to scale, of the proposed production facility, which shall, at a minimum, show and identify the following:

- a. The location and square footage of the area where marijuana is to be grown;
- b. The square footage of the areas where marijuana is to be harvested;
- c. The square footage of the areas where marijuana is to be packaged and labeled;
- d. The square footage of the areas where marijuana is to be produced and manufactured;
- e. The square footage of the overall production facility;
- f. The square footage and location of areas to be used as storerooms or stock-rooms;
- g. The location of any approved safes or approved vaults that are to be used to store marijuana;
- h. The location of the toilet facilities;
- i. The location of all break rooms and personal belonging lockers; and
- j. The locations of all areas that may contain marijuana or marijuana products that shows walls, partitions, counters and all areas of ingress and egress.
- Said diagram shall also reflect all production, propagation, vegetation, flowering, harvesting, storage and manufacturing areas.

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Curaleaf
Pure Medical Cannabis

The contents of this plan are confidential and are not to be reproduced with
express written consent except as required by law.

Introduction

Curaleaf is a Connecticut Limited Liability company formed to cultivate pharmaceutical grade cannabis and manufacture cannabis products in the state of Connecticut. The cultivation facility is located at 100 Grist Mill Road in Simsbury, Connecticut.

Curaleaf presents an outstanding combination of:

- Vision
- Expertise and experience
- Management depth
- Financial strength

Curaleaf is well-qualified to be granted a license as a producer of medical cannabis.

Curaleaf is characterized by:

- Leadership by a medical professional and patient advocate focused on education.
- Assembled team of the most respected medical and scientific experts in the medical cannabis community.
- Commitment to produce medicine.
- Active involvement with multiple levels of Connecticut government contributing to the development of Connecticut's regulations.
- Compelling personal and professional experiences of Curaleaf's principals regarding the appropriate medical use of cannabis and its efficacy.
- Experts on the cutting edge of pharmaceutical, agricultural and plant processing technology.
- Proven technology and expertise in growing and extracting.
- Strong financial backing largely from longtime Connecticut residents.
- Experienced business management with a history of entrepreneurship and successfully "nurturing" start-ups and managing them successfully.
- Compliance and controls orientation.
- Financial and operational support for local Substance Abuse Programs and Community Benefit Programs.
- Research and Development programs conducted at our facility by both internal and external researchers.
- Creation of a "corporate culture" that strives to develop healthy and happy employees.

Vision	Curaleaf will strive to unlock the full therapeutic potential of cannabis through scientific research and pharmaceutical grade production with a commitment to regulatory compliance and sustainability.
Mission Statement	The Curaleaf mission is to produce pharmaceutical grade, standardized dose medical cannabis, for use by an educated medical and patient community to improve health, well-being and quality of life.
The People Behind Curaleaf	<p>Eileen Konieczny, President and Chief Visionary, is a Professional Registered nurse with more than twenty years of experience in oncology. She is also board member of the American Cannabis Nurses Association and formerly Executive Director of the Connecticut Cannabis Business Alliance. Eileen actively educated Connecticut legislators during the creation and passage of the Connecticut medical marijuana bill and also contributed to the Department of Consumer Protection's formulation of the regulations. Her excellent reputation in the medical cannabis community has inspired the most respected medical, cultivation and scientific experts in the industry to join the Curaleaf team.</p> <p>April Arrasate, Chief Operating Officer, is a Connecticut attorney with a background in pharmaceutical research and development. April lost her mother to breast cancer in 2011 and has since transitioned into the realm of patient advocacy, using her pharmaceutical background to explore patient options in new medicines.</p> <p>Robert Birnbaum, Chief Executive Officer is a dynamic financial expert with a strong history in compliance and regulated environments. Robert has successfully managed both large and small organizations in addition to founding a successful start-up and has the experience necessary to ramp up and oversee the Curaleaf organization.</p> <p>The Curaleaf investors are largely longtime Connecticut residents using their own funds. In addition to being upstanding and well respected members of the community, they bring broad business experience and management skills to the venture. Curaleaf has the financial strength to fulfill its mission as envisioned by the state. Curaleaf has \$6 million committed capital, including \$2 million in cash [REDACTED]</p> <p>As evidence of this strength, our balance sheet already shows assets of just over \$6 million, including \$2 million in cash immediately available to meet the State's requirements upon granting of license. More financial resources are available if required as the business develops.</p>

Location The Curaleaf production facility is located in the former world headquarters building of Ensign Bickford Aerospace & Defense, a global leader of precision energetics systems and innovative explosive solutions. Because the building was designed for high tech manufacture, it is equipped with desirable characteristics such as clean rooms, extensive power and HVAC systems, industrial chillers and an inherently secure design and location. It is located in an industrial zone, which is consistent with the local zoning requirements for the production of medical marijuana in the town of Simsbury. We anticipate investing over \$1 million in remodeling and new security systems for the building, in addition to the equipment required for production.

Production Expectations Based on the superior characteristics of the facility and the industry expertise of the Curaleaf cultivation and extraction team, Curaleaf will be able to cost-effectively meet both short-term and long-term patient demand.

Phase 1 of our production plan [REDACTED]

Phase II build out will [REDACTED]

Markets and Products The Curaleaf product line is guided by three main principles; organic cultivation of source product, standardized dosing that utilizes targeted delivery systems and familiar forms of pharmaceutical consumption.

Organic Cultivation Each genetic strain to be cultivated has been specifically chosen to yield the types and combinations of active compound that research indicates will best address the needs of the eligible patient community. The raw material product will be grown using organic methods, as defined by the state of Connecticut in §21a-92(19) of the Connecticut General Statutes. Each strain will be homogenized and tested in Curaleaf’s own in-house testing facility and by an independent state approved laboratory such that the patient is aware of the exact makeup of the particular strain.

Standardized Dosing

[REDACTED]

[REDACTED]

[REDACTED]

Familiar forms of consumption Curaleaf is committed to providing patients with familiar forms of medicine such as capsules, sublingual tabs, inhalers, creams and raw material that can be consumed by vaporization as well as “medibles.” Curaleaf understands the medical and patient community concern about smoking a pharmaceutical. Curaleaf has obtained technology, techniques and intellectual property that can ultimately eliminate the need to smoke the product. The research and development initiatives of Curaleaf seek to deepen understanding of the usefulness of various cannabinoids and optimal methods of delivery.

Financial Strength and Management Depth

Funding is provided by seven individuals, six long time Connecticut residents, one from Westchester County, using their own resources. Documentation provided verifies the ability to meet all capital commitments. These individuals have broad business experience, include managing large and small organizations, manufacturing, entrepreneurship, venture capital, real estate and private equity. Several have served on Boards of successful startups. One of this group will take an active day-to-day role in management as CEO, others will serve on Curaleaf's Board. They provide the business experience and financial strength to enable Curaleaf to fulfill its mission successfully.

- 6 million committed capital.
- \$2 million in cash held ready [REDACTED] to satisfy the state's escrow requirement. .
- [REDACTED]
- Initial operating cash more than sufficient to carry Curaleaf until it becomes cash-positive.
- Additional resources can be provided if necessary.

Objectives

Overall, Curaleaf is modeled after a small pharmaceutical company. We aim to serve patients with legitimate medical needs, not recreational marijuana users. We will make products that are familiar to patients, in the form of pills, inhalers, sublinguals and topicals. Our objective is to be the premier provider of pharmaceutical grade medical cannabis, in standardized doses, delivered through vehicles that do not necessarily require smoking.

Specifically, Curaleaf has set the following objectives for the first two years of operations:

1. Build an advanced cultivation & extraction facility, based on proven technology to meet the needs of the eligible patient community.
2. Increase production capacity at a steady pace adequate to meet patient demand.
3. Educate the medical and patient community regarding the benefits of medical cannabis, raising awareness, comfort level, and knowledge of the appropriate use of medical cannabis.
4. Fund research on the use of medical cannabis as an additional available option for recommending physicians and eligible patients.
5. Provide additional community benefits through support of substance abuse programs, local community benefit programs, and compassionate care programs.
6. Create a strong compliance culture.
7. Hire locally.

Introduction

Curaleaf will have the capacity to manufacture a wide range of unadulterated products made with pure marijuana in the form of raw material, cigarettes, extracts, sprays, tinctures, topical applications, oils, lotions, transdermal patches, baked goods, capsules and pills. [REDACTED]

In creating the line, Curaleaf specifically created products that provide maximum value to the eligible patient population in a manner consistent with generally accepted pharmaceutical forms. In every step of product development, Curaleaf avoids any factors, whether in brand name, product form, packaging or labeling, that encourages the recreational use of our products.

The product line is defined by varying characteristics

Strain Type:

[REDACTED]

Active Ingredient Ratio:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dose: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Advantages

Low dosing of psychoactive compounds

[REDACTED]

Efficacy & Safety

Curaleaf products will be preferred in the pharmaceutical market due to efficacy and safety. The ability to provide potent medicine without the accompanying side effects prevalent in today’s pharmaceutical marketplace is valuable to both physicians and patients and will ultimately drive acceptance of medical cannabis. Unlike other pharmaceuticals, the side effects of cannabinoid compounds are relatively mild so that delivery in high doses does not pose a significant risk. Not a single documented case of a fatal overdose of cannabis exists. (US Department of Justice, Drug Enforcement Administration, “In the Matter of Marijuana Rescheduling Petition” (Docket #86-22), September 6, 1988) In addition, the reported side effects of cannabis are temporary and non-lethal.

Pharmaceutical Standards

Curaleaf products stand apart from the available products in the cannabis marketplace because every step of each product is handled and engineered as a pharmaceutical. [REDACTED]

Genuine Patient Focus

The founders of Curaleaf were motivated to form this company to ensure quality options for patients who are not interested in the recreational drug market. Our products embrace Connecticut’s medicinal regulations rather than subvert them. That commitment will create confident and continued consumers of Curaleaf products.

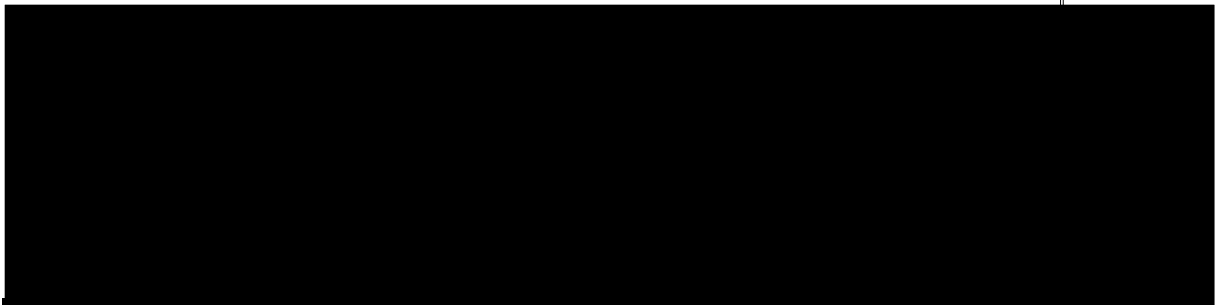
Introduction

The Curaleaf state-of-the-art cultivation and extraction facility features separate clean rooms for drying and processing in laboratory settings. Plans to modify the existing building have been developed by our architect and engineer to the specifications of our expert cultivation team.



The operation has been specifically designed to create optimum logistical and production flow in a secure and safe environment where all areas in the facility are compartmentalized based on function and access between areas is restricted to ensure that only employees necessary for a production function have access to that portion of the production facility.

Production Facility Plan



<small>© 2013 Curaleaf & Partner Architects</small>	
Revisions	
<i>6 November 2013 Conceptual</i>	
Curaleaf Medical Marijuana Production Facility	<small>Repurposing Existing Ensign Blockford Office/Tech. Building 100 Great Mill Road Simsbury, CT</small>
FIRST FLOOR PLAN	
<small>Date: see above Project No. 13-24 Scale: Drawn by: SW Checked by: BC</small>	A1.1

Cultivation

The cultivation team consists of experts in large scale production of medical cannabis, farming, indoor grow equipment and cannabis cultivation.

The team has devised a cultivation protocol that will use the most sustainable practices to maximize the health, safety, quality and yield of medicine. [REDACTED]

The standard operating procedures for cultivation as well as the integrated pest management system and the overarching best practices for producing a plant free of mold, disease and heavy metals, are outlined in the Curaleaf Best Practices and Procedures Manual attached hereto.

Cultivation

Jason Cranford - Chief Botanist Consultant
Boulder, Colorado

Jason Cranford has been a specialist in horticultural sciences for over twenty five years. He is one of the top horticultural scientists in the United States and has proven himself time and again as one of the leading experts in the cultivation of naturopathic and botanical medicaments.

Jason is an expert in the sequencing of hybrid cannabis taxa and variants. He was awarded the prestigious Cannabis Cup, specifically to entries of cannabidiol (CBD) producing phenotypes.

Jason Cranford's award winning specimen was an organically produced cannabis phenotype, hybridized over a three year period and tested with a certificate of analysis recording the highest yielding organic CBD (cannabidiol) yield known to date at over 34%.

Jason has extensive experience in the design, construction, operation and establishment of agricultural farms, including the cultivation of organic, non-pesticide medical cannabis. He is also a seasoned owner and operator of a large scale production and dispensary facility in Colorado named Rifle Mountain.

Jason is the inventor of Cannatol™, a phyto-medical compound, derived principally from a highly standardized, consistent and high yielding organic cannabidiol phyto stock, free from pesticide and mold contaminants.

Curaleaf has contracted with Jason after interviewing scores of cultivation experts and concluding that Jason has the most advanced knowledge of genetics, cultivation and large scale production available in the industry.

Cultivation

Joseph Stevens - Production Consultant/ Chief Compliance Officer
Montclair, NJ

Joseph Stevens, Curaleaf's Compliance Officer, is the founder of Greenleaf Compassion Center, New Jersey's first and only operational medical marijuana alternative treatment center (ATC) in the state.

New Jersey was the first state to enact highly regulated regulations including strong governmental oversight. Greenleaf Compassion Center was the only ATC able to pass the rigorous and extremely restrictive Department of Health requirements.

In his role as CEO and President, Joseph took a hands on approach to building the organization and personally planned, implemented, and participated on a daily basis in all aspects of the cultivation facility.

He has several years' experience cultivating pharmaceutical grade marijuana from seed to sale. The product is required to be State laboratory tested for heavy metals, microbiological contaminants, mycotoxins, and pesticides. All of Greenleaf's harvests passed these tests without issue.

Joseph designed a hybrid soil/hydroponic 5000 sq. foot facility utilizing high pressure sodium lighting. Plant nourishment is exclusively organic. The grow contains only female plants and mother plants are consistently maintained for cloning to ensure consistent, quality production.

Joseph worked directly with the Department of Health and the State laboratory to establish testing procedures that would guarantee safe and organic patient medication.

Cultivation

Colin Coogan – Cultivation Consultant
Stamford, Connecticut

Colin Coogan is owner and operator of CT Roots and Greenup Group.

CT Roots is Connecticut's premier indoor growing supply store and garden center. As owner and operator, Colin is well versed in all indoor gardening needs, including the latest state of the art equipment.

Green Up provides consultation, design, installation and maintenance of a variety of plant-based products and systems that showcase the aesthetic and environmental benefits of green technology

These two operations demonstrate the breadth of Colin's experience in using sustainable, green technology to achieve the best indoor grow environments possible.

Curaleaf has associated Colin as an expert in these fields, but also as a means of locally sourcing our equipment needs.

Cultivation

Renee Giroux – Organic Horticulturalist Consultant
Watertown, Connecticut

Renee Giroux is the master grower at Gilbertie's Herbs Gardens Inc. since 2008.

Renee certified the largest organic greenhouse system in New England. She farms the largest herb selection in the country.

Renee has developed biosphere growing techniques for greenhouse systems as well as developed a Hazardous Analysis and Critical Grow Protocol (HAACP) for cut herb and vegetable production through SCS Global. HAACP is a preventative food sytem that aims to reduce the risk of hazardous materials getting into food products.

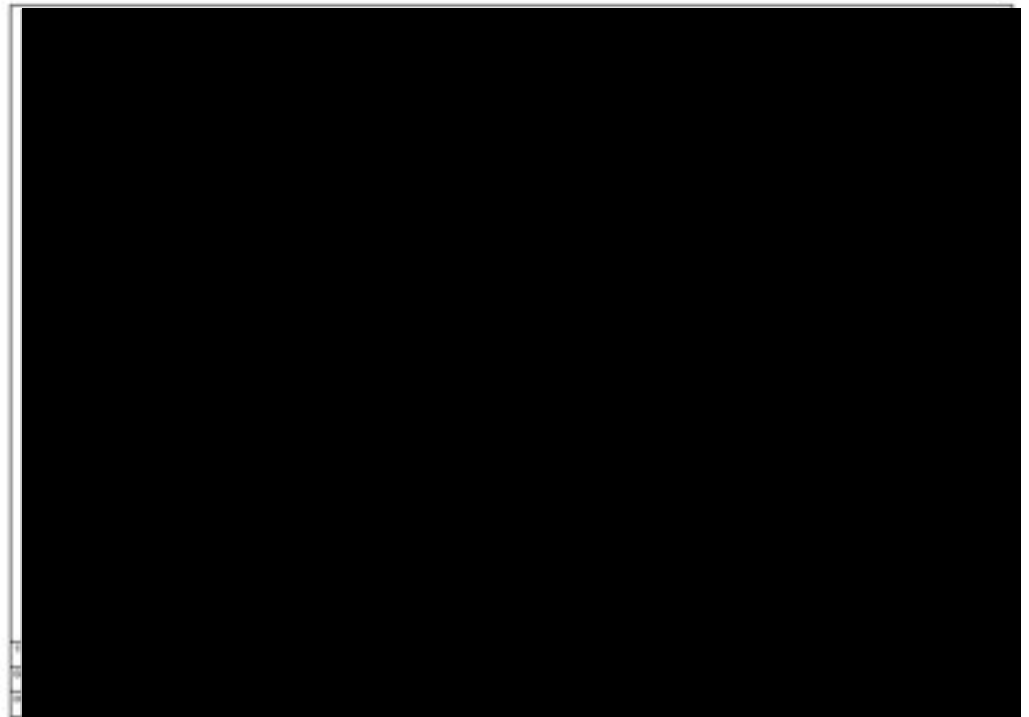
Renee has developed proprietary fertilizers, growing plans and propagation techniques.

She has also received grants through USDA and FDA programs, as well as registered pure organic strains of liquids for control of pests.

Clean Room



Clean Room Plan



Extraction & Infusion

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Our Competitive Advantage

[Redacted]

[Redacted]

Super Critical Fluid Extraction (“SFE”)

[Redacted]

Supercritical Fluid Impregnation (“SFI”)

[Redacted]

SFE Technology Competition

[Redacted]

[Redacted]

In-House Testing

All Curaleaf products will be tested as required by the DCP regulations 21a-57 through 59, by a third-party laboratory. However as part of our commitment to a pharmaceutical grade, standardized dose product, Curaleaf will invest in the high pressure liquid chromatography and gas chromatography equipment necessary to perform both qualitative and quantitative analysis of its raw material and processed product. Descriptions of these processes can be found in the attached Curaleaf Best Practices and Procedures.

Commercial Kitchen

Any area in the production facility where marijuana will be manufactured into an edible form will comply with the Connecticut Food, Drug and Cosmetic Act of the Connecticut General Statutes, 21a-91 to 21a-120 and sections 21a-151 to 21a-159 inclusive regarding bakeries and food manufacturing (21a-408-53). In an effort to raise the bar, Curaleaf will house the commercial kitchen in a clean room environment. Specifications of the commercial kitchen are attached hereto in the Curaleaf Best Practices and Procedures.

Air Treatment System

Curaleaf is committed to a reduction or elimination of offsite odor. To that end, we have

[REDACTED]

Cultivation Room

[REDACTED]

Clean Room

[REDACTED]

Exits and Entry Way

[REDACTED]

Homogenization

Homogenization under the Connecticut Regulations requires the ingredients to be processed to a uniform globule or particle size. [REDACTED]

Packaging

Curaleaf is committed to using packaging that is light resistant, child-resistant and not capable of containing more than a one month's supply (2.5oz) of medical marijuana in accordance with DCP regulation 21a-408-56 and the Poison Prevention Packaging Act of 1970, 16 CFR 1700.1(b)(4), incorporated therein.



Minimum Requirements

- Curaleaf shall individually package, label and seal marijuana products in unit sizes such that no single unit contains more than a one-month supply of marijuana.
- Curaleaf shall place any product containing marijuana in a child-resistant and light-resistant package.
- The term “Child Resistant” shall be satisfied only if the packaging is designed or constructed to be significantly difficult for children under 5 years of age to open or obtain a toxic or harmful amount of the substance contained therein within a reasonable time and not difficult for normal adults to use properly, but does not mean packaging which all such children cannot open or obtain a toxic or harmful amount within a reasonable time. 16 CFR 1700.1(6)(4).

Labeling

The Curaleaf label was designed in strict compliance to DCP regulation 21a-408-56. [REDACTED]

[REDACTED]

[REDACTED]

Watermark Example



[REDACTED]

Pricing Strategy



For further information please see Section VIII of the business plan.

Introduction

Curaleaf is an entity with social consciousness and is committed to being a respected and active participant in the community on an individual, state, and local level.

Community Support

Curaleaf has and will continue to secure the support of the community of Simsbury, CT. Attached are letters of support from:

- State Senator Kevin Witkos (R)
- Simsbury Chief of Police Peter Ingvertson
- Doug Banfelder, Premier Southwest Insurance Group

State Senator Kevin Witkos (R)

Kevin D. Witkos

November 8, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Harford, CT 06106

Dear Commissioner Rubenstein,

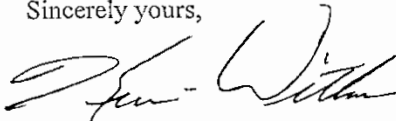
I am writing to you as a proponent of the use of medical marijuana and supporter of the recent legislation allowing Connecticut to license certain growers to cultivate the cannabis to be used for such palliative purposes. I have come to know personally several members of the Curaleaf Group, and would heartily endorse them as being the type of group that could efficiently, responsibly, and professionally deliver the necessary product for use by state residents suffering from debilitating diseases. I am truly confident that the Curaleaf vision and mission rises to the level of what the bill intended.

Curaleaf consists of legal and medical professionals who are patient advocates and who intend to provide standardized doses of legally compliant forms of medicine for qualifying patients. I have seen their business plan presentation and I believe they have pulled together a team of agricultural, production and science experts to accomplish this task. I am confident Curaleaf has Connecticut's qualifying patients' best interests in mind and is committed to discouraging the recreational use of marijuana.

I know April Arrasate as we are both small business owners in the town of Canton where she has been an active participant in community affairs. I believe that as Chief Operating Officer of Curaleaf she will continue to be active in the community and be an overall benefit to our citizens.

Once again, I strongly support any licensure application for Curaleaf, and believe that granting them such approval will be in the best interests of the state, its residents, and in keeping with the spirit and letter of the law. Thank you in advance for considering my opinion in this matter, and please feel free to contact me if you should have any additional questions or concerns.

Sincerely yours,



Kevin Witkos

phone: 860-693-3985 | cell 860-221-5162 | 15 High Ledge Rd, Canton, CT 06019 | Witkos@comcast.net

Simsbury Chief of Police Peter Ingvertson

Simsbury Police Department

933 Hopmeadow Street P.O. Box 495 Simsbury, CT 06070



PETER N. INGVERTSEN

CHIEF OF POLICE

October 30, 2013

Commissioner William M. Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Hartford, Connecticut 06106-1630

Dear Commissioner Rubenstein:

I am writing to inform you of my knowledge of the organization *curaleaf*, llc, a group seeking a medical marijuana production license in the Town of Simsbury, Connecticut.

I have spoken with *curaleaf* COO, April Arrasate, and she has informed me of the mission, the history and the experience behind the *curaleaf* group. April Arrasate is an attorney in the State of Connecticut with a background in pharmaceutical research. More notably she is the daughter of an acquaintance of mine, Dr. Leo Veleas, who I know to have lost his wife, Rachel, to breast cancer in February of 2011. The loss of Rachel changed the course of April's life such that she has since become a patient advocate. That path has culminated in this organization as a means to expand the pharmaceutical options available to critically ill patients. Based on my knowledge of this history, I believe that the *curaleaf* group is truly interested in medical marijuana as a pharmaceutical and not as a path to recreational use.

As I do not live in Simsbury, I cannot represent the community. However, I can relay that the Town's Zoning Board, after hearing from *curaleaf* on the issue, voted unanimously to allow for the operation of a medical marijuana cultivation facility by special permit in the Town of Simsbury.

I am writing solely to inform the Department of Consumer Protection that April Arrasate, as COO of *curaleaf*, has reached out to me as the Simsbury Police Chief, and asked me to work alongside *curaleaf* in ensuring proper security measures, avoidance of theft and diversion, and proper transport methods.

Doug Banfelder
Premier Southwest Insurance



Cure a Leaf LLC - Plan to obtain General Liability Insurance

Our agency founded its medical marijuana specialty division, Premier Dispensary Insurance, in 2011 after passage of Arizona's Proposition 203 enabled creation of the Arizona Medical Marijuana Act. I market only to state-licensed marijuana business owners, and find the people entering this emerging industry are credible, reputable people from the business, medical and legal professions – precisely the types of individuals who will honor the trust given them by their state and local communities.

Applicant has spoken at length with this agency to obtain a General Liability policy tailored specifically to the unique needs of medical marijuana businesses, provided by Lloyd's of London.

These policies provide significant protection to both business owners and the communities they operate in. The various safety, security and patient health exposures have been very carefully addressed by our carrier's underwriters. Following are a few examples:

Strict underwriting criteria designed to prevent loss by either theft or diversion, such as requiring security measures to deter and prevent unauthorized entrance into areas containing marijuana. One operational feature the carrier has found effective and thus requires is a "double entry", typically achieved with a medical office-style waiting room separating patients from the marijuana by way of a locked, "buzz-in" door controlled by dispensary staff.

Another means of theft prevention Lloyd's mandates is a safe of 800lb minimum weight, 1 hour or greater fire rating, that must be bolted to the floor. Safes of 2000lbs or more with a 1 hour or greater fire rating and bolted to the floor qualify the insured for a premium credit.

An additional means of risk management encouraged by the insurer is testing 100% of product. By "100%", the carrier means at least one flower from each strain being harvested from every crop. What the carrier wants to see is that all product has been found to be free of mold, mildew, pesticides and heavy metals, as certified by an independent testing laboratory.

There is more, but hopefully these examples give you an appreciation for the applicant's level of professionalism and its dedication to protecting not only its own interests, but also the safety and security of the community should it be awarded a license to operate.

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read "Doug Banfelder".

Financial
Commitments

Curaleaf has created and will fund the following programs:

Curaleaf will commit funding commitments described below as a percentage of sales, rather than based on profits, because we believe that a percentage of sales is a stronger and clearer commitment. Profit is an accounting concept, and is impacted by a number of accounting decisions, such as pace of depreciation of equipment, amortization of start up costs, etc, so there is some management discretion in determining profits. Sales, however, is an actual number, easily calculated and verifiable without discretion.

Compassionate Need Plan One percent of sales, with no cap, is budgeted to support a compassionate need program, the basic mission is to provide pharmaceutical grade medical cannabis to patients in need. Curaleaf will be refining our charitable programs on an ongoing basis in response to our experiences and evolving patient and community needs.

Substance Abuse Prevention Plan One percent of sales, up to \$100,000 annually, will be granted to groups that work to prevent substance abuse in Connecticut.

Eileen Konieczny, Chief Visionary, a medical professional herself, will assemble and chair a Community Benefits Committee that will help Curaleaf, to identify recipients and ensure the money is effectively spent on worthwhile programs.

Community Benefits Plan One percent of sales up to \$100,000 annually as described in section I of this RFA.

Research Plan Two percent of sales up to \$100,000 annually as described in section I of this RFA.

Job Creation Connecticut's regulations position Connecticut as the national leader in the production of medical cannabis. [REDACTED]

Employee Relations Curaleaf seeks to create a corporate culture that will foster a healthy and happy work environment that offers competitive salary and benefit packages. Employees will be registered with the state after a comprehensive background check.

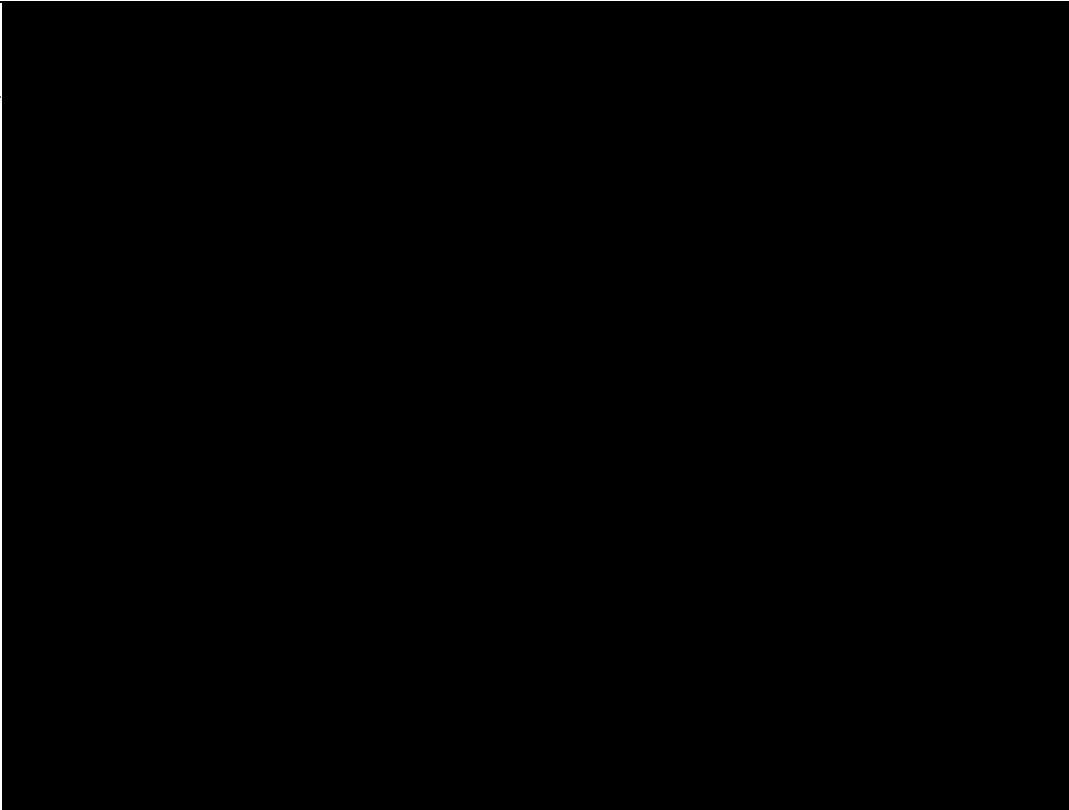
Hiring Materials Curaleaf has created the following materials to address new employee relations:

- Application
- Reference Checklist
- New hire Orientation Checklist
- Employee Handbook
- New Employee Checklist
- Employee Education
- Employee Health and Safety Plan
- Performance Review

Dispensary Relations The first goal of dispensary relations is the creation of a virtuous feedback loop. The pharmacist is the one with direct patient access. The manufacturer needs to know how well the medicines are working and what, if anything, requires modification and/or development. Working with the dispensaries to collect feedback and data will be a significant and ongoing effort. This will lead to the second goal, which is to involve pharmacists in the product development process. The third goal will be to work with dispensaries on education in their local communities, by supporting seminars and other outreach programs to physicians, patients, and the community at large. Toward this effort, Dr. Khary Bryan, PharmD, will sit on the Curaleaf Advisory Board.

Sustainability

Research Plan



Company Organization

Curaleaf is organized functionally into departments for production, control, community, business infrastructure, executive management, and our board of directors to achieve our company mission. All groups involve or are supervised by executive management.

curaleaf Organizational Plan

Board of Directors				
<i>curaleaf</i> Executive Management				
Production	Products	Controls	Community	Business Infrastructure
<i>State-of-the-art technology and professionalism</i>	<i>Pharmaceutical grade, standardized dose</i>	<i>Independent of production group, reports directly to executive management</i>	<i>Advancing the overall efficacy of medical cannabis</i>	<i>Solid, stable infrastructure for effective operations</i>
<ul style="list-style-type: none"> • Growing • Extracting • Infusion • Delivery Systems • In-house Testing • Packaging 	<ul style="list-style-type: none"> • Multiple strains • Varied delivery systems • Product Development • Research and Development 	<ul style="list-style-type: none"> • Security • Compliance • Transportation • Independent Lab Testing 	<ul style="list-style-type: none"> • Education • Marketing • Dispensary Relations • Community Relations • Substance Abuse Programs • Compassionate Need • Environmental Awareness • Energy Efficiency 	<ul style="list-style-type: none"> • Finance • Human Resources • Legal • Facilities • Administration • Information Technology
<i>Producing pharmaceutical grade, standardized dose Medical Cannabis, for use by an educated medical and patient community to improve health, well-being, and quality of life.</i>				

Executive Management	Executive management's objective is the achievement of Curaleaf's mission. Executive Management has overall responsibility for all of Curaleaf's functions and activities. Each member will focus on specific activities, and will act as a team in terms of overall responsibility and direction. Full resumes of executive management are included in section E(2) of the attached RFA.
Eileen Konieczny President and Chief Visionary	Eileen is an oncology nurse and staunch patient advocate with more than twenty years of experience. Eileen founded the patient education organization Olives' Branch and has been educating the patient and medical community about medical cannabis for years. She has extensive management, supervisory and communication skills developed through years of experience coordinating patient care in collaboration with a wide array of healthcare professionals and conducting research in support of improved practice and patient outcomes. As former executive director of the Connecticut cannabis business alliance, Eileen encouraged policies that fostered relationships with local, state and national governing bodies. Eileen has developed educational materials regarding the endocannabinoid system, medical cannabis, current research, safe &/or safer methods of administration and will communicate the contents of these materials to healthcare workers, patients, families and community members to provide a complete and accurate picture of the medical cannabis industry.
April Arrasate Chief Operating Officer	April is a Connecticut resident and a licensed attorney in the states of Connecticut and South Carolina. Prior to her legal career, April had a career in pharmaceutical research and development. She has worked in the biotech and the academia arms of this field. She is versed in the operation of small cap pharmaceutical start-ups as well as the lab safety, compliance and distribution aspects of such facilities. April is also a certified medical assistant and as such understands the medical profession and can communicate effectively with medical professionals. As an attorney, April is well equipped to handle the regulatory aspects of operating Curaleaf. She is also a skilled and effective communicator and strives for transparency and open and frequent dialogue with state and local authorities.
Robert Birnbaum CEO/CFO	A senior executive, known for creativity, effectiveness, investment knowledge, and strategic orientation, with a 30 year track-record in both retail and institutional businesses. Most recently, Robert served as Co-Founder, President, Chief Operating Officer, and Chief Compliance Officer of a hedge fund and was responsible for all aspects of the firms business, including marketing, client service, compliance, finance, operations, and technology. In prior positions, Robert has overseen over \$60 billion in assets under management, \$200 million in annual revenue, and 300 employees. Robert is not only the CEO of Curaleaf, but also an investor.
Joseph Stevens Chief Compliance Officer	Joseph Stevens, Curaleaf's Compliance Officer, is the founder of Greenleaf Compassion Center, New Jersey's first and only operational medical marijuana alternative treatment center (ATC) in the state. Joseph has an impeccable record of compliance and cooperation with state and local authorities in New Jersey. He is experienced in all processes inherent in the large scale production of medical cannabis and specifically qualified to lead up the Curaleaf compliance division.

Production Group	The production group's objective is the creation of pharmaceutical grade medical cannabis in standardized dosages in appropriate medical delivery systems. Each step of production takes advantage of current state-of-the-art technology, with the intent of incorporating future proven technology as it is developed.
Control Group	The controls group's objective is to assure the safety and security of the facility and the materials therein (including transportation to dispensaries), and to enforce compliance with all state and local regulation. Importantly, this department is independent of the other functional areas, reporting directly to executive management. This practice is consistent with best practices in other industries and companies that have developed a strong compliance and control culture.
Community Group	<p>The community group's objective is to advance the overall efficacy of medical cannabis through programs and dialogue with a wide spectrum of stakeholders. The Curaleaf management has extensive experience in providing education to the medical and patient communities, and education will be a prime focus. We will also fund research and development activities related to medical cannabis—appropriate medical uses, study of additional compounds, and delivery systems.</p> <p>We will work closely with dispensaries to gain feedback from them on patient experience. Some work will be technology based, but much will be done in person in the early stages. Moving beyond those who handle medical cannabis directly, Curaleaf will work with local law enforcement and other officials to ensure that communities are not disrupted.</p> <p>Finally, Curaleaf will be a “good citizen” with regard to the environment and energy efficiency. Our facilities plan seeks to be as “green” as possible. Curaleaf will install the most efficient equipment and lighting available today that will accomplish its tasks, and will upgrade to more energy efficient equipment as it becomes available.</p>
Business Infrastructure Group	The business infrastructure group's objective is the creation of a solid, stable platform so that the functions described above can meet their objectives effectively, and includes finance, human resources, legal, administration, facilities, and information technology. These functions will be supported by outstanding outside professionals (law firm, accounting firm, technology suppliers.) Curaleaf is represented by Robinson & Cole, LLP (Hartford); our accounting and tax firm is Totilo & Co LLC (Stamford). Curaleaf Executive Management has extensive experience in running small and large business organizations.
Board of Directors	Board of directors' objective is to assure the appropriateness of Curaleaf's mission, strategy, executive leadership and major resource commitments, and to seek an adequate financial return so that Curaleaf can thrive as a viable business fulfilling the role envisioned by the State of Connecticut. Responsibilities include executive staffing and compensation, overall budget approval, and general corporate governance. Board members include executive management and financial backers. Several of our financial backers have extensive experience in venture capital and private equity, and have served on boards of start-ups. Their experience in “nurturing” startups has been of great value to Curaleaf.

Board of Advisors	Curaleaf has assembled and Advisory Board consisting of medical and pharmaceutical professionals to aid Curaleaf in the production of pure, pharmaceutical grade medical cannabis that caters to the needs of qualifying patients. Letters confirming seats on advisory board are attached hereto.
Robert Stark, MD	Dr. Robert Stark practices internal medicine and cardiology in Greenwich, Connecticut. A graduate of Harvard Medical School, Dr. Stark has done advanced training in cardiology and cholesterol metabolism at the National Institutes of Health (N.I.H.). He is Medical Director of the Cardiovascular Prevention Program at Greenwich Hospital/Yale New Haven Health, and teaches on the clinical faculty of the New York Medical College. Dr. Stark has a special interest in the physician-patient relationship and its potential therapeutic value. He's also focused on the impact of diet, lifestyle, relationships and mindset and their role in overall well-being.
Pericles Calias, PhD	<p>Dr. Calias is a PhD in organic chemistry and a pharmaceutical development expert with over fifteen years of experience building and leading diverse teams of drug and device development professionals. He has a demonstrated ability to successfully analyze organizational strengths, identify growth opportunities, and develop innovative approaches to advance discovery programs from concept to commercialization.</p> <p>Dr. Calias will advise the organization on the general execution of research and development. Specifically, he will utilize his extensive experience in developing drug delivery systems to implement sound scientific practices in the advancement of cannabis science</p>
Marylynne Mathre, RN, MSN, ACRN	<p>Mary Lynn (ML) Mathre, RN, MSN, CARN is the President and Co-founder of Patients Out of Time, a national non-profit organization dedicated to educating health care professionals and the public about the therapeutic use of cannabis. She is editor of Cannabis in Medical Practice: A Legal, Historical Pharmacological Overview of the Therapeutic Use of Cannabis (1997) and co-editor of Women and Cannabis: Medicine, Science and Sociology (2002).</p> <p>Currently she is an independent addictions consultant. Ms. Mathre's focus on medicinal cannabis began in 1985 with the completion of her graduate thesis on Disclosure of Marijuana Use to Health Care Professionals. Since then she has authored cannabis resolutions for several organizations including the Virginia Nurses Association, the National Nurses Society on Addictions (now the International Nurses Society on Addictions), and the American Public Health Association; written numerous articles and chapters on medicinal cannabis; and served as an expert witness. Ms. Mathre is a founding member and President of the newly created American Cannabis Nurses Association.</p>
Khary Bryan, PharmD	Dr. Bryan is a Doctor of Pharmacy and holds a pharmacy license from the Connecticut Commission of Pharmacy. He has been a staff Pharmacist at CVS since 2001. Dr. Bryan is also a member of the International Cannabinoid Research Society, the Canadian Consortium for the Investigation of Cannabinoids and the Society of Cannabis Clinicians.

Board of Advisors
(continued)

Dr. Sunil Kumar Aggarwal

Dr. Sunil Kumar Aggarwal (M.D., 2010, Ph.D., Medical Geography, 2008, University of Washington, NIH-supported Medical Scientist Training Program) is an Associate Member of the New York Academy of Medicine and a Resident in Physical Medicine and Rehabilitation at NYU's Rusk Institute of Rehabilitation Medicine. As a NSF Graduate Research Fellow, he conducted human studies of medical cannabis use under the first-ever granted federal Certificates of Confidentiality which protected 176 enrolled study subjects recruited both from sites of both cannabis delivery and medical consultation. He has published in journals of Pain medicine, Hospice and Palliative Medicine, General Medicine, and Law, in addition to a book chapter for the general public and chapters in supportive oncology and palliative care textbooks.

He has presented at the National Association of Boards of Pharmacy, the American Psychiatric Association, and the American Academies of Neuromuscular and Electrodiagnostic Medicine, Hospice and Palliative Medicine, and Physical Medicine and Rehabilitation, as well as the University of Denver School of Law, and provided testimony to multiple state Boards of Pharmacy. He served an expert reviewer for the AMA Council on Science and Public Health's report on medical cannabis science and led the effort to change the organization's policy such that they now urge the government to reconsider the schedule I status of cannabis. He plans to complete a 2014-2015 Clinical Fellowship in Hospice and Palliative Medicine at the NIH Clinical Center.

Curaleaf is financially strong.

- \$6 million committed capital.
- \$2 million in cash held ready [REDACTED] to satisfy the state’s escrow requirement.
- [REDACTED]
- [REDACTED]
- Additional resources can be provided if necessary

Funding is provided by seven individuals—six long time Connecticut residents, one from Westchester County—using their own resources. (As described elsewhere, documentation provided verifies the ability to meet all capital commitments.) These individuals have broad business experience, include managing large and small organizations, manufacturing, entrepreneurship, venture capital, real estate and private equity. Several have served on Boards of successful startups. One of this group will take an active day-to-day role in management as CEO, others will serve on Curaleaf’s Board. They provide the business experience and financial strength to enable Curaleaf to fulfill its mission successfully.

Productive Capacity

Phase 1 of Curaleaf’s plan results in a productive capacity [REDACTED]
[REDACTED]
Phase 2 increases capacity [REDACTED]
[REDACTED]

November 10, 2013

Commissioner Rubenstein

Department of Consumer Protection

165 Capitol Avenue

Harford, CT 06106

Dear Commissioner Rubenstein,


I am writing to confirm my commitment to be a member of the curaleaf advisory board upon their securing a Connecticut license for the production of medical cannabis.

curaleaf has asked me to advise them as a medical geographer, physician-scientist, and expert on cannabis and cannabinoid medicine with over ten years of experience in this field.

Research is an essential component of the curaleaf mission. I will therefore also be advising on research and development.

If the department has any particular questions regarding my position as an advisory board member or the community acceptance of the curaleaf organization, please feel free to contact me directly.

Sincerely yours,

A handwritten signature in black ink that reads "Sunil K. Aggarwal". The signature is written in a cursive, slightly slanted style.

Sunil Aggarwal, MD, PhD

New York Medical License # 261685

Invited External Reviewer, American Medical Association Council on Science and Public Health Report, "Use of Cannabis for Medicinal Purposes"

Mary Lynn Mathre RN, MSN, CARN
1472 Fish Pond Road
Howardsville, VA 24562
434-263-4484

November 3, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Harford, CT 06106

Dear Commissioner Rubenstein,

I am writing to confirm my commitment to be a member of the **curaleaf** advisory board upon their securing a Connecticut license for the cultivation of medical cannabis.

I was approached to hold a board seat by **curaleaf** CEO Eileen Konieczny, whom I have worked with professionally as Board Members of the American Cannabis Nurses Association. **Curaleaf** has asked me to advise them in developing multiple educational programs designed for various audiences: physicians, nurses, other allied health care personnel, patients, general public, law enforcement, legislators and parents groups. It is our unique understanding of healthcare that has brought Eileen and me together, and I feel this relationship will be one that benefits the state of Connecticut greatly.

Education is an essential component of the **curaleaf** mission. I will advise and assist the organization in their execution of specific areas of concentration as well as overall content creation. I will be able to involve not only the American Cannabis Nurses Association but also Patients Out of Time, which is a patient advocacy organization dedicated to educating health care professionals and the public about medical cannabis. Patients Out of Time has been incorporated since 1995 and is led by medical and nursing professional and the remaining participants in the federal government's Investigation New Drug program for cannabis.

As an independent addictions consultant, I will also work with **curaleaf** in creating an educational and advertising program with the purpose of deterring the recreational use of illicit drugs and pharmaceuticals among minors by (1) explaining the damaging effects of illicit drugs and pharmaceuticals on the developing brain, (2) reiterating that the legalization of marijuana as a pharmaceutical does not indicate that it is a safe recreational drug for minors.

If the department has any particular questions regarding my position as an advisory board member or the community acceptance of the **curaleaf** organization, please feel free to have them contact me directly.

Sincerely yours,



Mary Lynn Mathre RN, MSN, CARN
1472 Fish Pond Road

Dr. Khary Bryan, PharmD
34A Congress St
Hartford, CT 06114

November 8, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Hartford, CT 06106

Dear Commissioner Rubenstein,

I am writing to confirm my commitment to be a member of the curaleaf advisory board upon their securing a Connecticut license for the cultivation of medical cannabis

As a Doctor of Pharmacy and a disease prevention consultant with a deep understanding of cannabis therapeutics, I will advise the board generally to help them achieve their mission. I have also committed to specifically guide curaleaf in the areas of research and product development. I am particularly interested in these aspects of their operation because I am the pharmacist applying for a Dispensary license in Connecticut as Apothecary 241.

Curaleaf and Apothecary 241 share commitments to providing qualifying patients with refined cannabinoid based products of varying potency. We also both aim to educate the cannabis naïve patient who is in need of symptomatic relief with minimal euphoria. Curaleaf intends to develop products that will accomplish this objective. I will apply my clinical experience and cannabis knowledge to help guide the development of their product line.

Curaleaf consists of legal and medical professionals who are patient advocates and who intend to provide standardized doses of legally compliant forms of medicine for qualifying patients. I have seen their business plan presentation and I believe they have pulled together a team of agricultural, production and science experts to accomplish this task. It is difficult for me to contain my excitement about the state of the art production facility and team. They have truly embraced the medical vision of the Connecticut Medical Marijuana Program.

If the department has any particular questions regarding my position as an advisory board member or the community acceptance of the curaleaf organization, please feel free to have them contact me directly.

Sincerely yours,

Dr. Khary Bryan, PharmD
34A Congress St
Hartford, CT 06114



Pericles Calias, Ph.D.
39 Swains Pond Avenue
Melrose, MA 02176
Email: pcalias@comcast.net
Phone: 339-927-0711

November 4, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Harford, CT 06106

Dear Commissioner Rubenstein,

I am writing to confirm my commitment to be a member of the *curaleaf* advisory board upon their securing a Connecticut license for the cultivation of medical cannabis.

I was approached to hold a board seat by *curaleaf* COO April Arrasate, whom I have worked with professionally in the pharmaceutical research and development industry. *Curaleaf* has asked me to advise them as a PhD in organic chemistry and as a pharmaceutical development expert with over fifteen years of experience building and leading diverse teams of drug and device development professionals.

Research is an essential component of the *curaleaf* mission. As such, I will advise the organization in the general execution of research and development. Specifically, I will utilize my extensive experience in developing drug delivery systems as they implement sound scientific practices in the advancement of cannabis science.

If the department has any particular questions regarding my position as an advisory board member or the community acceptance of the *curaleaf* organization, please feel free to have them contact me directly.

Sincerely yours,



Pericles Calias, Ph.D.
39 Swains Pond Avenue
Melrose, MA 02176
Email: pcalias@comcast.net
Phone: 339-927-0711

ROBERT M. STARK, M.D., P.C.
FELLOW, AMERICAN COLLEGE OF PHYSICIANS
FELLOW, AMERICAN COLLEGE OF CARDIOLOGY
40 WEST ELM STREET
GREENWICH, CONNECTICUT 06830

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November 4, 2013

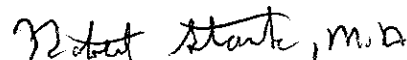
Commissioner Rubenstein
Department of Consumer Protection
165 Capital Avenue
Hartford, CT 06106

Dear Commissioner Rubenstein,

I am writing to confirm my commitment to be a member of the *curaleaf* Advisory Board upon their securing a Connecticut license for the cultivation of medical cannabis. I am personally familiar with the individuals who comprise the *curaleaf* group. As a practicing physician in Connecticut, I believe that cannabis has an important role to play in the effective treatment of patients, and I am confident that *curaleaf* will accomplish Connecticut's goals for the program.

I intend to provide, as an Advisory Board member, a physician's perspective and to help *curaleaf* meet the highest standards of medical science.

Sincerely,



Robert M. Stark, M.D.



Volume II
Section C

C

- Best Practices and Procedures
- Operational Inspection Requirements
- Recall Manual
- MJ Freeway Compliance Mechanism
- Security Plan
- Risk Assessment

OPERATIONAL INSPECTON REQUIREMENTS

The logo for Curaleaf, featuring the word "curaleaf" in a lowercase, rounded, green sans-serif font.

*This manual was created to house the curaleaf compliance procedures upon licensing. The contents of the manuals presented in this RFA, and those manuals, protocols and procedures created thereafter will be organized according to the regulations for ease of operation and inspection.

OPERATIONAL INSPECTON REQUIREMENTS

Section: General Statement

Subject: Palliative Use of Marijuana

Sec 21a-408

Policy: Curaleaf will abide and comply with all rules and regulations set forth by the state of Connecticut Department of Consumer Protection as defined in Sec. 21a-408.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Indoor Cultivation Site Sec 21a-408

Curaleaf Will:

1. Produce marijuana only at our Simsbury, CT site.
2. Sell marijuana with a consistent unit price and label.
3. Limit our inventory of usable marijuana and seeds to reflect current patient needs as identified by the number of patients within the Department's program.
4. Comply with all applicable laws and rules of the Department of Consumer Protection and comply with all inspection and enforcement activities.
5. Comply with Sec 21a-408-1 to 21a-408-70.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Accessibility of Marijuana Storage Areas

Sec. 21a-408-53

Curaleaf will limit access to medicinal marijuana storage areas to the absolute minimum number of specifically authorized employees as outlined in our security procedures and in accordance with 21a-408-53.

1. When it is necessary for employee or non employee maintenance personnel, business guests or visitors to be present in or pass through medical marijuana storage areas, we shall provide for adequate observation of the area by an employee whom has authorization by either policy or job description to supervise the activity.

Curaleaf will ensure that storage of usable marijuana prepared for distribution to dispensaries is in a locked area with adequate security as outlined in our security procedures.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Alcohol, Drug and Smoke Free Workplace Policy

Curaleaf employs a “zero tolerance policy” with regard to alcohol, smoking and drug use in the workplace. Any employee found to have violated this policy shall be immediately terminated. The causes for termination shall include but not be limited to the following activities:

1. The use, possession, solicitation or sale of narcotics, other illegal drugs or prescription medication without an authorized prescription or while performing job duties.
2. Conviction of a crime directly related to the possession, sale or distribution of narcotics, other illegal drugs or unauthorized prescription drugs.
3. The presence of any detectable amount of prohibited substances in employee’s system while at work, while on the premises of Curaleaf, or representing Curaleaf in any business related capacity. “Prohibited substances” include illegal drugs, alcohol, or prescription drugs not taken in accordance with an authorized medical prescription given to the employee.

Curaleaf will conduct drug and/or alcohol tests in accordance with any or all of the following procedures:

1. Random testing: Employees may be selected for drug and/or alcohol testing at any time during their employment with Curaleaf.
2. For-Cause Testing: Curaleaf may ask an

employee to submit to a drug and /or alcohol test at any time it feels that the employee may be under the influence of drugs or alcohol, including, but not limited to the following circumstances: evidence of drugs of alcohol on or about the employee’s person or in the employee’s vicinity, unusual conduct on the employee’s part that suggests impairment or influence of drugs or alcohol, negative performance patterns, or excessive and unexplained absenteeism or tardiness.

3. Post-Accident Testing: Any employee involved in an on-the-job accident or injury event may be asked to submit to a drug and or alcohol test. “Involved in an on-the-job accident or injury” means not only the one who was or could have been injured, but also any employee who potentially contributed to the accident or injury event in any way.
4. If an employee is tested for drugs or alcohol outside of the employment context and the results indicate a violation of this policy, or if an employee refuses a request to submit to testing under this policy, the employee may be subjected to appropriate disciplinary action, up to and including discharge from employment. In such a case, the employee will be given an opportunity to explain the circumstances prior to any final employment action becoming effective.
5. A negative dilute (urine specimen with a creatinine level of less than 20 g/dl and a specific gravity of 1.003 or less) test result will be accepted for compliance with this policy

This policy does not apply if an employee, who is also a qualifying patient, fails a drug test solely because of the presence of marijuana in a confirmed positive test result.

Curaleaf offers employees access to an employee assistance program through [REDACTED]
[REDACTED]
[REDACTED]

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Brand Name

Sec. 21a-408-59

Curaleaf shall assign a brand name to each marijuana product. Each brand name shall be registered with the department prior to any sale to a dispensary facility and shall associate each brand name with a specific laboratory test the includes a terpenes profile and a list of active ingredients including:

1. THC
2. THCA
3. CBD
4. CBDA
5. Any other active ingredient that constitutes at least 1% od the marijuana batch used in the product

Curaleaf will not label two marijuana products with the same brand name unless the laboratory test results for each product indicate that they contain the same level of each active ingredient listed above, +/- 3%

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Conducting Inventory

Sec. 21a-408-65

Curaleaf will conduct an initial comprehensive inventory of all medicinal marijuana, including marijuana available for cultivation and usable marijuana available for dispensing, seedling to mature marijuana plants and usable marijuana from the first day of production. This will be accomplished by using the MJ Freeway software package.

- 1.If for any reason we commence business without any medicinal marijuana on hand we will record this fact as the initial inventory.
2. Marijuana is deemed to be “on hand” if it is in the possion or control of Curaleaf.
3. Our inventory will include damaged, defective, expired or adulterated marijuana awaiting disposal. This will include the quantity and the reasons for maintaining the marijuana.

Inventory controls and procedures are in place for conducting inventory of all cultivated, stored, usable, and unusable marijuana.

We will conduct a weekly inventory of all cultivated, stored, usable, and unusable marijuana. Which will include the date of inventory, summary of inventory findings, the name, signature and title of the individual who conducted the inventory, the date of receipt, the kind and quantity of marijuana.

We will conduct a comprehensive and accurate annual inventory once a year.

All inventories will be [REDACTED]

When disposing of marijuana we will maintain a written record of the date, the quantity, the manner of disposal and the persons present during the disposal. Their signatures are required as part of this procedure. All disposed marijuana will be done in pursuant to 21a-408-64.

Curaleaf will keep disposal records for at least three years in accordance with 21a-408-70.

Whenever any sample or record is removed by a person authorized to enforce the provisions of sections 21a-408-1 to 21a-408-70, inclusive, of the regulations of Connecticut State Agencies or the provisions of the State of Connecticut food, drug and cosmetic statutes and regulations for the purpose of investigation or as evidence, such a person shall tender a receipt in lieu thereof and the receipt shall be kept for three years.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Handling of Marijuana

Sec. 21a-408-53

Medical marijuana that is prepared for distribution shall be securely stored Simsbury, CT facilities and handled as out lined in our security procedures and in compliance with 21a-408-62.

The handling of marijuana shall:

1. Restrict movement between production compartments
2. Each employee shall have a color coded identification badge based on the compartment in which they are assigned.
3. All clothing shall be pocketless for all employees
4. Chain of custody shall be documented and maintained consistent with Sec 21a-408-53 4(d).
5. Access to marijuana shall be limited to essential employees and shall be immediately returned to storage after the completion of any process or at the end of their scheduled day.

All areas where the handling of marijuana occurs shall be compartmentalized and restricted to employees based duties assigned to them.

Curaleaf will maintain updated Policies and procedures for:

1. Mandatory/voluntary recall
2. Handling any crisis that affects the security or operation of the facility in the event of a strike, fire, flood, or other natural disaster or emergency
3. The destruction of marijuana or related products
4. Ensuring older stock will be used first

Laboratory Staff:

1. May enter cultivation facility for the sole purpose of identifying and collecting samples

No persons, except cultivation facility employees, local law enforcement, the commissioner or commissioner's authorized representative or other federal, state, or local government official, shall be allowed on the premises except that:

1. Any persons who are no employees but who are permitted on the premises pursuant to 21a-408-62 (f)(1)(2) shall have a visitors identification badge clearly visible and be escorted and monitored by an employee at all times
2. Visitor badge must be returned to facilities employee upon exiting the facility
3. A visitor's log shall be maintained in accordance with 21a-408-70

In the event of an emergency the, written notice will provided to the commissioner which shall include:

1. Name of individual
2. Company name of individual
3. Purpose of visit
4. Date of visit
5. Time of visit

All emergency visitors shall be escorted, monitored and a written log of the visit shall be kept in accordance with 21a-408-70.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Storage of Marijuana

Sec. 21a-408-53

Medical marijuana that is prepared for distribution shall be securely stored Simsbury, CT facilities as outlined in our security procedures and in compliance with 21a-408-62.

The storage area shall:

6. Have adequate lighting, ventilation, temperature, sanitation, humidity , space, and security conditions.
7. Be maintained in a clean and orderly condition
8. Be free from infestation by insects, rodents, birds, or vermin of any kind

A separate secure storage area, in a quarantined area, will be maintained for any product that is outdated, damaged, deteriorated, misbranded, or adulterated, or whose container or packaging have been opened or breached, until such products can be destroyed in accordance with 21a-408-64.

All areas where edible forms of marijuana will be sure and comply with Connecticut Food, Drug and Cosmetic Act Connecticut General Statues 21a-91 to 21a-120, and sections 21a-151 to 21a-159 regarding bakeries and food manufacturing establishments.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Employee Training

Curaleaf will contract with the following company to provide training for all employees, agent and volunteers:



Members of the Curaleaf manangement team will conduct additional training that is specific to our facilities.

Each employee, agent or volunteer at the time of his or her initial appointment shall receive the following training:

1. Professional conduct, ethics and HIPPA training.
2. Information on recent developments in the use of medical marijuana.
3. The proper use of security measures and controls that have been adopted.
4. Specific procedural instructions for responding to an emergency. Including robbery, fire or workplace violence.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Informational Policies; labeling

Sec. 21a-408-56

Curaleaf will maintain information about the different potencies, effects and forms for each usable marijuana package that we dispense to registered qualifying patient and their caregivers.

Curaleaf will place a firmly affixed label on each package of medicinal marijuana it prepares to dispense that contains the following:

1. Our Name and address
2. The quantity of the medicinal marijuana contained in the package.
3. The date medicinal marijuana was packaged.
4. A sequential serial number, lot number and bar code to identify the lot associated with manufacturing and processing.
5. The cannabinoid profile including the THC,THCA,CBD,CBDA level.
6. An expiration date.
7. A statement that the product is for medical use by a qualifying patient and is not for resale.
8. A list of any other ingredients beside medical marijuana contained.
9. The date of final testing and packaging.
10. Brand name of product in pursuant to 21a-408-59.
11. Any active ingredient that constitutes at least 1% of the batch
12. A pass/fail rating based on the laboratory analysis.

Curaleaf will not distribute medicinal marijuana if the package it is contained in does not have a label with all of the above information on it.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: General Statement

Subject: Laboratory

Sec. 21a-408-57 to 58

Curaleaf will contract with an independent state laboratory to test and analyze all pharmaceutical grade marijuana and marijuana related products.

Curaleaf shall provide a random samples of all marijuana in a homogenized batch to the laboratory before the manufacturing of products or distribution to any dispensary facility for quality control analysis.

Curaleaf will contract with the laboratory for the testing requirements as outlined in 21a-408-58

Curaleaf will not distribute marijuana or marijuana related product until a full analysis report is provided in writing from the laboratory.

If a product does not pass the microbiological, mycotoxin, heavy metal, or pesticide chemical residue test, based on the standards outline in 21a-408-57(2), Curaleaf will dispose of the entire batch from which the sample was taken in accordance with 21a-408-64.

Curaleaf shall provide laboratory results to dispensary facilities for each batch of marijuana used in a product purchased by the dispensary facility.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Manufacturing of Marijuana Products

Sec. 21a-408-55

Curaleaf will process pharmaceutical marijuana in a safe and sanitary manner to protect registered qualifying patients from adulterated marijuana and will process the dried leaves and flowers of the female plant only and will be:

1. Well cured and free of seeds and stems.
2. Free of dirt, sand, debris or other foreign matter.
3. Free of mold, rot or other fungus or bacterial diseases, pesticides or any other contaminants.

Curaleaf will package and dispense medicinal marijuana in the following forms:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]

All products shall be composed of pharmaceutical grade marijuana and will not include any alcohol, dietary substance or any other drug. Curaleaf shall not manufacture any product that is not in compliance with 21a-408-55.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Records

Subject: Marijuana related records

Sec. 21a-408-54

Curaleaf shall keep records of all marijuana produced or manufactures and of all materials disposed of. These records shall be maintained in accordance with section 21a-408-70.

Records shall contain:

1. The brand name and kind and quality of marijuana
2. The date of production or removal from production
3. A record of all marijuana sold, transported or otherwise disposed of
4. The date and time of selling, transporting or disposing of the marijuana
5. The name and address of the dispensary facility to witch is was sold
6. The name of the dispensary who took custody of the marijuana
7. The name of the production facility employee responsible for transporting the marijuana

Operational Inspection Requirements Report records shall be retained by Curaleaf for a minimum of three years.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Marketing

Sec. 21a-408-66

Curaleaf will not market or advertise in a way to effect, steer or influence a qualifying patient or caregiver with regard to the selection of a physician, dispensary or medical marijuana product. All Marketing or advertising material shall be produced in pursuant with Sec. 21a-408-66 to 67.

Curaleaf's advertisement for marijuana or any marijuana product shall not contain:

- (1) Any statement that is false or misleading in any material particular or is otherwise in violation of the Connecticut Unfair Trade Practices Act, section 42-110b et seq.
- (2) any statement that falsely disparages a competitor's products;
- (3) any statement, design, or representation, picture or illustration that is obscene or indecent.
- (4) any statement, design, representation, picture or illustration that encourages or represents the use of marijuana for a condition other than a debilitating medical condition.
- (5) any statement, design, representation, picture or illustration that encourages or represents the recreational use of marijuana.
- (6) any statement, design, representation, picture or illustration related to the safety or efficacy of marijuana unless supported by substantial evidence or substantial clinical data.
- (7) any statement, design, representation, picture or illustration portraying anyone under the age of 18, objects suggestive of the presence of anyone under the age of 18, or contains the use of a figure, symbol or language that is customarily associated with anyone under the age of 18.
- (8) any offer of a prize or award to a qualifying patient, primary caregiver or physician related to the purchase of marijuana or a certification for the use of marijuana.
- (9) any statement that indicates or implies that the product or entity in the advertisement has been approved or endorsed by the commissioner, department, the State of Connecticut or any person or entity associated with the State of Connecticut.

Any advertisement that Curaleaf intends publish for marijuana or a marijuana product shall be submitted to the commissioner at the same time as, or prior to, the dissemination of the advertisement.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Operation

Sec. 21a-408-52

Curaleaf shall not:

1. Own or operate more than one production facility.
2. Sell, deliver, transport, or distribute in any place except its approved production facility.
3. Produce or manufacture marijuana for use outside the State of Connecticut.
4. Sell, deliver, transport, of distribute marijuana to any place except a dispensary facility within Connecticut.
5. Enter into an exclusive agreement with any dispensary facility
6. Refuse to deal with any dispensary facility that is willing to deal with the Curaleaf on the same terms and conditions as other dispensary facilities with whom the Curaleaf is dealing.
7. Either directly or indirectly discriminate in price between different dispensaries that are purchasing like, grade, strain, brand, and quality of marijuana or marijuana product.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Records

Subject: Operational Inspection Records

Sec 21a-408-69

Operational Inspection Requirements Report records shall be retained by Curaleaf for a minimum of three years.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Organic Certification

Sec 21a-408-56

Pharmaceutical Grade marijuana or marijuana related products marijuana can only be labeled “organic” if the producer of marijuana plants have been organically grown as defined in section 21a-92 of the Connecticut General Statutes and have been produced, processed, manufactured and certified to be consistent with organic standards in compliance with section 21a-92a of the Connecticut General Statutes.



CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Packaging and labeling

Sec. 21a-408-56

Curaleaf will package and label pharmaceutical marijuana in a safe and sanitary manner to protect registered qualifying patients from adulterated marijuana. and will process the dried leaves and flowers of the female plant only and will be:

Medicinal marijuana will be packaged in a secure area connected to the production area.

Each package of usable marijuana, at a minimum, will:

1. Contain no more than a one month supply marijuana or equivalent dose depending on form.
2. Bear a label that complies with 21a-408-56
3. Be in a closed child-resistant and light-resistant container as set forth in 16 CFR 1700.1(b)(4) that holds no more than a one month supply and sealed, so that the package cannot be opened or consumed without the seal being broken.

Once the package is sealed, it will not be opened except for quality control. Once opened for this purpose the medicinal marijuana will be deemed unusable.

Prior to the sale of any marijuana or related products a label shall be securely ffix to the package that contains:

1. The name and address of producer.
2. The brand name of product pursuant to 21a-408-59.
3. A unique serial number to facilitate any warnings or recalls.
4. The date of testing and packaging.
5. The expiration date.
6. The quantity of marijuana contained therein.
7. A terpene profile and active ingredients in pursuant to 21a-408-56 (a)(b)(c)(d)(e).
8. A pass/fail rating based on the laboratories analysis
9. Information to comply with the state of Connecticut's labeling requirements as defines in 21a-91 to 21a-120 and 21a-151 to 21a-159

Cura leaf will label a product "Organic" only if it meets the definition as defined in 21a-92 and is certified to be consistent with organic standards pursuant to 21a-92a.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Personnel Records

CuraLeaf shall maintain a personnel record for each employee, principal officer, director, board member, and agent or volunteer that includes the following:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]

[REDACTED]

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Pesticide Use

Sec. 21a-408-54

Curaleaf will not employ the use of any pesticides in the cultivation of medicinal marijuana.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Prohibitions

Curaleaf will not furnish usable marijuana to a registered dispensary if there is reasonable suspicion that the organization is in violation of the Regulations or other substances or is unlawfully redistributing usable marijuana to parties other than qualified patients.

Curaleaf will not manufacture or distribute any product that:

1. Includes liquor, dietary suppliments or any drug except for pharmaceutical grade marijuana.
2. Be manufactured or sold as a beverage or confectionary
3. Is obscene or indecent
4. May encourage recreational use
5. May encourage use for a condidtion other than a debilitating condition
6. Is customarily associated with persons under the age of eighteen
7. Have had pesticide chemicals or organic solvents used during the production or manufacturing process.

Curaleaf will only dispense medical marijuana and related products to licensed state dispensaries in a form approved by the commissioner and in accordance with 21a-408-55:

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Reportable Events

Sec 21a-408-63

Curaleaf will immediately report any loss, inventory discrepancies, diversion or theft, unauthorized destruction, unauthorized alteration of records related to marijuana or qualifying patients, dispensary or producer, whether or not the medical marijuana, funds or other lost or stolen property is subsequently recovered and/or the responsible parties are identified and action taken against them.

Local law enforcement will be called immediately at the following numbers:

Cultivation facility: Simsbury Department: (860) 658-3100

Drug Control Division of the department: (860) 713-6065

Curaleaf will notify the Drug Control Division within 24 hours by telephone at **(860) 713-6065** and follow up with written notification within 10 business days for any of the following events:

1. An alarm activation or other event that requires response by public safety personnel.
2. A breach of security.
3. Failure of the security alarm system due to loss of electrical support or mechanical malfunction that is expected to last longer than eight hours.
4. Documentation of any corrective measures taken, if necessary.

Curaleaf will maintain a Reportable Events Log Book in accordance with 21a-408-70 for documenting any reportable occurrence. This documentation will be kept for at least three years from the date of any such occurrence. CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Restricted Movement

21a-408-53

All cultivation of marijuana will take place in our Simsbury, CT location that is a non-descript and secure facility.

Access to our cultivation facility is limited to cardholders that are one of the following:

1. Principal officers
2. Directors
3. Board Members
4. Employees of Curaleaf that have authorization and duties that require their presence at the site or compartments
5. Laboratory Staff for purposes of identifying and collecting marijuana samples

All areas where the handling of marijuana occurs shall be compartmentalized and restricted to employees based duties assigned to them. Each employee shall have a color coded identification badge based on the compartment in which they are assigned.

No persons, expect cultivation facility employees, local law enforcement, the commissioner or commissioner's authorized representative or other federal, state, or local goverment official, shall be allowed on the premises expect that:

4. Any persons who are no employees but who are permitted on the premises pursuant to 21a-408-62 (f)(1)(2) shall have a visitors identification badge clearly visible and be escorted and monitored by an employee at all times
5. Visitor badge must be returned to facilities employee upon exiting the facility
6. A visitor's log shall be maintained in accordance with 21a-408-70

In the event of an emergency, written notice will provided to the commissioner which shall include:

6. Name of individual
7. Company name of individual
8. Purpose of visit
9. Date of visit
10. Time of visit

All emergency visitors shall be escorted, monitored and a written log of the visit shall be kept in accordance with 21a-408-70.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Secure Transport

Sec. 21a-408-60

Curaleaf will cultivate medicinal marijuana at our Simsbury, CT facility and transport only usable marijuana to the licensed dispensaries in the State of Connecticut. As outlined in our delivery plan.

At least two registered Curaleaf employees will be used as the delivery team.

1. At least one team member shall remain with the vehicle containing Medicinal marijuana at all times.
2. Each team member will carry a cell phone when transporting Medicinal marijuana.
3. Each team member will possess their Curaleaf department issued identification card at all times and is able to produce it to Department staff or law enforcement officials upon demand.

[REDACTED]

[REDACTED]

Curaleaf will complete the transport of medicinal marijuana in a timely and efficient manner. The transport vehicle will proceed from the cultivation facility to the dispensary without intervening stops or delays and routes and times shall be randomized.

Curaleaf will maintain a shipping manifest. The shipping manifest shall be complete and securely transmitted to the dispensary that will receive the products and to the Department within twenty-four hours prior to transport. All shipping manifest shall be kept in accordance with Sec. 21a-408-70. Each shipping manifest shall record:

1. The date and time that the transport began and ended.
2. The names of the delivery team members.
3. The weight of the medicinal marijuana transported
4. The lot number of the medicinal marijuana, the name of the product,
5. The signatures of the employees comprising the delivery team.
6. Beginning and ending vehicle odometer reading.
7. Time, date and signature or receiving agent.

Curaleaf will report any vehicle accidents, diversions, losses, or other reportable events that occur during transport of medicinal marijuana to the permitting authority in accordance with Sec. 21a-408-63.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Security Alarm System

Sec. 21a-408-62

Curaleaf will have an adequate security system for our cultivation facility to prevent and detect diversion, thief, or loss and will be monitored by:

- ADD COMPANY

As outline in our security protocol Curaleaf shall have:

1. A perimeter alarm.
2. Motion detectors.
3. Video cameras in all areas that may contain marijuana and at all points of entry and exit, which shall be appropriate for the normal lighting conditions of the area under surveillance. The cameras shall be directed at all approved safes, approved vaults, dispensing areas, marijuana sales areas and any other area where marijuana is being produced, harvested, manufactured, stored or handled. At entry and exit points, the cameras shall be angled so as to allow for the capture of clear and certain identification of any person entering or exiting the facility.
4. Twenty-four (24) hour recordings from all video cameras, which shall be available for immediate viewing by the commissioner or the commissioner's authorized representative upon request and shall be retained for at least thirty (30) days.
5. Duress alarm
6. Panic alarm
7. Holdup alarm
8. Automatic Voice Dialer

9. A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system.
10. The ability to immediately produce a clear color still photo that is a minimum of 9600 dpi from any camera image (live or recorded).
11. A date and time stamp embedded on all recordings.
12. The ability to remain operational during a power outage.
13. A backup security system with a secondary monitoring firm.
14. Shall remain locked at all times

Curaleaf's security system equipment and recording will be maintained in a secure location so as to prevent theft, loss, destruction or alterations.

Security surveillance area access shall be limited to:

1. Persons that are essential to surveillance operation.
2. Law enforcement agencies.
3. Security system service personnel.
4. The commissioner or the commissioner's authorized representative
5. Others when approved by the commissioner.

Curaleaf shall keep a log of authorized employees and service personnel that have access to the surveillance room that will be available to the commissioner or the commissioner's authorized representative upon request. If on-site, surveillance rooms shall remain locked and shall not be used for any other function.

Curaleaf will maintain the outside perimeter of the cultivation facility and keep the premises well-lighted.

Curaleaf shall keep all security equipment shall be in good-working order and test the security system once per month as per manufacturers guidelines.

CURALEAF

OPERATIONAL INSPECTON REQUIREMENTS

Section: Operational Inspection Requirements

Subject: Security Protocol

Sec. 21a-408-61

Curaleaf will follow all security protocol as outlines in Curaleafs security protocols.

Curaleaf shall:

1. Not produce, manufacture or maintain marijuana in excess of the quantity required for normal, efficient operation.
2. Store all marijuana products in an approved safe or approved vault and in such a manner as to prevent diversion, theft or loss.
3. Maintain all marijuana that is not part of a finished product in a secure area or location within the cultivation facility accessible only to specifically authorized personnel, which shall include only the minimum number of employees essential for efficient operation.
4. Keep all approved safes, approved vaults, or any other approved equipment or areas used for the production, cultivation, harvesting, processing, manufacturing or storage of marijuana, securely locked or protected from entry, except for the actual time required to remove or replace marijuana.
5. Keep all locks and security equipment in good working order.
6. Not allow keys to be left in the locks and not store or place keys in a location accessible to persons other than specifically authorized personnel.
7. Not allow other security measures, such as combination numbers, passwords or electronic or biometric security systems, to be accessible to persons other than specifically authorized personnel.
8. Keep the production facility securely locked and protected from entry at all times.

Curaleaf will not allow access to any person within the cultivation facility except:

1. Laboratory employees and production facility personnel whose responsibilities necessitate access to the area of the production facility containing marijuana and then for only as long as necessary to perform their job duties as described in Sec. 21a-408-53.

Curaleaf shall have signs posted at all entry ways of any area of the cultivation site containing marijuana, including a room with an approved safe or approved vault:

- **“Do Not Enter - Limited Access Area – Access Limited To Authorized Personnel Only”**

Signs shall be a minimum of twelve inches in height and twelve inches in length.



RECALL MANUAL

RECALL PROGRAM AND PROCEDURES

**THIS RECALL MANUAL OUTLINES THE REQUIREMENTS AND STEPS TO BE TAKEN
IN THE EVENT OF A PRODUCT RECALL AND/OR WITHDRAWAL.**

curaleaf

Compliance Mechanisms

*This manual was created to house the curaleaf compliance procedures upon licensing. The contents of the manuals presented in this RFA, and those manuals, protocols and procedures created thereafter will be organized according to the regulations for ease of operation and inspection.

Sec. 21a-408-56. Packaging and labeling by producer

(a) A producer shall individually package, label and seal marijuana products in unit sizes such that no single unit contains more than a one-month supply of marijuana.

(b) A producer shall place any product containing marijuana in a child-resistant and light-resistant package. A package shall be deemed child-resistant if it satisfies the standard for “special packaging” as set forth in the Poison Prevention Packaging Act of 1970 Regulations, 16 CFR 1700.1(b)(4).

(c) A producer shall label each marijuana product prior to sale to a dispensary and shall securely affix to the package a label that states in legible English:

(1) The name and address of the producer;

(2) The brand name of the marijuana product that was registered with the department pursuant to section 21a-408-59 of the Regulations of Connecticut State Agencies;

(3) A unique serial number that will match the product with a producer batch and lot number so as to facilitate any warnings or recalls the department or producer deem appropriate;

(4) The date of final testing and packaging;

(5) The expiration date;

(6) The quantity of marijuana contained therein;

(7) A terpenes profile and a list of all active ingredients, including:

(A) tetrahydrocannabinol (THC);

(B) tetrahydrocannabinol acid (THCA);

(C) cannabidiol (CBD);

(D) cannabidiolic acid (CBDA); and

(E) any other active ingredient that constitute at least 1% of the marijuana batch used in the product.

(8) A pass or fail rating based on the laboratory’s microbiological, mycotoxins, heavy metals and chemical residue analysis; and

(9) Such other information necessary to comply with state of Connecticut labeling requirements for similar products not containing marijuana, including but not limited to the Connecticut Food, Drug and Cosmetic Act, Connecticut General Statutes, sections 21a-91 to 21a-120, inclusive, and Connecticut General Statutes, sections 21a-151 to 21a-159, inclusive, regarding bakeries and food manufacturing establishments.

(d) A producer shall not label marijuana products as “organic” unless the marijuana plants have been organically grown as defined in section 21a-92 of the Connecticut General Statutes and the marijuana products have been produced, processed, manufactured and certified to be consistent with organic standards in compliance with section 21a-92a of the Connecticut General Statutes.

[REDACTED] diligently adheres to all labeling requirements and will allow dispensaries and production facilities to include all required information and disclaimers mentioned in the sections above. [REDACTED] current batch tracking and test result logging structure already allows discrete packages of inventory to carry unique details including expiration dates and cannabinoid profiles.

Sec. 21a-408-49. Electronic system record-keeping safeguards

(a) If a dispensary facility uses an electronic system for the storage and retrieval of patient information or other marijuana records, the dispensary facility shall use a system that:

- (1) Guarantees the confidentiality of the information contained therein;
 - (2) Is capable of providing safeguards against erasures and unauthorized changes in data after the information has been entered and verified by the dispensary;
- and
- (3) Is capable of being reconstructed in the event of a computer malfunction or accident resulting in the destruction of the data bank.

[REDACTED] is securely hosted and is subject to frequent backups and HIPAA compliance. Changes made to records within the system can be traced to specific users, ensuring peace of mind that data will be preserved and protected against unauthorized access.

Sec. 21a-408-54. Producer record keeping

Producers shall keep records of all marijuana produced or manufactured and of all marijuana disposed of by them. Such records shall be maintained and made available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies and, in each case shall show:

- (1) The brand name, kind and quantity of marijuana involved;
- (2) The date of such production or removal from production;
- (3) A record of all marijuana sold, transported or otherwise disposed of;
- (4) The date and time of selling, transporting or disposing of the marijuana;
- (5) The name and address of the dispensary facility to which the marijuana was sold;
- (6) The name of the dispensary who took custody of the marijuana; and
- (7) The name of the production facility employee responsible for transporting the marijuana.

[REDACTED] serves as a thorough database of current and historic inventory and transactional data. The software features a suite of prepared reports, and its robust reporting engine allows dispensary ownership to produce custom reports as required. Should the state create its own custom form, we will strive to build it and incorporate it into the system.

Sec. 21a-408-58. Laboratory testing

(a) Immediately prior to manufacturing any marijuana product or packaging raw marijuana for sale to a dispensary, a producer shall segregate all harvested marijuana into homogenized batches.

(b) A producer shall make available each such batch at the production facility for a laboratory employee to select a random sample. The laboratory shall test each sample for microbiological contaminants, mycotoxins, heavy metals and pesticide chemical residue, and for purposes of conducting an active ingredient analysis.

(c) From the time that a batch of marijuana has been homogenized for sample testing and eventual packaging and sale to a dispensary facility, until the laboratory provides the results from its tests and analysis, the producer shall segregate and withhold from use the entire batch of marijuana, except the samples that have been removed by the laboratory for testing. During this period of segregation, the producer shall maintain the marijuana batch in a secure, cool and dry location so as to prevent the marijuana from becoming contaminated or losing its efficacy. Under no circumstances shall a producer include marijuana in a marijuana product or sell it to a dispensary facility prior to the time that the laboratory has completed its testing and analysis and provided those results, in writing, to the producer or other designated production facility employee.

(d) A laboratory shall immediately return or dispose of any marijuana upon the completion of any testing, use, or research. If a laboratory disposes of marijuana, the laboratory shall comply with 21a-408-64 of the Regulations of Connecticut State Agencies.

(e) If a sample of marijuana does not pass the microbiological, mycotoxin, heavy metal or pesticide chemical residue test, based on the standards set forth in this subsection, the producer shall dispose of the entire batch from which the sample was taken in accordance with section 21a-408-64 of the Regulations of Connecticut State Agencies.

(1) For purposes of the microbiological test, a marijuana sample shall be deemed to have passed if it satisfies the standards set forth in Section 1111 of the United States Pharmacopeia, which can be obtained at <http://www.usp.org>.

(2) For purposes of the mycotoxin test, a marijuana sample shall be deemed to have passed if it meets the following standards:

Test	Specification
AlfatoxinB1	<20uG/KGofSubstance
AlfatoxinB2	<20uG/KGofSubstance
AlfatoxinO1	<20uG/KGofSubstance
AlfatoxinO2	<20uG/KGofSubstance
OchratoxinA	<20uG/KGofSubstance

(3) For purposes of the heavy metal test, a marijuana sample shall be deemed to have passed if it meets the following standards:

Metal	NaturalHealthProductsAcceptablelimitsuG/KGBW/Day
Arsenic	<0.14
Cadmium	<0.09
Lead	<0.29
Mercury	<0.29

(4) For purposes of the pesticide chemical residue test, a marijuana sample shall be deemed to have passed if it satisfies the most stringent acceptable standard for a pesticide chemical residue in any food item as set forth in Subpart C of the federal Environmental Protection Agency's regulations for Tolerances and Exemptions for Pesticide Chemical Residues in Food, 40 CFR 180.

(f) If a sample of marijuana passes the microbiological, mycotoxin, heavy metal and pesticide chemical residue test, the laboratory shall release the entire batch for immediate manufacturing, packaging and labeling for sale to a dispensary facility.

(g) The laboratory shall file with the department an electronic copy of each laboratory test result for any batch that does not pass the microbiological, mycotoxin, heavy metal or pesticide chemical residue test, at the same time that it transmits those results to the producer. In addition, the laboratory shall maintain the laboratory test results and make them available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.

(h) A producer shall provide to a dispensary facility the laboratory test results for each batch of marijuana used in a product purchased by the dispensary facility. Each dispensary facility shall have such laboratory results available upon request to qualifying patients, primary caregivers and physicians who have certified qualifying patients.

allows a dispensary to attach test data to individual batches within the dispensary's inventory, ensuring that each unit of inventory can be correctly assigned a necessary test profile.

Sec. 21a-408-59. Brand name

(a) A producer shall assign a brand name to each marijuana product. A producer shall register each brand name with the department, on a form prescribed by the commissioner, prior to any sale to a dispensary facility and shall associate each brand name with a specific laboratory test that includes a terpenes profile and a list of all active ingredients, including:

- (1) Tetrahydrocannabinol (THC);
- (2) Tetrahydrocannabinol acid (THCA);
- (3) Cannabidiols (CBD);
- (4) Cannabidiolic acid (CBDA); and
- (5) Any other active ingredient that constitutes at least 1% of the marijuana batch used in the product.

(b) A producer shall not label two marijuana products with the same brand name unless the laboratory test results for each product indicate that they contain the same level of each active ingredient listed within subsection (a)(1) to (4), inclusive, of this section within a range of 97% to 103%.

(c) The department shall not register any brand name that:

- (1) Is identical to, or confusingly similar to, the name of an existing non-marijuana product;
- (2) Is identical to, or confusingly similar to, the name of an unlawful product or substance;
- (3) Is confusingly similar to the name of a previously approved marijuana product brand name;
- (4) Is obscene or indecent;
- (5) May encourage the use of marijuana for recreational purposes;
- (6) May encourage the use of marijuana for a condition other than a debilitating medical condition;
- (7) Is customarily associated with persons under the age of 18; or
- (8) Is related to the benefits, safety or efficacy of the marijuana product unless supported by substantial evidence or substantial clinical data.

_____ allows cultivators and dispensaries to establish strains within the database and attach them to batch information, along with potency and contamination testing performed on a batch by batch basis.

Sec. 21a-408-60. Transportation of marijuana

- (a) Prior to transporting any marijuana or marijuana product, a producer shall:
- (1) Complete a shipping manifest using a form prescribed by the commissioner; and
 - (2) Securely transmit a copy of the manifest to the dispensary facility that will receive the products and to the department at least twenty-four hours prior to transport.
- (b) The producer and dispensary facility shall maintain all shipping manifests and make them available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.
- (c) A producer shall only transport marijuana products:
- (1) In a locked, safe and secure storage compartment that is part of the vehicle transporting the marijuana; and
 - (2) In a storage compartment that is not visible from outside the vehicle.
- (d) A production facility employee, when transporting marijuana, shall travel directly from the producer facility to the dispensary facility and shall not make any stops in between, except to other dispensary facilities.
- (e) A producer shall ensure that all delivery times and routes are randomized.
- (f) A producer shall staff all transport vehicles with a minimum of two employees. At least one delivery team member shall remain with the vehicle at all times that the vehicle contains marijuana.
- (g) A delivery team member shall have access to a secure form of communication with employees at the production facility at all times that the vehicle contains marijuana.
- (h) A delivery team member shall possess a department-issued identification card at all times when transporting or delivering marijuana and shall produce it to the commissioner, the commissioner's authorized representative or law enforcement official upon request.

[REDACTED] generates manifest documentation to use in declaring product transport. In case of the state requiring a specifically-formatted transport manifest, we will happily reproduce the document to match required information and formatting.

Sec. 21a-408-65. Inventory

- (a) Each dispensary facility and production facility, prior to commencing business, shall:
- (1) Conduct an initial comprehensive inventory of all marijuana at the facility. If a facility commences business with no marijuana on hand, the dispensary or producer shall record this fact as the initial inventory; and
 - (2) Establish ongoing inventory controls and procedures for the conduct of inventory reviews and comprehensive inventories of marijuana, which shall enable the facility to detect any diversion, theft or loss in a timely manner.
- (b) Upon commencing business, each dispensary facility and production facility shall conduct a weekly inventory of marijuana stock, which shall include, at a minimum, the date of the inventory, a summary of the inventory findings, the name, signature and title of the individuals who conducted the inventory, the date of receipt of marijuana, the name and address of the producer from whom received, where applicable, and the kind and quantity of marijuana received. The record of all marijuana sold, dispensed or otherwise disposed of shall show the date of sale, the name of the dispensary facility, qualifying patient or primary caregiver to whom the marijuana was sold, the address of such person and the brand and quantity of marijuana sold.
- (c) A complete and accurate record of all stocks or brands of marijuana on hand shall be prepared annually on the anniversary of the initial inventory or such other date that the dispensary facility manager or producer may choose, so long as it is not more than one year following the prior year's inventory.
- (d) All inventories, procedures and other documents required by this section shall be maintained on the premises and made available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.
- (e) Whenever any sample or record is removed by a person authorized to enforce the provisions of sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies or the provisions of the state of Connecticut food, drug and cosmetic statutes and regulations for the purpose of investigation or as evidence, such person shall tender a receipt in lieu thereof and the receipt shall be kept for a period of at least three years.

[REDACTED] a robust inventory reconciliation tool, allowing a dispensary to run regular inventories of all stock stored at the dispensary and recording historical information so that management may refer back to any past reconciliation to see a summary of changes made. In addition, management may also perform manual inventory adjustments when a full reconciliation is unnecessary. To complement this, the system includes a thorough transaction history report which can be used to review all changes to inventory, including time, date, and user recording the change.



CURALEAF SECURITY PLAN

CuraLeaf will employ a holistic security plan to include the three main security elements of physical security, policies and procedures, and personnel. The plan will meet all the security requirements as outlined in Connecticut Regulations Sections 21a-408-53, 21a-408-60, 21a-408-61, 21a-408-62, 21a-408-63, and 21a-262-1 as described below. In addition, the plan will include many elements not specifically required in the Connecticut Regulations but in CuraLeaf's opinion essential to the intent of securing the facility and its contents. Not only will security requirements for the startup of the facility be addressed, but also ongoing security requirements such as risk assessments, quality control, and performance metrics will be included.

To assist in the development and implementation of this security plan, CuraLeaf will employ the services of a professional security consulting firm identified in this application with expertise in all three main security elements and experience in developing and implementing such a plan for both pharmaceutical and high risk facilities. Services will include physical security system design specification development, security command center design, installation project management and oversight services, development of security policies, development of risk assessment and quality control methodology and its implementation, and development of security personnel program to include security staffing levels, post order development, equipment, and training criteria.



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EMPLOYEE HANDBOOK

Revised: November 5, 2013

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Employee Education

(For educational purposes only)

Patient's Bill of Rights

- Patients have a right to respectful care.
- Patients have the right to be informed about their diagnosis, to know what their treatment options are, and know what the potential outcomes of each treatment would be.
- Patients have the right to know the names of those treating you.
- Patients have the right to refuse a treatment.
- Patients have the right to privacy.
- Patients have a right to access their medical records.
- Patients have a right to know what kinds of alternative care options you have.
- Patients are responsible for providing all information about past care, illnesses and medicines to their physician when he or she is trying to find out the best possible treatment for you.



Environmental Health & Safety Plan

Adopted November 9, 2013

Purpose and Responsibility

PURPOSE

Curaleaf has a written health and safety program for employees, based on clearly stated goals or objectives, that promotes safe and healthful working conditions. The program is intended to provide managers, supervisors, and employees with a clear and firm understanding of the Curaleaf's concern for protecting employees from job-related injuries and illnesses; preventing accidents and fires; planning for emergencies and emergency medical procedures; identifying and controlling physical, chemical, and biological hazards in the workplace; communicating potential hazards to employees; and maintaining a sanitary environment.

POLICY

Curaleaf is committed to providing a safe and healthful environment for all persons associated with the company, including staff, contractors, visitors, and members of the greater Simsbury community.

Curaleaf emphasizes an integrated systems approach, as well as safety education and training as the primary means of achieving this goal. The Environment, Health and Safety department is primarily responsible for environment, health and safety functions, by developing EHS programs and performing various periodic inspections. Senior management, department managers, and supervisors are considered directly responsible for maintaining full compliance with State and Federal regulations and Curaleaf safety policies and procedures.

RESPONSIBILITIES

Management

Curaleaf Management has established a written Employee Workplace Requirements Program for Safety and Health that contains the following information:

- Methods to be used to identify, analyze, and control new or existing hazards, conditions, and operations.
- Responsibilities of managers, supervisors, and employees for implementing the program, controlling accident-related expenditures, and methods to establish, measure, and maintain continued participation of management and employees.

- Methods to communicate the plan to all affected employees so that they are informed of work-related physical, chemical, or biological hazards, and controls necessary to prevent injury or illness.
- Programs for training managers, supervisors, and employees in avoidance of job-related injuries and health impairments.
- Methods for reporting and investigating workplace accidents and implementing corrective actions.
- Methods to communicate and enforce safe work practices and rules.
- Types of safety and health training programs that will be made available to employees.
- Methods for employees to make complaints concerning safety and health problems without fear of retaliation.
- Methods for employees to receive medical attention following a work-related injury or illness.
- Establishment of Environment, Health and Safety Committee(s) to perform workplace inspections, review injury and illness records, make advisory recommendations to the Senior Management Team and perform other functions necessary for the effective implementation of the Employee Workplace Environment, Health and Safety Program.

Environment, Health and Safety Officer

The Director of the Environment, Health and Safety Office is responsible for implementation of the Curaleaf EHS Program and the development of additional environment, health and/or safety procedures necessary to meet the special situations that are unique to a Curaleaf's medical marijuana production facility.

Specific responsibilities include:

- Development of an EHS management system which utilizes risk assessment methodology for use in correcting workplace hazards on a priority basis throughout the company.

- Maintenance of an environment, health and safety documentation system for review of effectiveness.
- Establishment of long-range environment, health and safety goals. Submission of an annual report to the Senior Management Team and Board of Directors, indicating achievements and annual goals and objectives.

Supervisors

Each supervisor is responsible for providing safe working conditions for those being supervised and for following up on reports of violations of safe working conditions. Each supervisor is also responsible for knowing the environment, health and safety guidelines, investigating accidents, reporting incidents, ensuring that employees attend safety training, reviewing and providing staff with personal protective equipment, provide job-specific safety training, and properly advising higher management of appropriate situations.

The environment, health and safety program is the responsibility of each employee, supervisor, and manager and should be an important factor in evaluating the work performance of each.

Employees

Each employee is to place environment, health and safety requirements as first in importance in the performance of his or her work duties for Curaleaf. The protection of fellow employees and the public on Curaleaf property is a shared responsibility of every employee.

An employee is responsible for notifying his/her immediate supervisor of a violation or deficiency in safe and healthful working conditions and for recommending corrective measures, if possible. Additionally, the employee's immediate supervisor is to be notified of every injury or accident regardless of how trivial such accident may appear at that time. Specific responsibilities are:

- Curaleaf conducts an environment, health and safety program for the purpose of preventing injuries to employees, protecting the health of its employees and damage to property.
- Every employee is required to participate in the Curaleaf EHS program.

- Quality service with EHS is the cornerstone of the Curaleaf program.
- Safety instructions and rules are to be followed. Safety devices installed and safety equipment provided are to be used. Defective tools and other equipment without proper guarding are not to be used.
- Unsafe conditions or practices are to be reported to the immediate supervisor.
- All injuries occurring on the job and any workplace related illnesses are to be reported promptly and in writing to the supervisor and to Human Resources. Questions concerning medical treatment of these injuries/illnesses should also be addressed to the supervisor.
- All employees or escorted visitors entering a designated hazardous, caution, or restricted area are required to use appropriate personal protective equipment and adhere to environment, health and safety procedures immediately upon access to the area.
- All fires, accidental damage to property, hazardous material spills and other emergency occurrences no matter how slight must be reported to EHS.
- All hazardous materials are to be disposed of according to Curaleaf procedures, in compliance with State and federal regulations. Supervisors and/or EHS can provide advice regarding proper disposal method and practices.
- Working under the influence of alcohol or illegal drugs is specifically forbidden.
- Failure to comply with or enforce environment, health and safety rules and regulations may result in disciplinary action up to and including dismissal. Violation of work rules is a job performance issue and is to be dealt with through the job performance disciplinary process.
- All employees are required to attend New Employee Safety Orientation for their designated work environment within 30 days of employment.

Ergonomic Program

INTRODUCTION

Curaleaf is committed to providing a safe and healthful environment for its employees by developing an ergonomic program that identifies workplace stressors and minimizes their consequences.

DEFINITION

Ergonomics is a multidisciplinary activity dealing with the interactions between a person and their work environment.

BACKGROUND INFORMATION

Ergonomic Stressors

Poor workplace designs can present ergonomic risk factors called stressors. These stressors include but are not limited to repetition, force, and extreme postures.

- Repetition- the number of motions or movements that are performed per cycle or per shift.
- Force- the muscles used to produce force in order to perform necessary activities such as lifting, grasping, pinching and pushing
- Extreme Postures- muscles are required to work at a level near or at their maximum capacity.

Employee exposure to these stressors may cause injury or lead to the development of Musculoskeletal Disorders.

SYMPTOMS OF MUSCULOSKELETAL DISORDERS (MSD)

Symptoms of MSD identify that an ergonomic hazard is present. There may be individual difference in susceptibility and symptoms among employees performing similar tasks. Any symptoms are to be taken seriously. The following list of symptoms can be but are not limited to:

- Numbness
- Tightness
- Tingling
- Swelling
- Pain
- Stiffness
- Redness

WORK STRATEGY CONTROLS

When an ergonomic hazard has been identified, the Environment, Health and Safety Office will work with the department in eliminating or minimizing the hazard. There are two general approaches to controlling ergonomic hazards: Engineering and Administrative.

- Engineering Controls: Are changes made to the workstations, tools, and/or machinery that alter the physical composition of area or process.
- Administrative Controls: Are changes made to regulate exposure without making physical changes to the area or process, for example job rotation and frequent breaks.

RESPONSIBILITIES

All employees are responsible for attending training on ergonomics and for following proper work practices.

Departments are responsible for providing sufficient resources to implement ergonomic recommendations in a timely manner as well as ensuring that employees are properly trained.

Environmental Health and Safety is responsible for evaluating and monitoring the ergonomic program including assessing the nature and extent of ergonomic hazards, recommending ways of minimizing or controlling these hazards, and support the company in consultation and direction regarding ergonomics. The EHS is also responsible for ensuring that training on ergonomics is available to all employees.

MEDICAL MANAGEMENT

If an employee is experiencing any signs or symptoms of musculoskeletal disorders, the employee is to report their symptoms to their supervisor and consult the **Occupational Health Clinic** for a medical evaluation. The clinic will advise the employee, their supervisor, and EHS of the necessary follow-up.

TRAINING

EHS will provide ergonomic training to all employees in the EHS New Employee Orientation Safety Program. The training program will include but not be limited to definition of ergonomics, ergo stressors, types of musculoskeletal disorders (MSD), symptoms of MSD, reporting, and work strategy control. Job specific ergonomic training programs will be presented to Departments upon request.

OBTAINING ASSISTANCE

Employees, Supervisors and Department Heads may request an ergonomic assessment of work area(s) or work process(es) by contacting the EHS at XXX-XXX-XXXX. The staff will conduct an ergonomic evaluation and provide a written assessment providing guidance on eliminating or reducing ergonomic risk factors to the employee and his/her supervisor.

Sanitation

HOUSEKEEPING

- All offices, hallways and common areas are cleaned regularly by Housekeeping.
- Floors in work areas are maintained, so far as practicable, in a dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places shall be provided, where practicable, or appropriate waterproof footwear shall be provided.
- To facilitate cleaning, every floor, working place and passageway is to be kept free from protruding nails, splinters, loose boards and unnecessary holes and openings.

WASTE DISPOSAL

- Waste receptacles used for decaying solid or liquid waste or refuse, are constructed so that they do not leak and may be thoroughly cleaned and maintained in a sanitary condition. Such a receptacle is to be equipped with a solid tight-fitting cover, unless it can be maintained in a sanitary condition without a cover. Waste receptacles for ordinary office waste are to be provided by the department. Special waste containers for hazardous chemical radioactive, and other such waste must

meet specifications of the Environment, Health and Safety Office.

- All sweepings, solid or liquid wastes, refuse and garbage are removed according to a schedule developed by Facilities Services in such a manner as to avoid creating a menace to health and to maintain the place of employment in a sanitary condition.
- Curaleaf will provide recycling containers and encourage staff to recycle materials in accordance with local guidelines.

VERMIN CONTROL

- Every enclosed workplace is constructed, equipped and maintained, so far as reasonably practicable, so as to prevent the entrance of and harboring of rodents, insects and other vermin.
- The Facilities Services Division conducts a continuing extermination program to prevent the presence of vermin.

WATER SUPPLY

- Potable water is to be provided in all places of employment for drinking, washing of the person, cooking, washing of foods, washing of cooking or eating utensils, washing of food preparation or processing premises, and personal service rooms.
- Potable drinking water dispensers are to be designed, constructed and serviced so that sanitary conditions are maintained, shall be capable of being closed and shall be equipped with a tap. Open containers for drinking water from which water must be dipped or poured, whether or not they are fitted with a cover, are prohibited.

TOILET FACILITIES

- Toilet facilities, in toilet rooms separate for each sex, are provided in all places of employment.
- The number of facilities provided for each sex is based on the number of employees of that sex for whom the facilities are furnished. Where toilet rooms occupied by no more than one person at a time, can be locked from the inside and contain at least one water closet, separate toilet Sewage disposal methods do not endanger the health of employees.
- Each water closet is to occupy a separate compartment with a

door and walls or partitions between fixtures sufficiently high to assure privacy.

WASHING FACILITIES

- Lavatories are made available in all places of employment.
- Each lavatory is to be provided with hot, cold or tepid running water.
- Hand soap or similar cleansing agent is to be provided.
- Individual hand towels or sections thereof, of cloth or paper, warm air blowers or clean individual sections of continuous cloth toweling convenient to the lavatories, is to be provided.

SHOWERS

- Whenever showers are required, one shower is to be provided for each 10 employees of each sex, or numerical fraction thereof, who are required to shower during the same shift.
- Body soap or other appropriate cleaning agents convenient to the shower are to be provided.
- Showers are to be provided with hot and cold running water feeding a common discharge line.
- Employees who use showers are to be provided with individual clean towels.

CONSUMPTION OF FOOD AND BEVERAGE ON PREMISES

Food and beverages may be consumed in designated areas only. It is specifically prohibited from all cultivation, production, laboratory, storage and sanitary facilities.

Fire Emergency Procedure

PURPOSE

Preparation is a critical factor in successful evacuation in a fire emergency.

DETAILS

The Curaleaf Emergency Evacuation Plan contains the following:

- Requirements for audible alarms and visual alarms (as needed in areas of elevated noise)
- Emergency evacuation routes and designated meeting spots
- Procedure for accounting of employees, contractors and visitors
- Requirements for posting evacuation routes
- Exercising emergency evacuation procedures and appropriate

documentation.

First Aid

OSHA REGULATIONS

The OSHA General Industry Standard, CFR 1910.151, requires:

- employers must ensure the ready availability of medical personnel for advice and consultation on matters of occupational health;
- in the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.
- where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate use.

POLICY

Curaleaf encourages departments to make first aid kits available to employees for treatment of minor cuts and scratches. The availability of first aid supplies is not to be used as a substitute for obtaining appropriate medical treatment.

FIRST AID KIT

A basic first kit should be wall mounted and contain the following recommended items:

- Alcohol pads
- Antiseptic wipes
- Different sized band aids/bandages (latex free)
- Optional instant cold pack

Egress and Life Safety Policy

EGRESS AND LIFE SAFETY POLICY

Curaleaf and its Department of Environment, Health and Safety (EHS) are committed to the health and safety of its employees, contractors and visitors. It is therefore critical that the means of egress in Curaleaf buildings be maintained and unobstructed to ensure safe emergency evacuation of occupants, as well as allow access for emergency

responders.

EGRESS AND LIFE SAFETY STANDARDS

Exit accesses and discharges must be free from obstructions or impediments to full instant use in case of a fire or other emergency. Unobstructed hallways, stairwells and exits are necessary to provide access for emergency responders in a medical, fire or other emergency, including access to fire panels and building utilities. To comply with state and federal regulations, Curaleaf policy prohibits the storage of items - even on a temporary basis - in hallways, mechanical rooms, building common areas, paths of egress identified by "EXIT" signs, aisles which lead to exits, or loading dock areas in the immediate vicinity of an exit. Areas that may be used for evacuation must be kept clear at all times. The areas described above may never be used for the purpose of storage of tables, chairs, bookcases, or any kind of furniture or equipment.

RESPONSIBILITY FOR SAFE EGRESS

Employees, contractors and visitors are responsible for following Curaleaf procedures to maintain safe hallways, stairways and exits.

Portable Fire Extinguishers

GENERAL

The provisions of this policy apply to the selection, distribution, inspection, maintenance and testing of portable extinguishing equipment. The requirements given herein are minimums. Portable extinguishers are intended as a first line of defense to cope with fires of limited size. They are needed even when a facility is equipped with automatic sprinklers, standpipe and hose, or other fixed protection equipment. Fire extinguisher training is provided annually by EHS.

DEFINITIONS

The basic types of fires are Classes A, B, C, and D as defined in the following:

Class A

Combustible materials, such as wood, cloth, paper, rubber, and many

plastics.

Class B

Flammable and combustible liquids.

Class C

Energized electrical equipment.

Class D

Combustible metals, such as magnesium, titanium, zirconium, sodium, and potassium.

CLASSIFICATION AND RATINGS OF FIRE EXTINGUISHERS

Portable fire extinguishers are classified for use on Class A, B, C, or D fires and rated by nationally recognized testing laboratories for relative extinguishing effectiveness. The classification and rating are based upon the preceding classification of fires and the fire extinguishment potentials as determined by fire tests.

SELECTION OF EXTINGUISHERS

The selection of extinguishers for a given situation is determined by the character of the fires anticipated.

MOUNTING LOCATIONS

Extinguishers shall be conspicuously located where they will be readily accessible in the event of fire. They shall be located along normal paths of travel, including exits from an area. Fire protection and fire detection equipment shall not be obstructed.

INSPECTIONS

Extinguishers are to be visually inspected and the inspection documented monthly by departmental personnel.

MAINTENANCE

Extinguishers needing to be recharged due to use or pressure leakage will be recharged or replaced by EHS.

Storage and Use of Flammable and Combustible Liquids

GENERAL

It is the policy of Curaleaf to use the recommendations contained in

the National Fire Protection Association (NFPA) Codes as minimum guidelines to acceptable practices in the facility. A number of the NFPA Codes have been incorporated into the Occupational Safety and Health Act (OSHA) Standards, the Connecticut State Building Code, or are mandated as a condition of insurance coverage by the Connecticut Department of Insurance. Questions regarding the applicability of specific NFPA Codes should be directed to EHS and the State Fire Marshal.

The purpose of this policy statement is to list the basic standards for the storage and use of flammable and combustible liquids applicable to Curaleaf operations.

DEFINITIONS

Laboratory Unit

A laboratory unit is defined as a room, or suite of rooms, separated from adjacent areas by walls and doors having at least a one-hour fire rating.

Flash Point

The minimum temperature at which, a liquid gives off vapor in sufficient concentration to form an ignitable mixture in air.

Flammable Liquids

A flammable liquid is any liquid having a flash point below 100°F (37.8°C). Flammable liquids are also known as Class I liquids and subdivided according to flash point and boiling point as indicated in the table below.

Combustible Liquids

A combustible liquid is any liquid having a flash point at or above 100°F, and is known as a Class II or III liquid as indicated below:

Combustible liquids shall be divided into two classes as follows:

1. **Class II liquids** shall include those with flash points at or above 100°F (37.8°C) and below 140°F (60°C), except any mixture having components with flash points of 200°F (93.3°C) or higher, the volume of which make up 99 percent or more of the total volume of the mixture.
2. **Class III liquids** shall include those with flash points at or above 140°F (60°C). Class III liquids are subdivided into two subclasses:
 - **Class IIIA liquids** shall include those with flash points at or

above 140°F (60°C) and below 200°F (93.3°C), except any mixture having components with flash points of 200°F (93.3°C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

- **Class IIIB liquids** shall include those with flash points at or above 200°F (93.3°C). This section does not regulate Class IIIB liquids. Where the term "Class III liquids" is used in this section, it shall mean only Class IIIA liquids.

When a combustible liquid is heated to within 30°F (16.7°C) of its flash point, it shall be handled in accordance with the requirements for the next lower class of liquids.

Flammable liquid: any liquid having a flash point below 100°F (37.8°C), except any mixture having components with flashpoints of 100°F (37.8°C) or higher, the total of which make up 99 percent or more of the total volume of the mixture. Flammable liquids shall be known as Class I liquids. Class I liquids are divided into three classes as follows:

1. **Class IA** shall include liquids having flash points below 73°F (22.8°C) and having a boiling point below 100°F (37.8°C).
2. **Class IB** shall include liquids having flash points below 73°F (22.8°C) and having a boiling point at or above 100°F (37.8°C).
3. **Class IC** shall include liquids having flash points at or above 73°F (22.8°C) and below 100°F (37.8°C).

MAXIMUM CONTAINER SIZE FOR POINT OF USE STORAGE

The potential fire hazard depends on the flash point and the quantity of liquid being used. The following table gives the maximum size container allowed for each class of liquid.

Class

- | | | | | | | |
|---|---------------------------|--------|--------|--------|--------|--------|
| • | Container Type | IA | IB | IC | II | III |
| • | Glass | 1 pt. | 1 qt. | 1 qt. | 1 gal. | 1 gal. |
| • | Metal or Approved Plastic | 1 gal. | 5 gal. | 5 gal. | 5 gal. | 5 gal. |
| • | Safety Cans | 2 gal. | 5 gal. | 5 gal. | 5 gal. | 5 gal. |

MAXIMUM QUANTITIES

The potential fire hazard also depends on the total quantity of flammable and combustible liquids present within a containment unit and the type of containers in which the liquids are stored.

The maximum quantity allowed per unit is as follows:

- Shelf or open storage/use:

- Glass, plastic, or cans: 10 gallons
- Safety cans: 25 gallons
- Approved storage cabinets (maximum 2 per lab unit)
 - Class: 30 gallons
 - Class I & II & III: 60 gallons
- Inside Storage Room (meeting NFPA Code recommendations)
 - with sprinkler: 4 10 gal/ft²
 - without sprinkler: 2 4 gal/ft²

SAFETY CANS

Gasoline must be stored and transported in safety cans. The use of safety cans in laboratories, where applicable is strongly encouraged.

SOLVENT STORAGE CABINETS

Storage cabinets constructed to NFPA standards should be used when required by quantity limits. Storage cabinets are not permitted in hallways.

REFRIGERATORS

Flammable liquids must not be stored in domestic type refrigerators. Domestic type refrigerators should not be purchased for laboratory use, even if flammable storage is not contemplated, since future research needs may require the use of flammables. Safety refrigerators, which have the electrical contacts (door switch, light, thermostat, etc.) removed or exteriorized, are recommended for laboratory use. "Explosion Proof" refrigerators are not recommended except in unusual circumstances, such as in an inside storage room (for flammables) or in potentially hazardous atmospheres.

WARNING SIGNS

Bunsen burners and other open flames must not be used in the area where flammable liquids are being used. The area must be posted "NO SMOKING" and containers are to be labeled "DANGER FLAMMABLE - KEEP AWAY FROM HEAT, SPARKS, AND OPEN FLAMES. KEEP CLOSED WHEN NOT IN USE."

Sign and Tag Requirements for Accident Prevention

GENERAL

The American National Standards Institute (ANSI) Standard Z53.1, Safety Color Code for Marking Physical Hazards, and the identification

of certain equipment specifies standard colors and signs to be used in a safety and health program. The State's Work Place Requirements Program for Safety and Health adopts ANSI Z53.1 in order to provide uniformity throughout the facility.

REQUIREMENT

Color Code

- **Red** is recommended for identifying fire protection equipment, danger and emergency stops on machines.
- **Yellow** because of its high visibility is the standard color for marking hazards that may result in accidents from slipping, falling, striking against, etc.
- **Green** in combination with white, such as the green cross on a white background, designates the location of first aid and safety equipment.
- **Black and White** and combinations of the two in strips or checks are used for housekeeping and traffic markings.
- **Orange** is the standard color to highlight hazardous parts of machines or electrical equipment, such as exposed edges of cutting devices, the inside of removed guards, and the doors and covers of switch boxes.
- **Magenta** identifies radiation hazards, such as radioactive materials, in rooms and containers.

Signs and Tags

Signs are not to be considered as the final step to be taken against hazards. Whenever possible, the hazards are to be eliminated.

General: Signs and symbols required by this section must be visible at all times when work is being performed and shall be removed or covered promptly when the hazards no longer exist.

Danger Signs:

Danger signs must be used only where an immediate hazard exists. Danger signs must have red as the predominant color for the upper panel, black outline on the borders and a white lower panel for additional sign wording.

Caution Signs:

Caution signs shall be used only to warn against potential hazards or to caution against unsafe practices.

Caution signs shall have yellow as the predominant color, black upper

panel and borders, yellow lettering or "caution" on the black panel, and the lower yellow panel for additional sign wording. Black lettering shall be used for additional wording.

Safety Instruction Signs:

Safety instruction signs, when used, must be white with green upper panel and white letters to convey the principal message. Any additional wording on the sign shall be black letters on the white background.

Exit Signs: Exit signs, when required, must be lettered in legible red letters not less than 6 inches high on a white field and the principal stroke of the letters must be at least three fourths of an inch wide.

Biological Hazard Symbol:

For the purpose of this standard the term "Biological Hazard" or biohazard shall include only those infectious agents presenting a risk or potential risk to the well being of man.

The biological hazard warning symbol must be used to signify the actual or potential presence of a biohazard and to identify equipment, containers, rooms, materials or combinations thereof which contain or are contaminated with viable hazardous agents.

This symbol may be a fluorescent orange or orange red color with the background color optional. Each sign shall have the appropriate wording identifying the nature of the hazard involved, name of individual responsible for its control and precautionary information.

Chemical Carcinogen Signs:

Entrances to regulated areas as defined in OSHA Standard 29 CFR Part 1910, Subpart Z shall be posted with signs bearing the legend: **CANCER - SUSPECT AGENT**
AUTHORIZED PERSONNEL ONLY

Containers shall have the warning words "CANCER - SUSPECT AGENT" displayed immediately under the contents identification.

Accident Prevention Tags

The tags are a temporary means of warning all concerned of a hazardous condition, defective equipment, radiation hazards, etc. The tags are not to be considered as a complete warning method but should be used until a positive means can be employed to eliminate the hazard; for example, a "DO NOT START" tag on power equipment shall be used for a very short time until the switch in the system can

be locked out.

Industrial Hygiene Program Requirements

INTRODUCTION

Curaleaf is committed to protecting its employees from environmental hazards that arise out of or during the course of employment.

The industrial hygiene program deals with the recognition, evaluation, and control of environmental health hazards. Environmental health hazards may include conditions which cause legally compensable illnesses, or any conditions in the work environment that impair the health of employees to the extent that they lose work and/or efficiency.

The program provides industrial hygiene surveys and monitoring to identify hazards, inspections, and other information necessary to control the recognized health hazards.

OCCUPATIONAL HEALTH HAZARDS

Measures are provided for the control of hazards such as:

- Chemical (29 CFR 1910.1000): Liquids, dusts, fumes, mists, vapors, or gases. The three routes of entry into the body being inhalation, skin absorption, and ingestion.
- Physical: Non-ionizing radiation, noise, pressure, vibration, illumination, and temperature extremes.
- Biological: Viruses, bacteria, fungi, and insects.

RECORD KEEPING

Records of all survey results and employee exposures are maintained at the Department of Environment, Health and Safety. Record keeping is particularly important in the area of occupational health hazards where the effects of exposure may not be apparent for several years, and delayed litigation results. Records of exposure monitoring, employee training programs, and medical examinations are maintained.

Medical Surveillance

PURPOSE

OSHA regulations require medical examinations for certain types of work involving exposure to hazardous or toxic substances.

GENERAL REQUIREMENTS

- All required medical examinations and procedures will be performed by or under the supervision of a licensed physician and will be provided without cost to the employee.
- The examination will include the personal history of employee and family, and occupational background including genetic and environmental factors.
- The Environment, Health and Safety Office will maintain a record of each employee subject to medical surveillance. This record will include:
 - A copy of the physician's written opinion as to the employee's suitability for employment in specific exposure conditions, or the employee's refusal to take the medical examination.
 - Any medical complaint by the employee related to exposure to a hazard or toxic substance.
 - A copy of the required information pertaining to employee exposure which Curaleaf must provide to the physician.
 - A copy of the employee's work history.
 - Curaleaf will maintain this record for the duration of employment plus 30 years, as required by the applicable OSHA standard.

STANDARDS REQUIRING MEDICAL SURVEILLANCE

29 CFR 1910.95 Occupational Noise Exposure

Annual audiometric tests will be required for employees exposed to an 8 hour time weighted average of 85 dBA or more.

29 CFR 1910.134 Respiratory Protection

Employees who are required to wear a respirator will be provided pre-assignment and periodic (e.g. annual) reviews by a physician to determine if the employee is physically able to wear a respirator.

29 CFR 1910.411 Commercial diving operations

Employees are not allowed to dive during any temporary physical impairment or condition which is likely to adversely affect the safety or health of the employee.

29 CFR 1910.120 Hazardous Waste Operations and Emergency Response

Pre-assignment and annual medical exams will be provided to members of hazmat teams. Medical exams also will be provided to

employees who work in hazardous waste facilities and are exposed over the Permissible Exposure Limit (PEL) of an OSHA regulated substance, wear respirators, are exposed to a hazardous chemical during a spill or release, or experience signs or symptoms of exposure.

29 CFR 1910.1001 Asbestos

Pre-assignment, annual, and termination medical examinations will be provided to employees who are exposed at or above the PEL for asbestos.

29 CFR 1910.1025 Lead

Medical surveillance will be provided for employees who are exposed to lead at the action level for more than 30 days per year. Medical surveillance includes pre-assignment and annual medical examinations and analysis of blood lead levels. Medical exams also will be provided for employees who experience signs and symptoms associated with lead intoxication.

29 CFR 1910.1030 Bloodborne Pathogens

Hepatitis B virus vaccinations will be offered to all employees who are occupationally exposed to human blood or other potentially infectious materials (OPIM). Medical evaluation and follow-up are required for occupational exposures to blood or OPIM.

29 CFR 1910.1048 Formaldehyde

Medical surveillance will be provided to employees who are exposed to formaldehyde at or above the action level. Medical surveillance consists of an evaluation of a medical disease questionnaire. Medical examinations will be provided to employees who the physician feels require further evaluation based on the medical disease questionnaire; who are required to wear respirators; who experience signs or symptoms of exposure to formaldehyde; or who are exposed in emergencies.

29 CFR 1910.1450 Laboratory Standard

Medical consultations and medical examinations will be provided when an employee develops signs or symptoms associated with a chemical to which the employee may have been exposed in the laboratory; when exposure monitoring reveals an exposure is routinely above the action level or PEL of an OSHA regulated substance; or whenever there is a likelihood that an employee was exposed as a result of an accidental spill or release.

49 CFR 391.41 Commercial Driver's License

A medical history and physical examination will be provided employees who are required to have a commercial driver's license. The purpose of the history and exam is to detect the presence of physical, mental or organic defects that affect the applicant's ability to operate a motor vehicle.

Hearing Conservation Program

PURPOSE

The purpose of the Hearing Conservation Program is to provide for the protection of Curaleaf employees from long-term hearing loss associated with noise levels in the workplace in compliance with OSHA 29 CFR Part 1910.95 Occupational Noise Exposure.

HEARING CONSERVATION PROGRAM

All Curaleaf employees whose noise exposures equal or exceeds an 8-hour time weighted average (TWA) of 85 decibels are enrolled in a hearing conservation program. The hearing conservation program includes:

- annual monitoring of noise exposures
- annual training on noise exposures
- use of hearing protectors
- annual audiometric testing

RECOGNITION AND EVALUATION OF NOISE SOURCES

When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, the department is to notify the Environment, Health and Safety Office to implement a monitoring program. The noise survey is performed using a sound level meter (A-scale, slow response) and/or noise dosimeter for evaluation of personal exposures. The employee is to be notified when he/she is exposed at or above an 8-hour time-weighted average of 85 decibels. Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that additional employees may be exposed at or above the action level; or the attenuation provided by hearing protectors being used by employees is not adequate.

AUDIOMETRIC TESTING

Annual audiometric testing is performed by a licensed or certified audiologist at the Hearing and Communication Center. A baseline audiogram is obtained within 6 months of an employee's first exposure at or above the action level. The baseline audiogram is established to compare against subsequent audiograms. The results of problem

audiometric tests are sent to the Occupational Health Clinic for review and to determine whether there is need for further evaluation.

Audiometric tests are to be pure tone, air conduction, hearing threshold examinations, with test frequencies including as a minimum 500, 1000, 2000, 3000, 4000, and 6000 Hz. Tests at each frequency are to be taken separately for each ear.

Employees are to be notified, in writing, of the results of exams. If the annual audiogram shows a standard threshold shift, employees are to schedule a retest within 30 days to verify the shift. When there is a verified standard threshold shift, the employee must be notified within 21 days after verification.

CONTROL OF NOISE SOURCE

When employees are subjected to sound levels exceeding 85 dBA TWA, feasible administrative or engineering controls are to be utilized. Types of administrative controls are rotation of employees, limiting time of certain operations, or restricting areas or work operations. Engineering controls include maintenance, modifying equipment, substitution of equipment, isolation, and acoustic material.

HEARING PROTECTION DEVICES

If feasible engineering or administrative controls cannot be accomplished personal hearing protective devices must be provided and used to reduce sound levels in areas above 85 dBA. The hearing protection used will depend on the operation, employee preference and attenuation required. The industrial hygienist is to assist in supplying information on attenuation data and supervise the correct use of hearing protectors. Employees are given the opportunity to select their hearing protectors from a variety of suitable hearing protectors. Personal protective devices should also be used during non-routine, infrequent operations, which do not warrant special engineering control.

Curaleaf strongly encourages the use of hearing protection devices while working around noisy equipment. The use of hearing protection devices is required for the following:

- When the exposure is 90 dBA, or greater.
- When the exposure is 85 dBA, or greater, and the employee has experienced a threshold shift.
- When the exposure is 85 dBA, or greater, and the employee has not yet had a baseline audiogram established.

For employees who have experienced a standard threshold shift, hearing protectors must attenuate employee exposure to an 8-hour

time-weighted average of 85 decibels or below. The adequacy of hearing protector attenuation shall be re-evaluated whenever employee noise exposures increase to the extent that the hearing protectors provided may no longer provide adequate attenuation.

SIGNS

Signs are to be posted in areas where noise levels are above 85 dBA stating that hearing protection is required. It is to read: "Caution: Hearing Protection Required".

TRAINING

An annual training program is provided for each employee included in the hearing conservation program. The training program includes effects of noise on hearing; the purpose of hearing protectors, and instruction on their selection, fitting, use, and care; and the purpose of audiometric testing.

RECORDKEEPING

Employee exposure measurements and assessments are maintained at the Environment, Health and Safety Office. Employee audiometric test records are kept at the Hearing and Communication Center. Audiometric test records shall be retained for the duration of the affected employee's employment. Employees can request access to their exposure information and audiometric test records.

Use of Chemical Carcinogens

CONTROL PRACTICES

Planning and implementation of control practices for the prevention of occupationally acquired cancer and for the protection of the general environment is to be included in all research programs involving known or suspected chemical carcinogens.

DEFINITION

Chemical carcinogens are chemicals which have been demonstrated to cause tumors in mammalian species by induction of a tumor type not usually observed, by induction of an increased incidence of a tumor type normally seen, by the appearance of such tumors at an earlier time than would be otherwise expected, or by promotion of tumors initiated from exposure to other chemicals.

APPLICABILITY

These policies apply to known or suspected chemical carcinogens. The OSHA Laboratory Standard 29 CFR 1910.1450 defines select carcinogens as those chemicals which are: regulated by OSHA as carcinogens; listed by the National Toxicology Program (NTP) as "known to be carcinogens"; listed by the International Agency for Research on Cancer Monographs (IARC) in Group 1 (carcinogenic to humans); listed by NTP as reasonably anticipated to be carcinogens or by IARC in Group 2A (probably carcinogenic to humans); and listed by IARC in Group 2B (possibly carcinogenic to humans) and causing statistically significant tumor incidence in experimental animals. The Environment, Health and Safety Office (962-5507) is to be consulted when questions arise about the carcinogenic potential of certain chemicals handled in laboratories.

LABORATORY SAFETY PLAN

The Laboratory Safety Plan describes procedures that will be used to ensure the safe handling of chemical carcinogens, an assessment of potential risks, the need for medical surveillance, procedures for handling accidental spills, and waste disposal methods.

ACCIDENTAL EXPOSURES

All overt accidental exposures of personnel to chemical carcinogens, such as exposure to a concentrated contaminated aerosol through research procedures, accidental spills, or accidental inoculation with a contaminated needle, are to be reported to EHS.

Chemical Waste Disposal

As a generator of hazardous waste, Curaleaf is required to comply with federal standards promulgated by the Environmental Protection Agency (EPA) and the Department of Transportation (DOT). These regulations require documentation of the transfer of hazardous waste from the point of generation to final disposal. Each waste generator is responsible for correctly identifying the hazardous waste generated in his/her work area, thereby ensuring proper transportation and disposal.

Waste containers must be:

- Labeled with the words "Hazardous Waste" or other clear chemical identification

- Securely closed except when material is being added or removed
- Placed in secondary containment if the container is a liquid, and in quantities of 4 liters or less, or if the container is made of glass and is stored on the floor.
- Conform with specifications for a satellite accumulation area.

WASTE MINIMIZATION

The most significant way that Curaleaf employees can assist in the management of hazardous waste is to reduce the volume of waste generated. Support services are encouraged to explore the use of nonhazardous cleaners, paints and solvents.

EPA DEFINITIONS OF HAZARDOUS WASTE

Current EPA regulations apply to wastes having the following characteristics:

- Ignitability: liquids with a flash point of less than 60°C (140°F); oxidizers; flammable gases; and solids capable of burning vigorously and persistently after ignition through friction, absorption of moisture, or spontaneous chemical changes at standard temperature and pressure.
- Corrosivity: aqueous solutions with a pH less than or equal to 2 or greater than or equal to 12.5; liquids which corrode steel at a rate greater than 6.35 mm per year at 55°C.
- Reactivity: chemicals normally unstable that undergo violent change, react violently with water, form potentially explosive mixtures with water, emit toxic vapors when mixed with water, capable of detonation or explosive reaction.
- Toxicity: 43 specified heavy metals, solvents and pesticides.
- Listed wastes: discarded commercial chemical products or off-spec commercial chemical products. The EPA specifically names over 600 chemicals which are hazardous due to toxicity, reactivity and/or ignitability.

ADDITIONAL WASTES

EPA hazardous waste regulations do not address many materials used in various operations that may pose a threat to health when not managed properly. These include mutagens, carcinogens, teratogens, oils, refrigerants, herbicides, pesticides, cleaners, and controlled substances. By-products associated with nanotechnology are also deemed to be hazardous waste, and managed by the Environment, Health and Safety Office.

OSHA Laboratory Standard

LEGAL REQUIREMENTS

OSHA 1910.1450, "Occupational Exposures to Hazardous Chemicals in Laboratories" (henceforth referred to as the Laboratory Standard) dictates that employers limit employees' exposure to hazardous chemicals to below the permissible exposure limit (PEL) (or action level, if applicable) for a specific chemical. This Laboratory Standard requires that employees be apprised of the hazards of chemicals present in their work area through information and training. It also requires that a written "Chemical Hygiene Plan" be developed, implemented, and made available to employees. The Laboratory Standard applies only to laboratories, and, in general, supersedes other OSHA health standards.

RESPONSIBILITIES

The Environment, Health and Safety Office is responsible for development and implementation of the Chemical Hygiene Plan and will assist Laboratory Supervisors in developing their Laboratory Safety Plans, and obtaining chemical hazard information including material safety data sheets (MSDSs). The Environment, Health and Safety Office provides training for employees on the Laboratory Standard and on general chemical safety. In addition, the Environment, Health and Safety Office is available to offer advice on chemical hazards in the laboratory and will monitor employee exposures upon request.

The Principal Investigator or laboratory supervisor is responsible for developing and implementing a Laboratory Safety Plan for his/her laboratory, providing training and information on chemical hazards, and enforcing safety procedures in the laboratory.

CHEMICAL HYGIENE PLAN

The Chemical Hygiene Plan is a written program developed and implemented by the employer which sets forth procedures, equipment, personal protective equipment and work practices that are capable of protecting employees from the health hazards presented by hazardous chemicals used in that particular workplace.

LABORATORY SAFETY PLAN

The laboratory safety plan is given to all employees to communicate the Laboratory Supervisors' expectations of safety in the laboratory.

The safety plan also serves as written documentation of how hazardous materials are handled. The laboratory safety plan is to be reviewed and updated annually. The following areas should be addressed in the safety plan:

- Laboratory Personnel: names of personnel working in the laboratory;
- Employee Information and Training: documentation of employee training programs, including the content of training sessions, location of material safety data sheets, and signs and symptoms of exposures to the agents with the most highly acute toxicity;
- Laboratory Safety Rules and Procedures: identification of special safety rules and procedures not described in the Laboratory Safety Manual including precautions and identification of designated areas for handling chemical carcinogens, reproductive toxins, or chemicals with a high degree of acute toxicity;
- Waste Disposal: identification of the hazardous waste streams generated and instructions for the disposal of various types of hazardous waste;
- Emergency Procedures: spill control procedures including prevention, containment, cleanup, evacuation, and procedures for emergencies occurring outside the laboratory, such as fires. A floor plan of the laboratory showing location of hazardous materials and safety equipment should be included;
- Personal Protective Equipment (PPE): identify the unique PPE required for laboratory procedures

EMPLOYEE INFORMATION TRAINING

Employees shall be apprised of the hazards and of chemicals present at the time of initial assignment and whenever a new hazard is introduced in the laboratory. A training session covering the items listed below and appropriate documentation is required for all laboratory personnel.

- The contents of the Laboratory Standard and Chemical Hygiene Plans
- The location of the Laboratory Safety Plan for the laboratory, chemical references, and Material Safety Data Sheets covering the safe handling, storage, and disposal of chemicals used in the laboratory
- Current recommended threshold limit values (TLVs) and the OSHA regulated permissible exposure limits (PELs) (available from the MSDS for a chemical)

- The physical and health hazards, including signs and symptoms of overexposure, of the chemicals used in the laboratory
- Measures employees can take to protect themselves from hazardous chemicals in the laboratory
- How to detect a release and/or leak of hazardous chemicals in the lab

A general laboratory orientation training program for new laboratory employees, covering the Laboratory Standard and other environment, health and safety procedures for campus laboratories is available to all employees.

EMPLOYEE EXPOSURE DETERMINATION

For laboratory uses of OSHA regulated substances, employees' exposures must not exceed permissible exposure limits for such substances as specified in 29 CFR part 1910, subpart Z. If employees believe that exposure levels to a regulated substance routinely exceed PELs (or action level, if applicable) they should contact the Environment, Health and Safety Office to measure exposure levels.

LABORATORY HOODS

Laboratory hoods are used for operations that may result in release of toxic chemical vapors, fumes or dust. Chemical fume hoods are inspected and certified by the Environment, Health and Safety Office annually. An average face velocity of 90 to 150 feet per minute is required for all laboratory hoods. A continuous monitoring device that includes an audible alarm is required for all new fume hoods and is recommended for all existing hoods.

PARTICULARLY HAZARDOUS SUBSTANCES

Additional precautions detailed in the Curaleaf Chemical Hygiene Plan must be taken to protect employees when particularly hazardous substances, such as chemical carcinogens, reproductive toxins or highly toxic materials, are handled in the laboratory. These additional precautions are also to be considered when handling chemicals with a high degree of acute toxicity or reproductive toxins.

Chemical carcinogens are defined as chemicals that are:

- regulated by OSHA as carcinogens
- listed by the National Toxicology Program (NTP) as "known to be carcinogens"
- listed by the International Agency for Research on Cancer Monographs (IARC) in Group 1 (carcinogenic to humans)

- Listed by NTP as reasonably anticipated to be carcinogens or by IARC in Group 2A (probably carcinogenic to humans) or in Group 2B (possibly carcinogenic to humans) and causing statistically significant tumor incidence in experimental animals

MEDICAL SURVEILLANCE

Employees who work with hazardous chemicals are provided an opportunity for medical consultation and/or medical examinations under the following circumstances:

- whenever an employee develops signs or symptoms associated with a hazardous chemical to which the employee may have been exposed in the laboratory
- where exposure monitoring reveals an exposure level routinely above the PEL (or action level, if applicable) for an OSHA regulated substance, as prescribed by the regulations for that particular substance
- whenever there is likelihood that an employee was exposed to a hazardous chemical as a result of a spill, leak, explosion, or other release.

Use of Biohazardous Agents

CONTROL PRACTICES

Planning and implementation of control practices for the prevention of laboratory-acquired infections and for the protection of the general environment are to be included in all research programs involving biohazardous agents.

DEFINITIONS

Biohazardous agents are infectious microorganisms, or their toxins, which cause or may cause human disease.

APPLICABILITY

These requirements apply to microorganisms and viruses listed by the CDC/NIH Biosafety in Microbiological and Biomedical Laboratories Manual..

BIOSAFETY LEVEL 3 and 4

There are no facilities appropriate for working with Biosafety

Level 3 or 4 pathogens so work involving these agents is prohibited.

LABORATORY SUPERVISORS

Each laboratory supervisor/department manager is responsible for ensuring that personnel are trained in safe practices; reporting exposures and potential exposures to these biohazardous agents to the Environment, Health and Safety Office; and submitting a Laboratory Safety Plan for work under his/her direction to the Environment, Health and Safety Office.

LABORATORY SAFETY PLAN

Procedures describing the use of biohazardous agents are to be included in the Laboratory Safety Plan. The Laboratory Safety Plan is to describe the procedures that will be used to insure the safe handling of biohazardous agents, an assessment of the potential risks, the need for medical surveillance, and procedures for handling accidental spills and waste disposal methods.

ACCIDENTAL EXPOSURES

All overt accidental exposures of personnel to biohazardous agents, such as exposure to a concentrated contaminated aerosol from research procedures, accidental spills, or accidental inoculation with a contaminated needle, should be reported to the University Employee Occupational Health Clinic (966-9119) and to the Environment, Health and Safety Office.

Eye and Face Protection

General

Eye and face protection are required for all operations involving the following: Hot solids, liquids, or molten metals; or

- Milling, sawing, turning, shaping, cutting, or stamping of any solid materials; or
- Heat treatment, tempering, or kiln firing of any metal or other materials; or
- Gas or electric arc welding; or
- Repair or servicing of any vehicle; or

- Caustic or explosive chemicals or materials.

Required for Visitors

Visitors to facilities and laboratories shall be furnished with and required to wear eye safety devices while such programs are in progress.

RULES FOR WEARING EYE PROTECTION

- Eye protective devices must be worn in all laboratories at all times.
- Goggles, or safety glasses plus face shield, must be worn in all laboratories when work involving splash hazard is in progress (when hot liquids, or flammable, corrosive or caustic chemicals are being used).
- Where there is an explosive (or implosive) hazard, eye and face protective devices must be worn.
- The above rules apply equally to employees, contractors, and visitors.
-

Rules for Facilities

Eye protective devices must be worn when hazardous operations, including operation of power tools, pouring of molten metal, welding, soldering, etc., are in progress. The wearing of safety glasses in shops at all times is encouraged. This rule applies to employees, contractors, and visitors.

Rules for maintenance & Construction

Eye protective devices must be worn by all employees operating power tools and during hammering, chipping, and cutting operations. Eye protection is also required for other persons exposed within the area of these operations.

Equipment standards

All eye and face protective devices, which include spectacles, goggles, and face shields, shall comply with American National Standards Institute (ANSI) F87.1-1979 and later revisions thereof.

Selection of appropriate devices based on hazard

The type of device required would depend on the nature of the

operation:

Side shields

Safety glasses with side shields, or goggles, are required if flying particles are likely to enter at an angle, and are usually required where two or more people are working in close proximity. Safety glasses with permanently attached side shields, or dust goggles, will provide this protection. Clip-on side shields do not meet ANSI standards.

Splash goggles

Safety splash goggles are required to provide protection against corrosive or hot liquids or fine particles capable of penetrating the ventilation holes in dust goggles, (See recommended Laboratory Rules covered in this statement for additional information.)

Selection based on frequency of use - dust goggles.

Dust goggles are the least expensive approved eye protection devices available, fit most head sizes and facial shapes, and may be worn over ordinary glasses. They are recommended for visitors, employees, and students who require eye protection periodically for short durations (less than two hours per day).

Safety glasses

Safety glasses are generally more comfortable than goggles and are therefore recommended for employees who require eye protection frequently and/or for long durations (more than two hours per day).

Face shields

Face shields do not meet eye protection standards and are only for face protection. Appropriate eye protection devices must be worn under the face shield.

EYE CONTAMINATION

Eye wash facilities

Every laboratory or work place using caustic and/or corrosive chemicals shall be equipped with emergency eye wash facilities.

First aid - chemical burns

When the eye has received chemical irritation, flood the eye with water immediately for at least 15 minutes and then seek medical treatment. Neutralizers or other medication should be used only on the advice, or under the direction, of a physician.

EMPLOYEES

Employees are expected to wear footwear appropriate for the duties of their employment. Sandals or other open-toe style shoes are not permitted in laboratory, cultivation, production, storage, maintenance or shipping areas or other job locations where glass, caustic or corrosive chemicals, or hot materials are used or handled.

SAFETY SHOES

Safety shoes are used to protect the feet against injuries from heavy falling objects, against crushing by rolling objects, or against lacerations from sharp edges, and against electrical hazards.

WHEN REQUIRED

Safety shoes are required for employees whose routine job duties require the lifting, carrying, or moving, etc., of objects weighing more than fifteen pounds, which, if dropped, would likely result in foot or toe injury.

NEW EMPLOYEES

Employees whose job duties require safety shoes will be required to obtain safety shoes before starting employment.

ENFORCEMENT

Once a job has been designated as requiring safety shoes, employees will not be allowed to work without the required foot protection.

STANDARDS

Safety footwear shall comply with ANSI Z41.1-1991 "American National Standard for Personal Protection-Protective Footwear".

Compliance With Laboratory Safety Standards

COMPLIANCE ISSUES

The health and safety of workers and building occupants is the

most important factor to consider in laboratory work. In addition to these health and safety concerns, compliance with OSHA, Radiation Protection, and EPA regulations is also important because of the severe financial consequences, especially related to EPA hazardous waste regulations.

SAFETY STANDARDS

Sources of environment, health and safety standards and key compliance issues include:

Standard	Key Compliance Issues
OSHA Laboratory Standard	Laboratory Safety Plan, training of staff, MSDSs, emergency plan, secure compressed gas cylinders, outdated peroxide-formers
EPA/State Hazardous Waste regulations	Lids, labels, mixing incompatibles, secondary containment, location
Radiation Protection regulations	Radiation source control, dose limits, waste, training, personnel monitoring, labeling, and hazard information signs
Fire/Life Safety Codes	10-gallon open storage flammables limit, clear laboratory egress, hallway storage
Biological Safety, Security and rDNA	Biological agents and toxins use practices, containment, facilities, management and security
Curaleaf policies	Training, prevention of injuries, personnel policies, grant proposal review
Consensus standards of good laboratory practice	Hazardous material inventory minimization and storage compatibility, housekeeping, appropriate attire, food & drink within designated area

SAFETY VIOLATION CLASSIFICATIONS

Curaleaf uses the following categories of violations:

Imminent danger

A process, action, or condition where there is reasonable

certainty a hazard exists can be expected to cause serious physical harm.

Serious violation

A process, action, or condition that will probably lead to physical harm or will result in significant exposure to biological or physical agents or violates regulatory standards (e.g. hazardous waste container management).

Non-serious violation

A process, action or condition that has a direct relationship to health and safety but probably would not cause serious physical harm or significant exposure to biological or physical agents. Related non-serious violations may result in a serious violation where in combination they present a substantial probability of exposure, injury or physical harm.

Documentation

Required EHS documentation has not been completed, updated, submitted, and/or retained.

ENFORCEMENT POLICIES

Imminent danger

Environment, Health & Safety notifies personnel in the area to immediately cease operations and close the laboratory and informs Senior Management of the action. All work together to abate the problem. EHS will perform follow-up inspections to ensure compliance.

Serious violation

Environment, Health & Safety notifies lab personnel and Laboratory Supervisor of the violation and sets a deadline for abatement, and may recommend that the PI shut down the operation until abated. Follow-up notification, in writing, goes to the laboratory Supervisor. EHS will perform follow-up inspections to ensure compliance if appropriate.

Non-serious violation

Environment, Health & Safety notifies laboratory personnel of the violation and requests abatement as soon as practicable. EHS

sends follow-up notification in writing to the PI.

Documentation violations

Environment, Health & Safety notifies laboratory personnel of the violation and requests abatement as soon as practicable. EHS sends follow-up notification in writing to the Laboratory Supervisor.

REPORTS TO DEPARTMENT HEADS AND LABORATORY SAFETY COMMITTEE

EHS will send annual reports to the department head summarizing inspection activities within his or her department. The reports will list the non-serious, serious, imminent danger, and documentation violations and render a general assessment of Outstanding, Good, Fair, or Unacceptable. EHS will also report these findings at meetings of the Safety Committee(s), as appropriate.

Respiratory Protection Program

INTRODUCTION

The purpose of the Curaleaf Respiratory Protection Program is to protect the health of employees in accordance with the Occupational Safety and Health Administration's (OSHA) Respiratory Protection Standard, 29 CFR 1910.134. Respirators shall be used to protect against harmful dusts, fibers, fumes, mists, gasses, smokes, sprays, bio-aerosols, and vapors.

When possible, occupational exposures caused by breathing contaminated air must be controlled through the use of feasible engineering controls such as the use of general and local ventilation systems, confinement of the operation, or substitution of less toxic materials. When effective engineering controls and other types of workplace controls (administrative, product substitution, etc.) are not feasible, or while they are being instituted, appropriate respirators shall be provided and used. The use of respirators is the last line of defense to protect employees from inhalation hazards.

This program will be updated as necessary to reflect changes in

workplace conditions that affect respirator use.

RESPONSIBILITIES

Department of Environment, Health and Safety

The Department of Environment, Health and Safety is responsible for administering and overseeing the respiratory protection program and for conducting evaluations of program effectiveness.

Supervisor

Supervisors are to develop and implement written site-specific procedures outlining the nature of the work, the hazard to which employees are exposed, and safety procedures to be followed. The specific duties requiring the use of respirators are to be described along with identifying the type of respirators to be worn (see Worksite Specific Procedures).

- development and communication of worksite specific safety procedures (Job Safety Analysis)
- ensuring that the employees receive respirator training, fit-testing, and medical evaluations prior to issuing respirators for use.
- implementation and enforcement of all provisions of this program.

Employee

Employees who are identified as needing respiratory protection are required to comply with Departmental and Work Unit specific policies on respirator use:

- Male Employees (males) ensure they are clean shaven prior to annual fit-testing and anytime they must use and don a respirator. This will reduce the potential for leakage of the respirator as a result of an ineffective face to respirator seal.
- Reporting any problems associated with respiratory protective equipment to their supervisors and notifying the Occupational Health Clinic of any changes in medical condition or work practice that could impact their medical clearance for respirator use.

WORKSITE-SPECIFIC PROCEDURES

Each department, shop, or work unit requiring the use of respirators is to have work-site specific procedures described in their plan outlining the nature of the work, the hazard to which employees are exposed, and safety procedures to be followed.

The best way to create worksite-specific procedures is by developing a "Job Safety Analysis (JSA)". It describes a task in a step-by-step fashion, identifies associated hazards, and outlines proper controls that minimize the risk of injury or illness to the individual performing that task. Procedures for respirator use, care, cleaning, chemical cartridge change out schedules, maintenance, and inspection are to be included in the JSA. Employees must be trained on the JSA and the Work Unit's Hazards Management Plan. Employees must be cleared for respirator use prior to working in an area or assigned to a task that requires respiratory protection.

SELECTION OF RESPIRATORS

Respirators are selected by the applicable work unit with the guidance from the EHS Department while considering many factors including the nature of the hazard, the concentration of the contaminant to which an employee is exposed, extent of the hazard, regulatory requirements, work requirements and conditions, and the characteristics and limitations of available respirators.

Respirators for Immediately Dangerous to Life and Health (IDLH) Atmospheres

All oxygen-deficient atmospheres, less than 19.5% oxygen, are considered IDLH. The following respirators are to be used in IDLH atmospheres:

- A Self Contained Breathing Apparatus (SCBA) used in the pressure-demand mode, certified by NIOSH for a minimum service life of thirty minutes, or
- A combination full facepiece pressure demand supplied-air respirator (SAR) with auxiliary self-contained air supply.
- Respirators provided only for escape from IDLH atmospheres are to be NIOSH-certified for escape from the atmosphere in

which they will be used.

All employees who will be required to use an SCBA must be trained, tested, and certified prior to use.

MEDICAL EVALUATIONS

Using a respirator may place a physiological burden on employees, which varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical status of the employee. Each employee assigned a respirator in carrying out his/her job responsibilities is to receive a medical evaluation to determine his/her ability to use a respirator, before being fit tested or required to use the respirator in the workplace.

Medical evaluation procedures: Employees are to complete the medical questionnaire at the time of their medical examination at the Occupational Health Clinic. The medical staff will perform a medical evaluation of the ability of the employee to wear a respirator, conduct fit-testing, and determine the need for additional medical evaluations or restrictions on the use of respiratory protection devices. The medical questionnaire and examinations are administered confidentially during the employee's normal working hours or at a time and place convenient to the employee. Employees are encouraged to discuss the questionnaire and examination results with a member of the UEOHC medical staff.

The following information must be provided to the clinic before a recommendation is made concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort;
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.

Medical determination: The Occupational Health Clinic will

provide the employee and the employee's supervisor with a written recommendation regarding the employee's ability to use a respirator. The recommendation is to include the following information:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the occupational health clinic has provided the employee with a copy of the written recommendation.

Additional medical evaluations are provided if:

- An employee reports medical signs or symptoms that are related to the ability to use a respirator;
- The Occupational Health Clinic, supervisor, or the Department of Environment, Health and Safety determines that an employee needs to be reevaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature, etc.) that may result in a substantial increase in the physiological burden placed on an employee.

FIT TESTING PROCEDURES

- Employees using negative or positive pressure tight-fitting face piece respirators receive a quantitative fit test with the respirator that they will be using, to ensure an effective mask-to-face seal.
- Employees are fit tested prior to initial use of the respirator, or whenever a different respirator face piece (size, style,

- model or make) is used, and at least annually thereafter
- Employees are trained with the respirator they will be using prior to the fit-test. The employee must properly don his/her respirator before the fit-test without assistance in order to achieve an effective mask-to-face seal and to pass the fit-test with an acceptable fit-factor.
- An additional fit test is conducted whenever the employee, supervisor, the Department of Environment, Health and Safety, or the Occupational Health Clinic make visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.
- The employee may select a different respirator if he/she does not think the respirator fit is acceptable, even after passing the fit test. The employee will have to be re-fit tested if a different type, model, or manufacture of respirator is used.

PROPER USE OF RESPIRATORS

Face piece Seal Protection. Respirators will be used in accordance with specific procedures described in the manual provided by the respirator manufacturer. Respirators with tight-fitting face pieces are worn in a manner that does not interfere with the face piece seal. Employees with facial hair, or any other condition, that interferes with the sealing surface of the face piece and the face, or with valve function, are not permitted to wear tight fitting face pieces. Corrective glasses or goggles or other personal protective equipment is to be worn in a manner that does not interfere with the seal of the face piece to the face of the user.

User Seal Check Procedures. For all tight-fitting respirators, employees are to perform a user seal check each time that the respirator is put on, before entering an area containing hazardous atmospheres, and periodically while wearing the respirator in the contaminated area. Both the positive and negative pressure checks listed below and/or the respirator

manufacturer's additional recommended user seal check method is to be used.

Positive Pressure Check. Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

Negative Pressure Check. Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. Although the respirators currently used by the University can be checked using the palm method, the design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

Manufacturer's Recommended User Seal Check

Procedures. The respirator manufacturer's recommended procedures for performing a user seal check may be used instead of the positive and/or negative pressure check procedures provided that the employer demonstrates that the manufacturer's procedures are equally effective.

Use of Powered-Air-Purifying Respirator (PAPR): The use of a powered-air purifying respirator uses a blower to force air through the air-purifying element. The advantage of using a PAPR is that it usually supplies air at a positive pressure, reducing inward leakage of contaminants when compared with non-powered air purifying respirators.

Employees must ensure that the motor blower of the PAPR is providing the required airflow prior to operation or anytime a decrease in airflow is experienced to verify that the PAPR is

providing the required airflow. To be certified as a PAPR by NIOSH, the blower must provide at least 170 Liters/Minute (6 cubic feet per minute (cfm)) to a loose-fitting face piece, helmet, or hood or 115 Liters/Minute (4 cfm) to a tight-fitting facepiece. To check the airflow prior to operation, the respirator manufacturer provides a device for verifying that the airflow exceeds these levels. The device includes a flow meter that can be attached to the respirator. Employees must read and understand the manufacturer instructions prior to use of the PAPR. Maintenance and airflow indicator tests should be included in your standard operating procedure and/or Job Safety Analysis for the operation of the PAPR for use for protection against air contaminants.

Continuing Respirator Effectiveness. Supervisors are to maintain surveillance of the work area conditions and the degree of employee exposure or stress. When there is a change in work area conditions or degree of employee exposure or stress that may affect respirator effectiveness, the supervisor is to reevaluate the continued effectiveness of the respirator. The supervisor is to ensure that employees leave the respirator use area:

- To wash their faces and respirator face pieces as necessary to prevent eye or skin irritation associated with respirator use; or if they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece; or
- To replace the respirator or the filter, cartridge, or canister elements. If the employee detects vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece, the respirator is to be replaced or repaired before the employee is allowed to return to the work area.

MAINTENANCE AND CARE OF RESPIRATORS

Cleaning and Disinfecting. Employees are provided with respirators that are clean, sanitary, and in good working order. Respirators are cleaned and disinfected using the following procedures, or equivalent procedures recommended by the respirator manufacturer.

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm (43°C [110°F] maximum) water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt. Rinse components thoroughly in clean, warm (43°C [110°F] maximum) running water. Drain.
- If the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in one of the following:
 - Hypochlorite solution (50 parts per million (ppm) of chlorine) made by adding approximately one milliliter of laundry bleach to one liter of water at 43°C (110°F); or,
 - Aqueous solution of iodine (50 ppm iodine) made by adding approximately 0.8 milliliters of tincture of iodine (6-8 grams ammonium and/or potassium iodide/100 cc of 45% alcohol) to one liter of water at 43°C (110°F) or
 - Other commercially available cleansers of equivalent disinfectant quality when used as directed, if their use is recommended or approved by the respirator manufacturer.
- Rinse components thoroughly in clean, warm (43°C [110°F] maximum) running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- Components are hand-dried with a clean lint-free cloth or air-dried.
- Reassemble face piece, replacing filters, cartridges, and canisters where necessary.
- Test the respirator to ensure that all components work properly.

The respirators are to be cleaned and disinfected at the following

intervals:

- Respirators issued for the exclusive use of an employee are to be cleaned and disinfected as often as necessary to be maintained in a sanitary condition;
- Respirators issued to more than one employee are to be cleaned and disinfected before and after being worn by different individuals;
- Respirators maintained for emergency use are to be cleaned and disinfected after each use; and

Storage. All respirators are to be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals. They are to be packed or stored to prevent deformation of the face piece and exhalation valve. Emergency respirators are to be: Kept accessible to the work area; stored in compartments or in covers that are clearly marked as containing emergency respirators; and stored in accordance with any applicable manufacturer instructions.

Inspection. All respirators used in routine situations are to be inspected before each use and during cleaning. Respirator inspections are to include the following:

- A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to; the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters;
- A check of elastomeric parts for pliability and signs of deterioration.
- Employees that use Powered Air Purifying Respirators must verify that the respirator and components (e.g. blower motor, attachment hoses, hood or helmet) are inspected prior to use.
- All respirators maintained for use in emergency situations are to be inspected at least monthly in accordance with the manufacturer's

recommendations, and are to be checked for proper function before and after each use.

- Emergency escape-only respirators are to be inspected before being carried into the workplace for use.
- Self-contained breathing apparatus (SCBA) are to be inspected monthly. Air and oxygen cylinders are to be maintained in a fully charged state and are to be recharged when the pressure falls to 90% of the manufacturer's recommended pressure level. The inspection is to include a determination that the regulator and warning devices function properly.
- Documentation of inspections for respirators maintained for emergency use is to be provided on a tag or label that is attached to the storage compartment for the respirator, is kept with the respirator, or is included in inspection reports stored as paper or electronic files. This information is to be maintained until replaced following a subsequent certification. The documentation is to include:
 - The date the inspection was performed;
 - The name (or signature) of the person who made the inspection;
 - The findings;
 - Required remedial action; and,
 - A serial number or other means of identifying the inspected respirator.

Repairs. Respirators that fail an inspection or are otherwise found to be defective are removed from service, and either be discarded, repaired, or adjusted. Repairs or adjustments to respirators are made only by persons appropriately trained and use only the manufacturer's NIOSH-approved parts designed for that particular respirator. Repairs are to be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed. Reducing and admission valves, regulators, and alarms are to be adjusted or repaired

only by the manufacturer or a technician trained by the manufacturer.

BREATHING AIR QUALITY AND USE FOR ATMOSPHERE-SUPPLYING RESPIRATORS

Compressed air, compressed oxygen, liquid air, and liquid oxygen used for respiration are to meet the United States Pharmacopoeia requirements for medical or breathing oxygen. Compressed breathing air is to meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:

- Oxygen content (v/v) of 19.5-23.5%;
- hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
- Carbon monoxide (CO) content of 10 ppm or less;
- Carbon dioxide content of 1,000 ppm or less; and
- Lack of noticeable odor.

Compressed oxygen is not to be used in atmosphere-supplying respirators that have previously used compressed air. Oxygen concentrations greater than 23.5% are to be used only in equipment designed for oxygen service or distribution. Cylinders used to supply breathing air to respirators are to meet the following requirements:

- Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
- Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
- The moisture content in the cylinder does not exceed a dew point of -50°F (-45.6°C) at 1 atmosphere pressure.

Compressors used to supply breathing air to respirators are constructed and situated so as to:

- Prevent entry of contaminated air into the air-supply

- system;
- Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56°C) below the ambient temperature;
 - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters are to be maintained and replaced or refurbished periodically following the manufacturer's instructions.
 - Have a tag containing the most recent change date and the signature of the person authorized by the employer to perform the change. The tag is to be maintained at the compressor.

For compressors that are not oil-lubricated, carbon monoxide levels in the breathing air are not to exceed 10 ppm. For oil-lubricated compressors, a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels are to be used. If only high-temperature alarms are used, the air supply is to be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm. Breathing air couplings are to be incompatible with outlets for non-respirable worksite air or other gas systems. No asphyxiating substances are to be introduced into breathing air lines. Only breathing gas containers marked in accordance with the NIOSH respirator certification standard, 42 CFR part 84 are to be used.

RESPIRATOR TRAINING

Employees are to be trained in the respiratory hazards to which they are potentially exposed during routine and emergency situations, and in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance. The training must be comprehensive, understandable, and be prior to requiring the employee to use a respirator in the workplace. Retraining is to be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; OR,
- Any other situation arises in which retraining appears necessary to ensure safe respirator use. Each employee is

to demonstrate knowledge of at least the following:

- Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
- What the limitations and capabilities of the respirator are;
- How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
- How to inspect, put on and remove, use, and check the seals of the respirator;
- What the procedures are for maintenance and storage of the respirator;
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators; and
- The general requirements of the OSHA Respiratory Protection Standard.

VOLUNTARY RESPIRATOR USE

Respirators may be provided at the request of employees, or employees may use their own respirators, if such respirator use will not in itself create a hazard. OSHA requires that the voluntary use of respirators be controlled as strictly as if their use were required. The following requirements are made for the voluntary use of respirators:

- Medical determination that the employee is able to use the respirator;
- The respirator is to be cleaned, stored, and maintained so that its use does not present a health hazard to the user; and,
- Employees are provided a copy of Appendix D of OSHA 1910.134, "Information for Employees Using Respirators When Not Required Under the Standard".

Exception: These requirements do not apply to the voluntary use of filtering face pieces (dust masks).

RECORDKEEPING

The Department of Environment, Health and Safety will maintain a written copy of the respirator program in the Environment,

Health and Safety Manual. The medical evaluations and fit-testing results will be maintained in the Occupational Health Clinic medical records in accordance with 29 CFR 1910.1020. This information will be made available upon request to regulatory agency inspectors or affected employees.

AIR PURIFYING RESPIRATOR CHEMICAL CARTRIDGE CHANGE OUT SCHEDULE

Each Work Unit that uses half face or full face air purifying respirators equipped with chemical cartridges for protection against airborne hazards such as gasses and vapors (e.g. solvent vapors) must implement a chemical cartridge change out schedule prior to the use of the respirator. EHS Department will assist in performing this task during scheduled workplace evaluations and inspections. EHS Staff will help implement a change schedule for Work Units that use chemical cartridges that is based on objective information or data that will ensure that canisters and cartridges are changed before the end of their service life.

The service life of a cartridge depends upon many factors, including;

- environmental conditions such as humidity,
- breathing rate of the respirator user,
- cartridge filtering capacity, and
- the amount of contaminants in the air.

Detection of chemicals by taste, smell, or irritation is not acceptable indication to replace respirator chemical cartridges. An established change out schedule will help prevent "break-through" of the chemical cartridge and will prevent detection of chemicals by taste, smell, or irritation as a result of the overuse of a saturated cartridge.

EHS Department Staff will assist you develop chemical cartridge change out schedules upon request and during scheduled workplace evaluations. The OSHA Respiratory Protection e-tool/Respirator Change Schedule can be used to help establish acceptable chemical cartridge change schedules.

Appendix A: Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard. You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Life Safety: Electrical Equipment

GENERAL

The University Environment, Health and Safety Office is responsible for inspecting buildings for compliance with the Fire Codes, Life Safety Codes, and the National Electrical Code.

APPLIANCES AND EQUIPMENT

Check appliances and equipment to make sure they are maintained in proper working order. Check electrical cords to make sure they are free from cracks and that the grounding prong is intact. If not, tag them as defective and remove them from service.

PORTABLE SPACE HEATERS

Electric space heaters are not permitted for use at Curaleaf.

Automated External Defibrillator Policy

Curaleaf and its EHS Department (EHS) are committed to the health and safety of its employees, contractors and visitors. An AED is used to urgently diagnose and treat ventricular fibrillation. An AED is attached to a victim's chest to assess the heart's rhythm. If appropriate, the device will recommend that a shock be delivered to resume a safe rhythm for the victim's heart. When delivered, a metered electrical charge restores the heart's functionality and often saves the victim's life.

AEDs are most successful when their first shock is delivered within 3-4 minutes of sudden cardiac arrest onset. Thus, it is important that AEDs are installed where they are most likely to be needed - and in highly visible, easily accessible locations - so that trained personnel can find and access them in a timely manner. Because of their ease of use and built-in safeguards, untrained bystanders have successfully used an AED, but they are intended for use by trained personnel [AED training offered by the American Red Cross and the American Heart Association includes recognition of cardiac arrest symptoms, cardiopulmonary resuscitation (CPR) and the proper use of an automated external defibrillator]. Because they are highly

effective, AEDs are becoming more widespread.

The goal of this Policy is to ensure that AEDs installed at Curaleaf are safely maintained and used, and to promote training and easy access to installed AEDs.

LIABILITY AND GOOD SAMARITAN LAWS

Connecticut law allows for the use of an AED during an emergency for the purpose of attempting to save the life of another person who is, or who appears to be, in cardiac arrest. Accordingly, Connecticut law also expressly provides immunity from civil liability for those who obtain and maintain AEDs, and those who use such devices to attempt to save a life.

Specifically:

- The person or entity that provides the cardiopulmonary resuscitation and AED training to a person using an AED.
- The person or entity responsible for the site where the AED is located when the unit has provided for a program of training.

AED OWNER RESPONSIBILITIES

Departments and other administrative units who acquire an AED (i.e., AED Owners) are responsible for maintaining the device to the standards of its manufacturer, the programmatic standards of the American Heart Association or the American Red Cross, and this Policy. AED owners must:

- Designate a person who is responsible for management of the AED (i.e., departmental responsible person).
- Ensure that inspections and maintenance is conducted in a timely manner and in accordance with written user and service manuals provided by the manufacturer.
- AED Owners are responsible for the purchase of batteries and other supplies.
- AED Owners are responsible for changing batteries, when indicated.
- Providing or arranging for training and refresher training in AED use for their staff, such that:
- Training is conducted in a timely manner and in accordance with written user and service manuals provided by the manufacturer.

- A sufficient number of staff are trained so that at least one trained staff person is on site during normal business hours.
- Training must be documented, and AED owners must send training records to EHS.
- Notify EHS of any AED installations.
- Allow easy access to the AED by students, faculty, staff and visitors who are in the vicinity.
- Maintain on-site records, inspections, training, and other supporting documentation.
- In the event of use, the AED goes with the patient to the hospital, data is downloaded by the physician oversight or their designee, and the device is returned to the site with consumable supplies replenished by the site.

REQUIRED ON-SITE RECORDS

The following records must be maintained on site:

- Guidelines for use.
- Manufacturer's instructions.
- Written self-inspection records.
- Training records, including a description of the training program.
- The identity of the department's responsible person.
- Identification of the designated physician who is responsible for oversight of the AED.
- Copy of the prescription form.
- Standard handbooks and templates for recordkeeping are available from manufacturers, the American Heart Association and the American Red Cross. Contact EHS for additional information and guidance.

EHS RESPONSIBILITIES

EHS will assist departments and responsible persons in managing AEDs on campus, and will implement and enforce this Policy. To do so, EHS will:

- Annually inspect AEDs to assure that the responsible person is performing his or her duties under this Policy; that AED batteries are replaced when necessary; and that other Policy requirements are met in accordance with the user and service manuals provided by the manufacturer.

- Maintain a list of AEDs on campus as well as their locations. This list will also be provided to the University's 9-1-1 Center. As required, EHS will also submit the Curaleaf's annual AED report to the Connecticut Office of Emergency Medical Services.
- Notify the responsible person when training is due.
- Work with the responsible person and the building Emergency Coordinator to promote easy access.

COMMITTEE RESPONSIBILITIES

The Safety Committee will monitor and advise EHS and AED owners on the implementation of this Policy.



Volume IV
Sections D-I

D	Proposed Marketing Plan
E	Financial Statements and Organizational Structure
F	Ag cultural and Production Experience
G	Product and Site Safety
H	Cannabis Transport
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I 1	Employee Working Environment
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Brand Logo

The name Curaleaf was chosen to connect “cura”, the latin word for care, with leaf, to signify the plant product. By doing so we phonetically create the word “relief”.

Cura + Leaf



curaleaf

Introduction

Curaleaf has hired the Brooklyn, New York firm Michael Mikulec, LLC to brand and implement the marketing component of this proposal. Michael Mikulec, founder and creative director, has worked on an international scale branding and marketing for such initiatives as NBC's coverage of the Olympics and Fenway Park's 100th Anniversary. Michael was also instrumental in launching both the CW Network and TRUtv as well as rebranding projects for FOX, HGTV & ESPN. Michael is also currently working on the rebrand for CT-N, The Connecticut Network. Michael, originally from CT, received his MFA with a focus on media theory from Yale University.

Our key marketing objective is

The marketing approach for Curaleaf is

The following pages provide a 360° approach to the Curaleaf brand and messaging.

1. Documents such as the articles of incorporation, articles of association, charter, by-laws, partnership agreement, agreements between any two or more members of the applicant that relate in any manner to the assets, property or profit of the applicant or any other comparable documents that set forth the legal structure of the applicant or relate to the organization, management or control of the applicant;

SECRETARY OF THE STATE
30 TRINITY STREET
P.O. BOX 150470
HARTFORD, CT 06115-0470

OCTOBER 25, 2013

DAVID O'MEARA
ROBINSON & COLE
280 TRUMBULL STREET
HARTFORD, CT 06103-3597

RE: Acceptance of Business Filing

This letter is to confirm the acceptance of the following business filing:

Business Name:
CURALEAF, LLC

Work Order Number: 2013310114-001
Business Filing Number: 0004968101
Type of Request: ARTICLES OF ORGANIZATION
File Date/Time: OCT 24 2013 04:00 PM
Effective Date/Time:
Work Order Payment Received: 170.00
Payment Received: 170.00
Credit on Account: 7524.00
Customer Id: 000000414
Business Id: 1122163

JENNA NOME
Commercial Recording Division
860-509-6003
WWW.CONCORD.SOTS.CT.GOV

BUSINESS FILING REPORT

WORK ORDER NUMBER:2013310114-001
BUSINESS FILING NUMBER: 0004968101

BUSINESS NAME:

CURALEAF, LLC

BUSINESS LOCATION:

145 DOUBLING ROAD
GREENWICH, CT 06830

MAILING ADDRESS:

145 DOUBLING ROAD
GREENWICH, CT 06830

MEMBER INFORMATION FOR ONE MEMBER:

NAME:ROBERT D. BIRNBAUM
TITLE:MANAGER

** END OF REPORT **



SECRETARY OF THE STATE OF CONNECTICUT

MAILING ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, P.O. BOX 150470, HARTFORD, CT 06115-0470
 DELIVERY ADDRESS: COMMERCIAL RECORDING DIVISION, CONNECTICUT SECRETARY OF THE STATE, 30 TRINITY STREET, HARTFORD, CT 06108
 PHONE: 860-509-6003 WEBSITE: www.comrecd-scts.ct.gov

**ARTICLES OF ORGANIZATION
 LIMITED LIABILITY COMPANY - DOMESTIC**

C.G.S. §§34-120; 34-121

USE INK. COMPLETE ALL SECTIONS. PRINT OR TYPE. ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.

FILING PARTY (CONFIRMATION WILL BE SENT TO THIS ADDRESS): NAME: David F. O'Meara ADDRESS: Robinson & Cole LLP 280 Trumbull Street CITY: Hartford STATE: CT ZIP: 06103		FILING FEE: \$120 MAKE CHECKS PAYABLE TO "SECRETARY OF THE STATE"
1. NAME OF LIMITED LIABILITY COMPANY - REQUIRED: (MUST INCLUDE BUSINESS DESIGNATION I.E. LLC, L.L.C., ETC.) CURALEAF, LLC		
2. DESCRIPTION OF BUSINESS TO BE TRANSACTED OR PURPOSE TO BE PROMOTED - REQUIRED: ATTACH 8 1/2 X 11 SHEETS IF NECESSARY. SEE ATTACHMENT A, ATTACHED HERETO AND MADE A PART HEREOF		
3. LLC'S PRINCIPAL OFFICE ADDRESS - REQUIRED: (NO P.O. BOX) PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: 145 DOUBLING ROAD CITY: GREENWICH STATE: CT ZIP: 06830		
4. MAILING ADDRESS, IF DIFFERENT THAN #3: PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: CITY: STATE: ZIP:		
5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS - REQUIRED: (COMPLETE A OR B NOT BOTH) <input type="checkbox"/> A. IF AGENT IS AN INDIVIDUAL. PRINT OR TYPE FULL LEGAL NAME:		
BUSINESS ADDRESS (P.O. BOX NOT ACCEPTABLE) IF NONE, MUST STATE "NONE"		CONNECTICUT RESIDENCE ADDRESS (P.O. BOX NOT ACCEPTABLE)
ADDRESS: CITY: STATE: ZIP:		ADDRESS: CITY: STATE: ZIP:
SIGNATURE ACCEPTING APPOINTMENT:		

B. IF AGENT IS A BUSINESS:
 PRINT OR TYPE NAME OF BUSINESS AS IT APPEARS ON OUR RECORDS:

C T CORPORATION SYSTEM

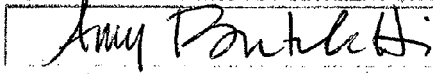
CT BUSINESS ADDRESS (P.O. BOX UNACCEPTABLE)

ADDRESS: **ONE CORPORATE CENTER**

CITY: **HARTFORD**

STATE: **CT** ZIP: **06103-3220**

SIGNATURE ACCEPTING APPOINTMENT ON BEHALF OF AGENT:



PRINT NAME & TITLE OF PERSON SIGNING:

AMY BERLETETTI
VICE PRESIDENT

6. MANAGER OR MEMBER INFORMATION-REQUIRED: (MUST LIST AT LEAST ONE MANAGER OR MEMBER OF THE LLC.)
 ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.


NAME	TITLE	BUSINESS ADDRESS (No. P.O Box) IF NONE, MUST STATE "NONE"	RESIDENCE ADDRESS: (No. P.O Box)
ROBERT D. BIRNBAUM	MANAGER	145 DOUBLING ROAD GREENWICH, CT 06830	145 DOUBLING ROAD GREENWICH, CT 06830

7. MANAGEMENT - PLACE A CHECK NEXT TO THE FOLLOWING STATEMENT ONLY IF IT APPLIES

MANAGEMENT OF THE LIMITED LIABILITY COMPANY SHALL BE VESTED IN A MANAGER OR MANAGERS

8. EXECUTION: (SUBJECT TO PENALTY OF FALSE STATEMENT)

DATED THIS 24th DAY OF October, 20 13

NAME OF ORGANIZER (PRINT OR TYPE)	SIGNATURE
Robert D. Birnbaum	X 

AN ANNUAL REPORT WILL BE DUE YEARLY IN THE ANNIVERSARY MONTH THAT THE ENTITY WAS FORMED/REGISTERED AND CAN BE EASILY FILED ONLINE @ www.concord-sofs.ct.gov. CONTACT YOUR TAX ADVISOR OR THE TAXPAYER SERVICE CENTER AT THE DEPARTMENT OF REVENUE SERVICES AS TO ANY POTENTIAL TAX LIABILITY RELATING TO YOUR BUSINESS, INCLUDING QUESTIONS ABOUT THE BUSINESS ENTITY TAX. TAX PAYER SERVICE CENTER: (800) 382-9463 OR (860) 297-5962 OR GO TO www.ct.gov/drs

ATTACHMENT A

ARTICLES OF ORGANIZATION OF CURALEAF, LLC

Item 2. Description of Business to be Transacted or Purpose to be Promoted, continued.

To accomplish any lawful business whatsoever, or which shall at any time appear conducive to or expedient for the protection or benefit of the Company and its assets; to engage in any lawful act or activity for which limited liability companies may be formed under the Connecticut Limited Liability Company Act; and to engage in all activities necessary, customary, convenient, or incident to any of the foregoing.

12525960-v1

ATTACHMENT A

ARTICLES OF ORGANIZATION OF CURALEAF, LLC

Item 2. Description of Business to be Transacted or Purpose to be Promoted, continued.

To accomplish any lawful business whatsoever, or which shall at any time appear conducive to or expedient for the protection or benefit of the Company and its assets; to engage in any lawful act or activity for which limited liability companies may be formed under the Connecticut Limited Liability Company Act; and to engage in all activities necessary, customary, convenient, or incident to any of the foregoing.

12525960-v1

Delaware

PAGE 1

The First State

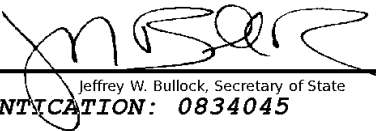
I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "DOUBLING ROAD HOLDINGS, LLC", FILED IN THIS OFFICE ON THE TWENTY-SECOND DAY OF OCTOBER, A.D. 2013, AT 3 O'CLOCK P.M.



5419216 8100

131222260

You may verify this certificate online at corp.delaware.gov/authver.shtml


Jeffrey W. Bullock, Secretary of State
AUTHENTICATION: 0834045

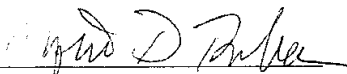
DATE: 10-22-13

State of Delaware
Secretary of State
Division of Corporations
Delivered 03:03 PM 10/22/2013
FILED 03:00 PM 10/22/2013
SRV 131222260 - 5419216 FILE

CERTIFICATE OF FORMATION
OF
DOUBLING ROAD HOLDINGS, LLC

1. The name of the Limited Liability Company is Doubling Road Holdings, LLC (the "Company").
2. The address of the registered office of the Company in the State of Delaware is Corporation Trust Center, 1209 Orange Street, in the City of Wilmington, County of New Castle, Zip Code 19801. The name of its registered agent at such address is The Corporation Trust Company.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Doubling Road Holdings, LLC this 22nd day of October, 2013.


Robert D. Birnbaum
Authorized Person

12525947-v1

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee’s particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

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curaleaf Organizational Plan

Board of Directors				
curaleaf Executive Management				
Production	Products	Controls	Community	Business Infrastructure
<i>State-of-the-art technology and professionalism</i>	<i>Pharmaceutical grade, standardized dose</i>	<i>Independent of production group, reports directly to executive management</i>	<i>Advancing the overall efficacy of medical cannabis</i>	<i>Solid, stable infrastructure for effective operations</i>
<ul style="list-style-type: none"> • Growing • Extracting • Infusion • Delivery Systems • In-house Testing • Packaging 	<ul style="list-style-type: none"> • Multiple strains • Varied delivery systems • Product Development • Research and Development 	<ul style="list-style-type: none"> • Security • Compliance • Transportation • Independent Lab Testing 	<ul style="list-style-type: none"> • Education • Marketing • Dispensary Relations • Community Relations • Substance Abuse Programs • Compassionate Need • Environmental Awareness • Energy Efficiency 	<ul style="list-style-type: none"> • Finance • Human Resources • Legal • Facilities • Administration • Information Technology
<i>Producing pharmaceutical grade, standardized dose Medical Cannabis, for use by an educated medical and patient community to improve health, well-being, and quality of life.</i>				

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Eileen Konieczny
Executive Management

Eileen Konieczny has over 20 years of nursing experience specializing in oncology.

As a family member, early on in her adult life she watched helplessly as her mother succumbed to the devastating effects of pancreatic cancer. This life changing experience was followed closely by a diagnosis of Stage IV Breast Cancer in her sister, who underwent treatment for over 10 years then lost her battle in early 2011. Her brother lived his life struggling with alcohol, substance abuse & diabetes until his death in 2008.

As a healthcare provider, Eileen has witnessed her patients struggle with a host of side effects associated with their treatment protocols which "greatly reduce their quality of life". Her hospital nursing career runs the gamut, high-dose chemotherapy with peripheral stem cell and/or bone marrow transplant rescue, palliative chemotherapy regimens, comfort care, research as well as administrative, working as the over-night supervisor of a 68-bed acute care hospital.

Combining her personal and professional life experiences Eileen has found the unstoppable calling to advocate for medical cannabis. She understands the need to live a happy and full life. Advocating for patients, seeing the whole person, not just an illness or a disease that needs to be treated, is what a nurse does best. Eileen believes in the healing powers that cannabis can provide to those in need.

Since 2008, Eileen has been speaking out and advocating for medical cannabis,

"Every single day that I work I meet at least one patient who would benefit from medical cannabis."

Eileen has spoken at legislative hearings, privately with state legislators throughout the country, attended and spoken at various press conference and town hall type meetings. Close to home, with the passage of Connecticut's medical marijuana legislation in 2012, she was a founding member and Executive Director of the Connecticut Cannabis Business Alliance, a trade association created for the industry by the industry to promote Education, Best Practices and Industry Standards. She is the Founder of Olive's Branch, a patient advocacy organization working to bring healthcare back to its roots; educating healthcare providers, patients and the general public about the benefits of cannabis. Eileen is currently focusing all of her energies to acquiring a medical cannabis production license under the highly regulated Connecticut model.

Recommendations attached hereto:

Dr. Alan Shackleford, MD

Dr. William Voorhest, patient

Deborah Senese, CCP, SPHR

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

April Arrasate
Executive Management

April is a Connecticut resident and a licensed attorney in the states of Connecticut and South Carolina.

Prior to her legal career, April had a career in pharmaceutical research and development. She has worked in the biotech and the academia arms of this field. She is versed in the operation of small cap pharmaceutical start-ups as well as the lab safety, compliance and distribution aspects of such facilities.

April is also a certified medical assistant and as such understands the medical profession and can communicate effectively with medical professionals.

As an attorney, April is well equipped to handle the regulatory aspects of operating Curaleaf. She is also a skilled and effective communicator and strives for transparency and open and frequent dialogue with state and local authorities.

In September of 2008 April's Mother was diagnosed with Breast Cancer. I took a leave of absence from my firm in order to be her full time caretaker. We went through chemotherapy, radiation and a double mastectomy. Two years later the cancer returned with a vengeance and claimed her life on this earth. This experience defines my life and has made me a passionate and experienced patient advocate.

April's transition into patient advocacy coincided with the implementation of the Connecticut Act Concerning the Palliative use of Medical Marijuana. In researching medical marijuana as a patient option, she consulted with her Mother's radiation oncologist, Dr. Andrew Salner, MD. He expressed his approval of the drug as a patient option. Since then, she has been working full time to realize the vision of a pharmaceutical company committed to providing patients with this product thus affording them a wider array of treatment options.

Recommendations:

- Dr. Andrew Salner, MD
- Senator Kevin Witkos
- Chief Ingverson, Simsbury Chief of Police
- Val Guest JD

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Robert Birnbaum
Executive Management

In 2005, Robert co-founded Third Wave Global Investors LLC, a global macro hedge fund in Greenwich Connecticut, and served as its President, Chief Operating Officer, and Chief Compliance Officer, and as Director of the Third Wave Global Master Fund, until 2009. The firm grew from a relatively small investment by its principals to over \$500 million in assets in 2008. Clients included major global banks, large hedge fund-of-funds, and high net worth individuals. Robert was responsible for all aspects of the firm's business (including marketing, client service, compliance, finance, operations, and technology), and his work in creating the firm was featured in 2005 in Global Custodian magazine.

Prior to Third Wave, Robert served from 2001 to 2004 as Managing Director and Head of Institutional Distribution and Client Service for Columbia Management Group (owned by Bank of America), with responsibility for over \$60 billion in assets under management, \$200 million in annual revenue, and 300 employees. During his tenure, Robert integrated 5 separate firms into one coherent sales and marketing organization, with effective positioning to clients, consultants, and prospects, and increased sales to over \$3 billion annually. He was a member of Columbia Management's Operating Committee.

Previously, as Managing Director and Head of Marketing and Global E-Commerce for Credit Suisse Asset Management (1998-2001), Robert was named an Impact Player of the Year by Defined Contribution News (an Institutional Investor publication). He was a member of the Management Committee of CSAM-Americas.

From 1988 to 1998, Robert held a variety of posts at J.P. Morgan Investment Management, culminating in Managing Director and Head of Defined Contribution, and received industry recognition for his innovations. He grew the business at an annual compound rate of 40% to \$120 million in annual revenue.

Robert began his career in the investment management business with The Vanguard Group, where he was the Senior Product Manager responsible for fund development and retirement plans.

Robert is active in community affairs, and currently serves as President of Greenwich Reform Synagogue.

Robert holds an A.B. from Columbia University, and an M.B.A. in Finance (with Distinction) from Wharton.

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Joseph Stevens
Executive Management

Joseph has demonstrated experience establishing and operating both a State licensed medical marijuana cultivation facility as well as a dispensary. Joseph single handedly navigated through NJ's highly restrictive Compassionate Use of Medicinal Marijuana Act and Regulations, opening Greenleaf Compassion Center, the first and only operational facility in the state.

He worked hand in hand with the NJ Department of Health and Senior Services to meet the stringent State compliance requirements including, but not limited to security, inventory management, risk assessment, personnel management, cultivation procedures, and safe patient access. He assisted the Department of Health in establishing laboratory testing including the development of protocol for isolating and identifying quantities of THC, THC-A and CBD's. The results of his success with compliance set the standard for the remaining licensees to meet in order to be approved for becoming operational.

Joseph is notably recognized for becoming the first and only to open and operate Greenleaf Compassion Center, a NJ Alternative Treatment Center for medicinal marijuana. Greenleaf runs a 5,000 square foot cultivation facility as well as a patient dispensary.

Greenleaf Compassion Center was one of six organizations selected by the NJ Department of Health and Senior Services to receive permitting and was the only organization to achieve township approvals, meet the highly restrictive program regulations, and successfully open their doors to the patients of NJ. Greenleaf Compassion Center serves the entire Northern Region of New Jersey and as the only operational facility, opened its doors to patients from the entire state.

He has proven skills in budget management, regulatory compliance, patient education, cultivation design and production, inventory management, and recordkeeping. Prior to establishing Greenleaf Compassion Center, Joseph was a State-licensed funeral director and State-licensed Radiological Technologist. Both positions required him to prepare for and participate in both annually scheduled and unannounced state inspections. His thorough knowledge of State requirements and regulations afforded him success in limiting his employers' exposure to violations and/or penalties.

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Aaron Ford
Director

Mr. Ford is an angel investor and is the co-founder of a start-up private equity firm based in Stamford, Connecticut.

Mr. Ford began his financial services career nearly 20 years ago with Goldman Sachs as a proprietary trader of partners' capital and has held various positions on Wall Street both producing and managing trading, sales and research with a focus on derivatives, structuring, and principal investing. Prior to starting his own private equity firm, he was with BNP Paribas from 2005 through 2010, where he was the Deputy Head of the equities division for the Americas, which included all sales, trading, research, and prime brokerage activities. There he was responsible for approximately 300 professionals with over 500 institutional clients generating nearly \$800 million in gross annual revenues. During his tenure, he was a key contributor and leader particularly in the development of innovative products and new business lines, resulting in his division winning several global awards and top rankings, including Risk Magazine Equity Derivatives House of the Year 2007. He also served on the firm's US Executive Committee, Global Management Committee, and Global Business Committee. Prior to BNP, he worked in trading and sales with UBS and KBC where he specialized in structuring and trading risk management solutions for the largest hedge funds and pensions. He was also the founder of Ford Capital, an early-stage venture capital firm, which eventually was re-established as NetCentric Partners. There he and his partners investigated, funded, and as board members advised start-up technology companies leading to several public liquidity events. Earlier in his career, he managed the global volatility arbitrage portfolio at Veritas Capital, a Greenwich, Connecticut based hedge fund.

Mr. Ford resides in Old Greenwich, Connecticut where he has lived for approximately 16 years and where has been very involved with his community through his religious organization (executive board, investment committee) and local high schools (assistant coach, investment committee) on a volunteer basis.

Worked for SEC registered firms from 1994-2010. Prior FINRA Registrations: Series 7, 3, 24, 4, 63. No customer complaints, violations, administrative, or regulatory actions in any role.

Beta Gamma Sigma, MENSA, Triple Nine Society

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Andrew Sieghart
Director

Mr. Sieghart is a real estate investment professional, and is currently the Managing Partner of Framework Capital Partners, a real estate private equity firm based in Connecticut.

Prior to Framework Capital Partners, Mr. Sieghart worked for G2 Investment Group in New York as Vice President of the firm's real estate division, G2 Real Estate Partners. In addition to being responsible for deploying the firm's capital into senior and subordinate mezzanine debt and direct-equity investment opportunities across all commercial property sectors, Mr. Sieghart resolved or restructured over 50 real estate deals with a principal balance of over \$19.0 billion as part of G2's real estate advisory and restructuring business.

Before joining G2, from 2006 to 2009, Mr. Sieghart was with Lehman Brothers, the global investment bank, serving as Vice President in its Global Real Estate Group. During his time in New York, Mr. Sieghart oversaw the financial analysis, structuring, and due diligence for transactions totaling \$34.4 billion. Based on his experience and expertise, Mr. Sieghart was asked to relocate to Hong Kong to join a select team, the Principal Transactions Group, which managed over \$12 billion of real estate investments across Asia Ex-Japan. Ultimately, the Principal Transactions Group was acquired by Nomura Securities.

Mr. Sieghart began his career at Standard and Poor's as a member of the Real Estate Structure Finance Group. During his tenure at S&P, Mr. Sieghart was lead analyst for eighteen CMBS and two CDO transactions totaling \$36.8 billion.

Mr. Sieghart received a law degree from American University, Washington College of Law, and is a member of the NY State Bar, and received a BA from Bucknell University where he majored in both finance and economics.

Mr. Sieghart was born and raised in Greenwich, CT and now lives in New Canaan, CT with his wife and three children, where he is an active part of the community. Member of the New York State Bar since 2004.

From 1997 – 2011 worked for SEC registered and FINRA/SIPC member firms.

From 2007 – 2009 was licensed by the Hong Kong Securities and Futures Commission (SFC).

No customer/client complaints, violations, administrative, judicial or regulatory actions in any role.

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Sandy Soule
Investor

Contact



Context

Please fill in the following areas as they are relevant to the person's ability to

- Carry out their designated role
- Successfully complete work on projects of a similar size and scope, in the same or a comparable line of business.

Education/Training

Sandy holds a B.A from Mt. Holyoke College.

Qualifications/Skills

Writing, editing, marketing, communication, personnel, senior management.

Experience

Following her retirement from her position as Vice-President, Marketing from BedandBreakfast.com in 2010, Sandy increased her long-time involvement in two Connecticut non-profits, Jewish Family Services of Greenwich (JFS) and Greenwich Reform Synagogue (GRS). For JFS, Sandy serves as secretary of the Executive Committee, and has been instrumental in such projects as celebrating the 25th anniversary of the Supermarketing for Seniors program, a free service for low-income homebound seniors; she also used her internet and marketing experience to update the agency's website at www.jfsgreenwich.org. For GRS, Sandy has utilized her experience in both marketing and real estate to update the synagogue's website and also to co-chair the GRS New Building Committee, involving the selection of a site, architect, owner's rep, and much more.

Prior to retirement, Sandy worked from 1999 to 2010 as Vice-President, Marketing for BedandBreakfast.com. Responsibilities ranged from extensive writing and editing of online and printed materials for both consumers and innkeepers for a variety of business and consumer products, to strategic planning, to wide-ranging educational speaking assignments, both in person and via internet conferencing. During the same period, Sandy was a managing partner in Wolf Soule Realty LLC, primarily focused on the development of a 25-home residential subdivision in Gardiner, New York.

Earlier in her career, Sandy worked as the marketing director for the Council on International Educational Exchange, a leading non-profit agency in the field of international education. She went on to write a series of top-selling series of B&B/inn guidebooks, inaugurated the Internet's first independent advertising inn directory, and established her own website. As a B&B expert, she wrote for or was interviewed by major print, radio, and TV media.

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Jack Rubin
Investor

Contact	[REDACTED]
Context	<p>Please fill in the following areas as they are relevant to the person's ability to</p> <ul style="list-style-type: none"> • Carry out their designated role • Successfully complete work on projects of a similar size and scope, in the same or a comparable line of business.
Credentials/ Accomplishments	Over the past thirty years I have played a integral role in the start-up of several entities including companies, funds and investment vehicles that involved over \$4 billion of equity investment.
Education/Training	Bachelor of Science in Commerce from the University of Virginia and Master of Business Administration from Dartmouth College
Qualifications/Skills	Key accomplishments hinged on the ability to bring focus to concepts and convert to launch through determining the concrete steps required for progress.
Experience	Currently Jack is a General Partner of a real estate fund specializing moderate income housing in the Midwest. Previously he served in the asset management and private banking group of Credit Suisse and its predecessor, Donaldson, Lufkin & Jenrette as a Managing Director. Earlier in his career he practiced real estate finance in the investment banking department at Merrill Lynch and at LaSalle Partners.
Competence Past Legal And Regulatory Compliance:	Jack has served over 20 years in highly regulated environments governed by the SEC and FINRA with no remarks or violations.

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Kyle Rusconi
Investor

Contact

██████████ ██████████

Context

Please fill in the following areas as they are relevant to the person's ability to

- Carry out their designated role
- Successfully complete work on projects of a similar size and scope, in the same or a comparable line of business.

Credentials/
Accomplishments

Over the past thirty years I have played a integral role in the start-up of several entities including companies, funds and investment vehicles that involved over \$4 billion of equity investment.

Education/Training

- Villanova University B.S. Finance 1995
- FINRA / General Securities Representative Series 7, 24, 55, 63 (2005 –2012)
- Japanese Securities Trading License (2002-2005)
- Australian Securities Trading License (1999-2004)

Experience

During a 17-year trading career I worked for major multi-national financial institutions managing the institutions own capital. I began as a junior trading assistant in 1995 and ended my trading career in 2012 as the Global Head of Proprietary Trading. I spent parts of my career as the local, regional, and global trading desk head in Sydney, Tokyo, and New York.

I have been an active investor in private equity ventures for the last 8 years. My support has been focused on technology and biosciences. I now serve on the Board of Directors of an Israeli-based 3D mapping technology named Geosim Systems LTD.

Currently, through solely owned Reroot LLC, I am focused on bringing healthy, organic eating solutions to consumers in a daily "Grab and Go" format under the trade name "Cocobeet".

Cocobeet evolved this past year after my wife battled breast cancer at age 36. She was determined to fuel her body right going forward to improve her wellbeing and increase her odds of long-term survival to ensure she could actively raise our three young girls.

(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production facility;

Eileen Konieczny



Professional Experience

2013- current	Olive's Branch, NY/CT Founder/Patient Advocacy
2013- current	American Cannabis Nurses Association Board Member
2013- 2013	Connecticut Cannabis Business Alliance, Connecticut Executive Director /Patient Advocacy
2010 – 2013	On-Assignment Registered Nurse/ Travel assignment
2010- 2013	Greenwich Hospital, Greenwich, CT Registered Nurse /Medical Oncology
2008-2010	Northern Dutchess Hospital, Rhinebeck, NY Nursing Supervisor
2005-2009	Vassar Brothers Medical Center, Poughkeepsie, NY Registered Nurse/Oncology/Medical/Surgical/Float Pool
1993-2001	Hackensack University Medical Center, Hackensack, NJ Registered Nurse/Oncology Research/Oncology/Bone Marrow Transplant Unit (inpatient)/Diabetes/Medical
1992-1993	Kent County Memorial Hospital, Warwick, RI Registered Nurse/Medical Surgical

Licensure

CT Registered Nurse License #096716
NYS Registered Professional Nurse # 566932-1
BLS Healthcare Provider

Memberships

2013 - Current	Society for Cannabis Clinicians
2013 - Current	American Cannabis Nurse's Association
2013 - Current	Oncology Nurse's Association

Education

1992	Felician College, Lodi, NJ Associates of Science Degree in Nursing
------	------------------------------------------------------------------------------

Trade Experience

2010	Oaksterdam University, Oakland, CA Basic & Advanced classes
------	-----------------------------------------------------------------------

Military

1983 – 1988	United States Navy Top Secret Security Clearance/Good Conduct Award Honorable Discharge
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(2) A current organizational chart that includes position descriptions and the names and resumes of persons holding each position to the extent such positions have been filled. To the extent such information is not revealed by their resume, include additional pages with each resume setting out the employee's particular skills, education, experience or significant accomplishments that are relevant to owning or operating a production

Alan Shackelford, M.D.
Amarimed of Colorado
2257 South Broadway
Denver, Colorado 80210

Telephone: 720-532-4744

Fax: 303-595-5284

November 1, 2013

To whom it may concern:

I have known Eileen Konieczny since April, 2010 when she attended a presentation of research findings on the medical uses of cannabis I delivered to a national conference. In the intervening three years, I have come to know Eileen as an extraordinarily dedicated and caring oncology nurse whose commitment to the well-being of the many patients she has served has always far exceeded what would normally be expected of even the most competent of nurses.

Eileen's dedication to patient care led her to investigate the medical uses of cannabis and to advocate for the recent passage of legislation in Connecticut that allows seriously ill patients to use cannabis as a treatment option. Her involvement in the political process ranged from assisting patients in contacting their elected representatives in support of the legislation to meeting with legislators at the highest levels of state government.

In this capacity Eileen invited me to meet with them as well. I had advised Colorado State Senator Chris Romer on the medical uses of cannabis during the deliberations on legislation regulating medical cannabis in Colorado in 2012, and have served on the Colorado Department of Revenue Medical Marijuana Enforcement Division's advisory work group since 2011. Eileen encouraged me to bring that experience in regulating medical cannabis at the state government level in Colorado to the discussion in Connecticut. On several occasions in 2011 and 2012, I met with legislators and aides to the Governor together with Eileen, and testified in the joint House and Senate Judiciary Committee hearings in March of 2012. I found Eileen to be extremely knowledgeable on the medical uses of cannabis and dedicated to seeing that patients in Connecticut would be able to benefit from its use just as patients in Colorado have.

She and I have continued to cultivate a professional relationship that has enabled me to refer patients in the Northeast to her for consultations on the potential benefits of using medical cannabis in their individual cases with the confidence that she will advise them competently and effectively.

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Eileen also remains dedicated to furthering scientific inquiry into the medical uses of cannabis so that patients will be able to benefit from new innovations in the field.

It has been privilege to work with Eileen in advancing the treatment options available to patients who might benefit from the medical use of cannabis, and I look forward to continuing our association for the benefit of the patients we serve.

Please contact me if you have any questions.

A handwritten signature in blue ink, appearing to read "Alan Shackelford, M.D.", with a stylized flourish at the end.

Alan Shackelford, M.D.

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To Whom it Concerns,

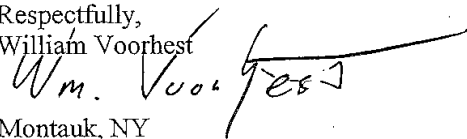
I know Eileen Konieczny as an oncology nurse & cancer patient advocate for the use of Medical Cannabis as well as its derivative extract, cannabidiol. In 2012 my girlfriend Robin, at 59, was diagnosed with metastatic breast cancer throughout her bones. I began searching for information about Medical Cannabis for treatment of cancer & the side effects of chemotherapy but I needed to know more beyond what I could find online. I was referred to Ms. Konieczny by a representative from Dixie Elixirs of Denver, Co. for consultation.

Ms. Konieczny very kindly shared her knowledge & experience working with cancer patients as well as her observations of the palliative benefits of Medical Cannabis with both Robin & myself. Robin was prepared & willing to try Medical Cannabis as a treatment supplement but died before she could acquire any. That she was not able to try it is entirely due to the extreme difficulty in acquiring Medical Cannabis. I am convinced that Medical Cannabis would have eased her bone pain & reduced her dependency on opioid based pain medications which very negatively effected her digestive system causing a perforated colon, requiring surgical intervention & hastening her death. I feel Robin would have also lived longer with less suffering & been able to make better final preparations had Medical Cannabis been available to her.

Nonetheless, Ms. Konieczny provided hope & solid guidance when it was being sought. That this treatment was unavailable to Robin only serves to underscore the need for its being accessible to all patients who it would benefit. Ms. Konieczny, in her capacity as an oncology nurse for 20 years has chaired many women's cancer support groups & has witnessed firsthand the physical relief & the improvement in morale in those women who had access to Medical Cannabis.

Ms. Konieczny's presence on the management board of any Medical Cannabis dispensary program would serve both patients & the licensing governing state. She will bring long experience, compassion & critical oversight to what needs to be the careful stewardship of this demonstrably needed addition to open & sanctioned patient care.

Respectfully,
William Voorhest


Montauk, NY

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DEBRA A. SENSEL, CCP, SPHR

2064 Royal Fern Ct., 12 b
Reston, VA 20191

(301) 331-9906
debsensel@hotmail.com

To whom it may concern:

Eileen Konieczny is a one-of-a-kind person and nurse/health practitioner. Her commitment and passion to help others is unique. If each of us exhibited an iota of Eileen's devotion, love and caring for her patients, the world would be truly a different place.

I had the privilege of meeting Eileen under anything but ideal circumstances. I was out of town visiting a lifelong friend (36-year relationship) in Greenwich for Christmas. My friend had been diagnosed with stage four cancer eleven months prior. Eileen was one of his nurses that first week in the oncology wing.

After being discharged, I stayed with Richard every weekend. We saw Eileen when Richard would return for his injection after chemo. It was obvious that an incredible bond had been formed between the two of them. Her positive and uplifting, yet very practical advice was felt by both Richard and anyone who accompanied him. She was able to assist with Richard's discomfort, physically and emotionally, with medical information regarding cannabis.

When Richard was re-admitted the week after Christmas, the doctor communicated that he had weeks to maybe months left to live. Richard transitioned/died eight days later while in the hospital. It was during this period especially that it felt Eileen had become family. She came and spent the entire day with Richard and me on her day off! It is difficult to articulate what a gift she gave both of us. Her very presence and monitoring of Richard's condition and her empathy for me was something I have never witnessed in the healthcare profession.

Eileen and I have stayed in touch with almost two years approaching since his death. Aside from caring for her personal family, she has obviously made it her mission to make a difference in the lives of many, along with changing regulations regarding the use of cannabis. She's my hero!



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APRIL ARRASATE

EXPERIENCE

Founder, curaleaf, llc

Since founding this entity, I have been working full time to realize the vision of a pharmaceutical company committed to provide patients who suffer with debilitating medical conditions a wider array of treatment options. The process has drawn on my experience as an attorney, my history in pharmaceutical research and development, my interactions with patients as a medical assistant and my recent pursuits in patient advocacy.

Sole Practitioner, Law Offices of April Arrasate, Farmington, CT 2012-Present

Founder and sole operator of law firm specializing in transactional law including but not limited to contract review, contract negotiations, purchase and sales agreements. I am a member in good standing of both the South Carolina and the Connecticut Bar Associations.

Owner, Core23, LLC, Collinsville, CT 2012-Present

Co-owner and operator of an art gallery/antique store called "The Flea Circus" located in the heart of a river side tourist town. Operate with my siblings as a tribute to our Mother and as a hobby. Our enterprise recently won Connecticut Magazine's "Best of Connecticut" award and we are proud of the goodwill associated with the store.

Caretaker, Farmington, CT 2008-2011

In September of 2008 my Mother was diagnosed with Breast Cancer. I took a temporary leave of absence from my firm in order to be her full time caretaker. We went through chemotherapy, radiation and a double mastectomy. Two years later the cancer returned with a vengeance and claimed her life on this earth. This experience defines my life and has made me a passionate and experienced patient advocate.

Associate, Parsons, Ouverson, Stark & Guest, Murrells Inlet, SC 2008-2010

Practiced civil litigation in several areas of the law; Construction litigation, personal injury and real estate. Utilized a host of people management skills handling divorce, property division and custody issues for my family court clients.

Associate, Jeffcoat Law Firm, Myrtle Beach, SC 2007-2008

Associate for a busy real estate firm who emphasized my role in networking, social media and community involvement. Personally handled advertising and client development.

Medical Assistant, Podiatry Group of Southington, Southington, CT 2002-Present

Certified Podiatric Medical Assistant and X-ray technician in a busy Doctor's office. Patient care, record keeping and familiarity with the surgical environment were an excellent precursor to client maintenance in every occupation I have had. I maintain some hours here presently.



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APRIL ARRASATE

Research Assistant, Channing Laboratory, Boston, Massachusetts 2000-2002

This lab is a division of Harvard Medical School and Brigham and Women's Hospital, where I worked as a research assistant in the field of Microbiology. My team studied the potential medical benefits of a particular protein, present in the b.fragilis microbe, which we then presented and marketed to the drug manufacturer Eli Lilly. While this was a research job, I gained practical experience in marketing a drug product that is not entirely understood by the buyer.

Genzyme Pharmaceutical Company, Boston, Massachusetts 1998-2000

Genzyme was a small startup committed to "discovering and delivering transformative therapies for patients with rare and special unmet medical needs, providing hope where there was none before." I began here as an intern while completing my undergraduate degree. This introduction to pharmaceutical R & D provided me with lab experience and sparked my interest in the field.

EDUCATION

Thomas Jefferson School of Law San Diego, CA:

J.D., 2007, Cum Laude, Law Review

Suffolk University Boston, MA:

B.A., 2000 Maj. Biology, Min. Chemistry, Spanish

University of Malaga, Malaga, Spain

1996, Spanish Language Certification

REFERRALS

Steven Ouverson, JD: (Managing Partner, POSG, PA) 843-357-8888

Dr. Andy Salner, MD: (Radiation Oncologist, Hartford Hospital) 860-545-2803

Dr. Arthur Tzianabos, PhD : (Lab Director, Channing Laboratory)

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Frederick C. Parsons, III*+
Stephan C. Ouverson
Martin L. Stark
Thomas D. "Val" Guest, Jr.*
Joseph S. Sandefur

Thomas D. "Val" Guest, Jr.
Direct Line: (843) 652-7402
vguest@posglaw.com

*Certified Mediator

+of Counsel

November 11, 2013

To Whom It May Concern:

I am writing this letter as a professional and personal reference for April Arrasate. I am a partner in the firm of Parsons, Ouverson, Stark, Guest, and Sandefur, PA. I have been practicing law as a litigation attorney for over twenty four years in the areas of criminal defense, personal injury and domestic law. I am also a former solicitor (district attorney) for the 12th Judicial Circuit which includes Horry and Georgetown Counties and also prosecuted for the cities of North Myrtle Beach, Surfside Beach, and Florence.

April Arrasate was an associate in our busy litigation firm. I was April's immediate supervisor and had a chance to observe her work on a daily basis. April was an intelligent and dynamic addition to our firm and we were sad to see her go. She was a versatile worker who worked in a variety of our practice areas and she was always thorough and well prepared in all the work she performed.

April's myriad of skills positively contributed to the firm as a whole. April is a strong writer and has a practical approach in her writing process that allows her to distill large volumes of information down to their most essential components. She wrote several winning arguments for the firm. April was an asset in the courtroom as well. She has an eye for detail both procedurally and substantively and she won, settled and/or resolved many cases.

April is very adept at client management. She has an ability to keep clients positively focused and on task even when the client is usually facing difficult and sometimes emotional times. These interpersonal skills also extended to her fellow attorneys and the office staff as a whole. She has a remarkable ability to inspire employees to produce at peak level and also to deliver constructive criticism in an effective and amiable manner. I believe these skills provide her with all the experience she will need to own and operate a large company.

April was working for our firm when her mother was diagnosed with a recurrence of breast cancer. She took a leave of absence to be with her Mother during this difficult time. When April decided to leave the firm to pursue another path as a patient advocate, we supported her decision and she has kept us abreast of her progress.

I am not necessarily versed on the topic of medical marijuana, but I know that in some states it has been a platform to recreational use. I also know that it is federally illegal as a schedule I controlled substance.

11915 Plaza Drive • P.O. Box 2850 • Murrells Inlet, SC 29576
Telephone: (843) 357-8888 • Facsimile: (843) 357-9991

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That being said, I have spoken with April about the highly medical and highly regulated Connecticut model. I believe that based on her professional and personal experience, personal sense of responsibility and earnest motivations, her operation will be indistinguishable from a successful, pharmaceutical research and production company.

If you have any questions or require any further information, please do not hesitate to contact me directly.

Sincerely,



Thomas D. Guest, Jr.

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Helen & Harry Gray
Cancer Center

80 Seymour Street, Hartford, CT 06102 860-545-2852

October 22, 2013

To whom it may concern:

I am writing this recommendation as a personal reference for Ms. April Arrasate.

I met April in 2009 in as she is the daughter of my now deceased patient, Rachel. Rachel was diagnosed with breast cancer in the fall of 2008 and I was her radiation oncologist. April was her Mother's excellent advocate and caretaker throughout her cancer journey. In 2010, Rachel's cancer returned and spread to the lining of her brain. She was hospitalized and I prescribed treatments to her brain. April never left her Mother's side. For close to eight weeks she advocated for the best care and treatment options available and lived here in Hartford Hospital with her Mother. She ultimately took her Mother home to die in the comfort of their home.

April's commitment and reasoned advocacy at such a difficult and emotional time left a lasting impression here for me and our staff. Since the death of her Mother, April has come in to speak with me several times about the changing course of her life. April is an attorney by trade, but as her Mother's full time advocate and caretaker, she had been away from her firm for almost four years. She had an undergraduate degree and several years of experience in biochemistry and biotechnology and she was searching for a way to use her combined skills to advocate for and improve the lives of patients in her Mother's honor.

When April sought my opinion on medical marijuana as a patient option, I informed her that I was in favor of any drug that could add to the physician armament and provide patients with safe and effective options. Since then, she has been searching for a way to be a part of this process in the state of Connecticut. I spoke to her recently about her concerns in the existing medical marijuana marketplace regarding standardized dosing and forms of consumption that do not require smoking. I believe that April, with her particular background, is genuinely exploring these issues. She is truly hoping to create a medical product line that she would have felt comfortable offering her Mother.

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I believe that April's background, both personally and professionally, makes her an ideal candidate for contributing meaningfully. I believe that her fierce commitment to her Mother is highly likely to translate into a commitment to help many cancer patients.

Sincerely,



Andrew L. Salner, MD FACR
Director, Helen & Harry Gray Cancer Center

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Kevin D. Witkos

November 8, 2013

Commissioner Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Harford, CT 06106

Dear Commissioner Rubenstein,

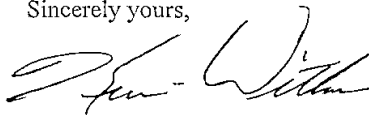
I am writing to you as a proponent of the use of medical marijuana and supporter of the recent legislation allowing Connecticut to license certain growers to cultivate the cannabis to be used for such palliative purposes. I have come to know personally several members of the Curaleaf Group, and would heartily endorse them as being the type of group that could efficiently, responsibly, and professionally deliver the necessary product for use by state residents suffering from debilitating diseases. I am truly confident that the Curaleaf vision and mission rises to the level of what the bill intended.

Curaleaf consists of legal and medical professionals who are patient advocates and who intend to provide standardized doses of legally compliant forms of medicine for qualifying patients. I have seen their business plan presentation and I believe they have pulled together a team of agricultural, production and science experts to accomplish this task. I am confident Curaleaf has Connecticut's qualifying patients' best interests in mind and is committed to discouraging the recreational use of marijuana.

I know April Arrasate as we are both small business owners in the town of Canton where she has been an active participant in community affairs. I believe that as Chief Operating Officer of Curaleaf she will continue to be active in the community and be an overall benefit to our citizens.

Once again, I strongly support any licensure application for Curaleaf, and believe that granting them such approval will be in the best interests of the state, its residents, and in keeping with the spirit and letter of the law. Thank you in advance for considering my opinion in this matter, and please feel free to contact me if you should have any additional questions or concerns.

Sincerely yours,



Kevin Witkos

phone: 860-693-3985 | cell 860-221-5162 | 15 High Ledge Rd, Canton, CT 06019 | Witkos@comcast.net

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Simsbury Police Department

933 Hopmeadow Street P.O. Box 495 Simsbury, CT 06070



PETER N. INGVERTSEN

CHIEF OF POLICE

October 30, 2013

Commissioner William M. Rubenstein
Department of Consumer Protection
165 Capitol Avenue
Hartford, Connecticut 06106-1630

Dear Commissioner Rubenstein:

I am writing to inform you of my knowledge of the organization *curaleaf*, llc, a group seeking a medical marijuana production license in the Town of Simsbury, Connecticut.

I have spoken with *curaleaf* COO, April Arrasate, and she has informed me of the mission, the history and the experience behind the *curaleaf* group. April Arrasate is an attorney in the State of Connecticut with a background in pharmaceutical research. More notably she is the daughter of an acquaintance of mine, Dr. Leo Veleas, who I know to have lost his wife, Rachel, to breast cancer in February of 2011. The loss of Rachel changed the course of April's life such that she has since become a patient advocate. That path has culminated in this organization as a means to expand the pharmaceutical options available to critically ill patients. Based on my knowledge of this history, I believe that the *curaleaf* group is truly interested in medical marijuana as a pharmaceutical and not as a path to recreational use.

As I do not live in Simsbury, I cannot represent the community. However, I can relay that the Town's Zoning Board, after hearing from *curaleaf* on the issue, voted unanimously to allow for the operation of a medical marijuana cultivation facility by special permit in the Town of Simsbury.

I am writing solely to inform the Department of Consumer Protection that April Arrasate, as COO of *curaleaf*, has reached out to me as the Simsbury Police Chief, and asked me to work alongside *curaleaf* in ensuring proper security measures, avoidance of theft and diversion, and proper transport methods.

Headquarters (860) 658-3100
Administration (860) 658-3105

Facsimile (860) 658-6682

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If *curaleaf* is granted a production license, I will do everything in my power to ensure that the project is rolled out safely and effectively, in a manner that will be mindful of the citizens of Simsbury and beneficial to the community as a whole.

If you have any questions, please feel free to contact me directly.

Sincerely,



Peter N. Ingvertsen

Cc: Mary A. Glassman, First Selectman, Town of Simsbury
Thomas Cooke, Director of Administrative Services, Town of Simsbury
Hiram Peck, Director of Planning, Town of Simsbury

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Robert Birnbaum



Summary: A senior executive, known for creativity, effectiveness, investment knowledge, and strategic orientation, with a 30 year track-record in both retail and institutional businesses.

Professional Experience

Third Wave Global Investors

2004-2009

Co-Founder, President, Chief Operating Officer, Chief Compliance Officer
Responsible for all aspects of the firms business (including marketing, client service, compliance, finance, operations, and technology)

Columbia Management

2001-2004

Managing Director, Head of Institutional
Responsible for over \$60 billion in assets under management, \$200 million in annual revenue, and 300 employees.
Member of Management Committee.

Credit Suisse Asset Management

1998-2001

Managing Director
Head of Marketing, Head of e-Commerce,
Member of America's Management Committee

J.P. Morgan Investment Management

1989-1998

Managing Director,
Head of Defined Contribution.
-headed strategic process and negotiations leading to a \$900 million transaction.
-achieved 40% annual compound growth in Defined Contribution (DC) revenues for five years.
-responsible for \$120 million in revenues

Head of Marketing Strategy and Communications

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Robert Birnbaum, page 2

Fred Alger Management

1987-1989

Vice President, head of Mutual Funds

-recruited to launch direct-marketed mutual fund family; in difficult environment for growth managers, restructured to focus on variable annuity/life insurance funds. Alger became one of the insurance market's major providers, with over \$1.5 billion AUM. Direct family reached \$400 million under my guidance.

The Vanguard Group

1985-1987

Assistant Vice President, Senior Product Manager

-responsible for all product launches and tax advantaged products, including Individual Retirement Accounts. Achieved highest conversion rate and average balance in direct industry. Responsible for all advertising content. Developed Vanguard's first 7x24 phone center capability.

American Future Systems, Inc.

1976-1983

variety of positions, culminating in Director of Marketing. Ran two direct sales divisions, two telemarketing divisions, and one direct mail division.

Education

MBA

The Wharton School, 1985. Graduated with Distinction, 3 times Dean's Honors List. Finance major.

AB

Columbia University, 1975. Pre-med and anthropology major.

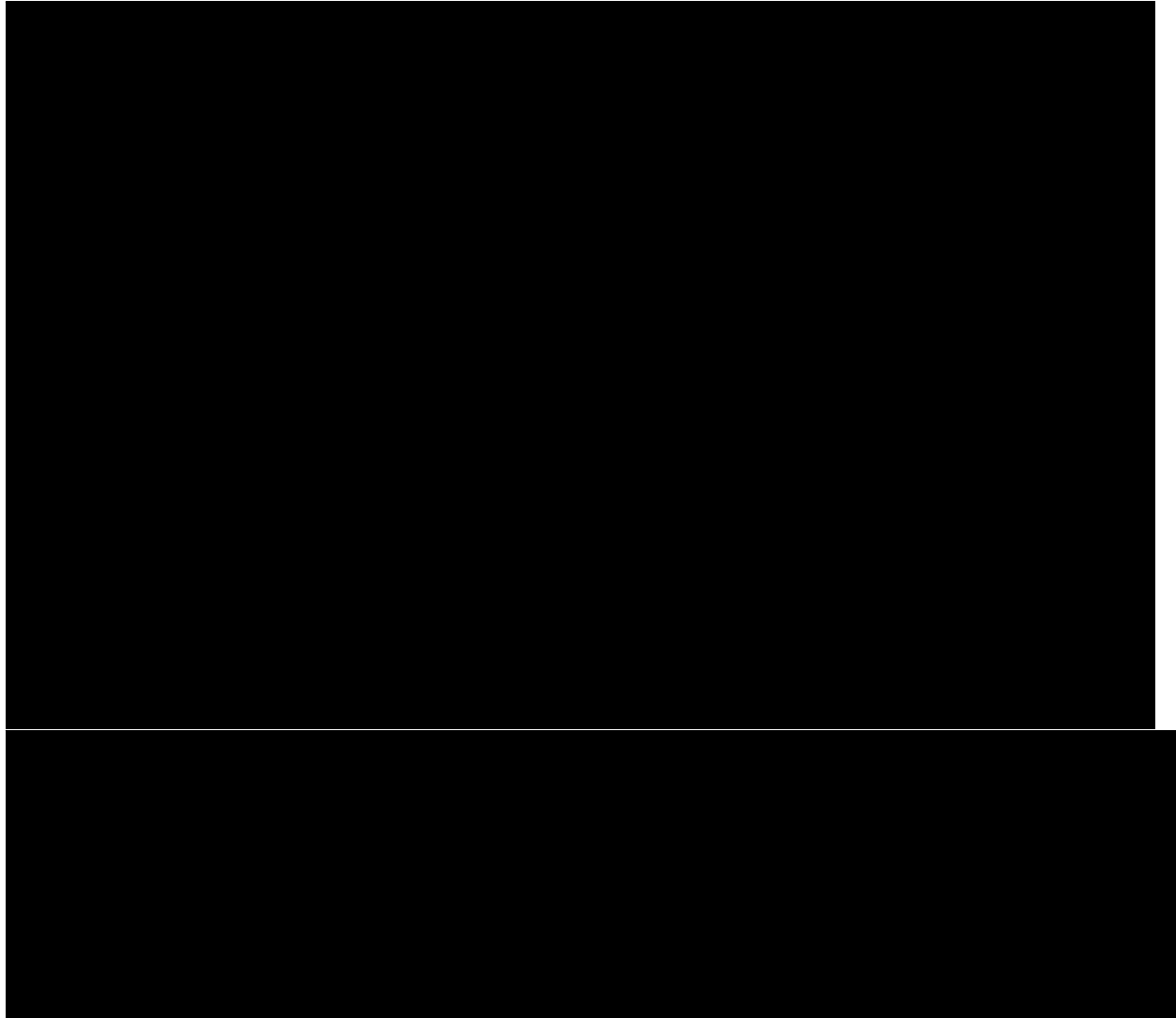
Personal

President, Greenwich Reform Synagogue

(3) A copy of all compensation agreements with producer backers, directors, owners, officers, other high-level employees or any other persons required to complete Appendices B, C or D. For purposes of this RFA, a compensation agreement includes any agreement that provides, or will provide, a benefit to the recipient whether in the form of salary, wages, commissions, fees, stock options, interest, bonuses or otherwise;

Produceco Management Incentive Plan

October 6, 2013



4. Describe the nature, type, terms, covenants and priorities of all outstanding bonds, loans, mortgages, trust deeds, pledges, lines of credit, notes, debentures or other forms of indebtedness issued or executed, or to be issued or executed, in connection with the opening or operating of the proposed production facility;

None

5. Provide audited financial statements for the previous fiscal year, which shall include, but not be limited to, an income statement, balance sheet, statement of retained earnings or owners' equity, statement of cash flows, and all notes to such statements and related financial schedules, prepared in accordance with generally accepted accounting principles, along with the accompanying independent auditor's report. If the applicant was formed within the year preceding this application, provide certified financial statements for the period of time the applicant has been in existence and any pro forma financials used for business planning purposes.

Audited Financial Statements for

Curaleaf, LLC

■

and its parent

Doubling Road Holdings, LLC

6. Provide complete copies of all federal, state and foreign (with translation) tax returns filed by the applicant for the last three years, or for such period the applicant has filed such returns if less than three years.

7. Provide complete copies of the most recently filed federal, state and foreign (with translation) tax returns filed by each: (i) producer backer; and (ii) each backer member identified in Section B of Appendix B.

Please see accompanying box labeled Curaleaf backer tax returns:

■

Describe the experience of the applicant in agriculture and other production techniques required to produce pharmaceutical grade marijuana or to manufacture marijuana products. For purposes of this response, you may include the experience of any person employed by the applicant, including the person's name and position with the applicant.

The Curaleaf founders have developed a cultivation strategy that will utilize the knowledge of experts in the following industries:

- Cultivation and large scale production and distribution of medical Cannabis in the state of Colorado.
 - JASON CRANFORD, Rifle Mountain Dispensary
- Production and operation of a heavily regulated medical marijuana operation in New Jersey
 - JOSEPH STEVENS, Greenleaf Compassionate Care Center
- Large scale extraction and infusion of plant compounds on a national level.
 - APPLIED SEPARATION, representative Joe Stefkovich
- Large scale organic agricultural production in the state of Connecticut
 - RENEE GIROUX
- Large scale cultivation equipment and design in the state of Connecticut.
 - COLIN COOGAN, CT Roots/Greenup Group

The experts covering these areas will assist Curaleaf in:

- Strain selection and cultivation
- Healthy, unadulterated product
- Organic cultivation methods
- State of the art cultivation equipment
- Effective Processing
- Ability to produce on a large scale
- Hiring and training of an experienced cultivation staff.

Jason Cranford

Jason Cranford – Chief Cultivation & Production Consultant
Boulder, Colorado

Jason Cranford has been a specialist in horticultural sciences for over twenty five years. He is one of the top horticultural scientists in the United States and has proven himself time and again as one of the leading experts in the cultivation of naturopathic and botanical medicaments.

Jason is an expert in the sequencing of hybrid cannabis taxa and variants. He was awarded the prestigious Cannabis Cup, specifically to entries of cannabidiol (CBD) producing phenotypes.

Jason Cranford's award winning specimen was an organically produced cannabis phenotype, hybridized over a three year period and tested with a certificate of analysis recording the highest yielding organic CBD (cannabidiol) yield known to date at over 34%.

Jason's has extensive experience in the design, construction, operation and establishment of agricultural farms, including the cultivation of organic, non-pesticide medical cannabis. He is also a seasoned owner and operator of a large scale production and dispensary facility in Colorado named Rifle Mountain.

Jason is the inventor of Cannatol™, a phyto-medical compound, derived principally from a highly standardized, consistent and high yielding organic cannabidiol phyto stock, free from pesticide and mold contaminants.

Curaleaf has contracted with Jason after interviewing scores of cultivation experts and concluding that Jason has the most advanced knowledge of genetics, cultivation and large scale production available in the industry.

Joseph Stevens

Joseph Stevens- Production Consultant/ Chief Compliance Officer
Montclair, NJ

Joseph Stevens, Curaleaf's Compliance Officer, is the founder of Greenleaf Compassion Center, New Jersey's first and only operational medical marijuana alternative treatment center (ATC) in the state. New Jersey was the first state to enact highly regulated regulations including strong governmental oversight. Greenleaf Compassion Center was the only ATC able to pass the rigorous and extremely restrictive Department of Health requirements.

In his role as CEO and President, Joseph took a hands on approach to building the organization and personally planned, implemented, and participated on a daily basis in all aspects of the cultivation facility. He has several years' experience cultivating pharmaceutical grade marijuana from seed to sale. The product is required to be State laboratory tested for heavy metals, microbiological contaminants, mycotoxins, and pesticides. All of Greenleaf's harvests passed these tests without issue.

Joseph designed a hybrid soil/hydroponic 5000 sq. foot facility utilizing high pressure sodium lighting. Plant nourishment is exclusively organic. The grow contains only female plants and mother plants are consistently maintained for cloning to ensure consistent, quality production.

Joseph worked directly with the Department of Health and the State laboratory to establish testing procedures that would guarantee safe and organic patient medication.

Joseph is also working with Applied Separations, one of the world's leading manufacturers of carbon dioxide extraction machinery. Together, they are working on processes to extract cannabinoids from marijuana plants to create pharmaceutical grade products such as gel caps, lozenges, and inhalers. This is new to the medical marijuana industry in that the extraction process is chemical and solvent free, leaving no harmful residues. Of significant importance is the ability to create product with standardized dosage. This will be the first opportunity for patients to have access to products in forms other than dried product, that must be smoked, in which they can be confident they are ingesting a consistent dosage each and every time. Once Curaleaf is awarded their license, this technology will be implemented at Curaleaf to ensure a quick implementation of safe products to the patients of Connecticut.

Applied Separation

Applied Separation- Extraction and Infusion Consultant/Equipment and Training

Applied Separations Inc. (ASI) has been a leader in Supercritical Fluid Technology (SFT) for over 20 years. They are leading the charge in making Supercritical Fluids a growing part of the conversation on green chemistry. What used to be a technology intended for extractions of things like caffeine from coffee can now be applied in dozens of areas, including aerogels, metal injection molding, medical implant cleaning and artifact restoration.

Curaleaf has partnered with Applied Separation to fulfill its commitment to the medical and patient community to provide standardized dose products. Applied will supply the equipment and intellectual property necessary to perform quantitatively and qualitatively accurate extractions and infusions. Through our affiliation with Applied Separation, Curaleaf will use super critical fluid extraction and impregnation methods that revolutionize the industry. These processes allow Curaleaf to extract more active compound from the plant than the standard in the industry, meaning we require less raw material to produce our product line.

In addition we can efficiently and uniformly infuse that extract into any product, even the raw material itself, resulting in a higher concentration of medicinal product.

This process can reduce the cost of production, by requiring less plant material to create Marijuana Infused Products. In addition, in terms of raw material, the patient who is smoking as a method of consumption can smoke less product to get the desired dosage, thus reducing the effects of the products of combustion on the patient's lungs.

Renee Giroux

Renee Giroux – Organic Agricultural Production Consultant
Watertown, Connecticut

Renee Giroux has been Head Grower at Gilbertie's Herbs Gardens Inc. since 2008.

Renee is responsible for certifying the largest organic greenhouse system in New England and currently maintains the largest grow selection in the country. She is currently farming five acres of certified organic land.

She has developed biosphere growing techniques for all 20 greenhouse systems and well as developing HACCP for cut herb and vegetable production through SCS Global.

Renee has developed Proprietary fertilizers and growing plans and propagation techniques all through soilless media. She has also achieved Grants through USDA and FDA programs, as well as registered pure Organic strains of liquids for control of pests.

Curaleaf has associated Renee to develop and oversee Curaleaf's organic cultivation practices. She has also developed and will continue to modify our integrated pest management system.

Colin Coogan

Colin Coogan – Cultivation and Equipment Consultant
Stamford, Connecticut

Colin Coogan is owner and operator of CT Roots and Greenup Group.

CT Roots is Connecticut's premier indoor growing supply store and garden center. As owner and operator, Colin is well versed in all indoor gardening needs, including the latest state of the art equipment.

Green Up provides consultation, design, installation and maintenance of a variety of plant-based products and systems that showcase the aesthetic and environmental benefits of green technology

These two operations demonstrate the breadth of Colin's experience in using sustainable, green technology to achieve the best indoor grow environments possible.

Curaleaf has associated Colin as an expert in these fields, but also as a means of locally sourcing our equipment needs.

Expert Botanist and Cultivation Specialist



Jason Cranford

[REDACTED]

[REDACTED]

Objective

Expert Botanist specializing in the organic cultivation of medical grade marijuana and the development of highly medicinal marijuana infused products. Highly experienced in greenhouse and indoor cultivation with successful projects in multiple climates and elevations.

Summary of Qualifications

- 25+ years of cultivation experience working extensively with Cannabis
- Expert in extractions and infusions using a variety of solvents and delivery systems
- Licensed General Contractor for 20+ years with a comprehensive working knowledge of the intricacies of Grow Room designs and builds

Relevant Experience

- CEO / Colorado Cultivation Consultant – Biotech Inc. (2010 Present)
- Chief Botanist – KannaLife Sciences (2013 Present)
- Owner / Head Grower – Rifle Mountain, LLC (Primarily Indoor Cultivation: 2011 Present)
- Owner / Head Grower – Project Greenery, LLC (Primarily Greenhouse Cultivation: 2009 2011)
- Horticultural Greenhouse Intern - University of Georgia (1997 1999)
- Cedar Green Nurseries (1994 1997)
- Commercial Landscaping – Oliver Reality (1988 1992)

Career Highlights

- 2010 Winner of the CBD AWARD 1st Annual High Times Medical Cannabis Cup Denver, CO
- Successful 4 year breeding project that produced a 95% CBD plant verified through two separate independent labs
- Development of several CBD rich infused products including cannato™ 1:1
- Won unanimous Commissioner approval from a conservative County Planning and Commission Board to use a six acre parcel for the Greenhouse Cultivation of Medical Grade Marijuana

[REDACTED]

[REDACTED]

JOSEPH L. STEVENS

SUMMARY: Founder of first and only NJ Licensed Alternative Treatment Center providing pharmaceutical grade medicinal marijuana to qualified NJ patients.

EDUCATION AND LICENSING

ASRT #466288 ARRT #408466

NJ License #642467

2007 County College of Morris

Associate of Applied Science, Radiography

1997 Mercer Community College

Associate of Applied Science and Certificate; Funeral Services Curriculum

WORK EXPERIENCE

2011-present Greenleaf Compassion Center Montclair, NJ
President and CEO

- Established and opened first NJ Non-Profit Alternative Treatment Center to provide State-approved patients with medicinal marijuana

2007-2011 Advanced Imaging Associates Franklin, NJ
Radiological Technologist

- Perform MRI and x-ray procedures for multi-location imaging group
- CPR Certified
- PACS
- Preparing for MRI Registry

2007 Morristown Memorial Hospital Morristown, NJ
Radiological Technologist

- Perform R.T. procedures in high-volume trauma hospital
- Rotations in ER, OR, Fluoroscopy, MRI, Nuclear Medicine, Pediatrics
- CPR Certified
- PACS

1994-2003 Family-Owned Funeral Homes New Jersey
Funeral Director

- Counseled families for pre-need and post-need funeral services
- Arranged and directed funeral services
- Performed embalming or other preparations of the body according to the wishes of the survivors and the requirements of the law

Renee Giroux

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Organic Horticulturalist

Head Grower, Gilbertie's Herbs Gardens Inc. January, 2008- Present. They key instrument to certification for the Largest Organic Greenhouse system in New England and the largest Herb selection in the country. Currently Farming 5 acres of Certified acre Land and transitioning to Demeter certification. I have developed biosphere growing techniques for all 20 greenhouse systems. Developing HAACP for cut herb and vegetable Production through SCS Global. I have Developed Proprietary fertilizers and growing plans and propagation techniques all through soilless media. Achieved Grants through USDA and FDA . I have registered pure Organic strains of liquids for control of pests. Designed Water Purification Systems as well as minor mechanical problem solving and welding; i.e. repair of tractors furnaces, irrigation systems, and small engines.

Past Work History:

Sam Bridge Nursery , Greenwich, Ct. 2007- 2008: Grower Assistant for Perennial production

Ojito Farm, Alcalde, New Mexico, Lead Farmer for 50 Acre Biodynamic Farm

Flower Farm, Prospect, Ct 2002-2004-2005 2007: Head Grower, General Manager.

Education:

Naugatuck Valley Community College 2002; Horticultural Science A.S.

Pfeifer Center 2010 Biodynamic Farming Certified

USDA Holistic Management International Certified Farmer

COLIN COOGAN

PROFESSIONAL SUMMARY

Colin Coogan has spent the last 20 years creating and managing entrepreneurial efforts. His current companies, formed in late 2010, are an effort to contribute to the sustainable lifestyle movement. CT Roots focuses on hydroponic technologies and Green Up is concerned with green spaces via living walls, green roofs, organic gardening and plant based design.

The eight years prior Colin was a trader and broker on Wall Street.

Prior to that Colin had his own glass blowing companies in Eugene, OR and Mendocino, CA.

SKILLS

Organic Gardener, Hydroponics grower, Entrepreneur, self taught, certified green roof installer, strong people management skills, business savvy, concern for environment, creative thinker, problem solving, embraces new technologies, energetic

WORK HISTORY

Owner

12/2010 to Current

CT Roots LLC Green Up LLC – Stamford, CT

Owner and CEO of family business whose mission it is to improve the quality of lives by bringing together the best green organic technology and sustainable lifestyle concepts.

Trader/Broker

06/2002 to 12/2010

GFI Stock – NYC

Traded securities on Wall Street

Owner/CEO

07/1998 to 06/2002

Mendocino Art Glass Co – Mendocino CA

Glassblower in Northern California; employed 5 people; taught glassblowing to new employees.

EDUCATION

Business

University of Oregon – Eugene, OR

Business

Lane College – Eugene, OR

High School Diploma

1993

Horace Greely High School – Chappaqua, NY

Senior year worked with Environmental Action Group in NYC

Introduction

Describe any plans you have to provide a safe, healthy and economically beneficial working environment for your employees, including, but not limited to, your plans regarding workplace safety and environmental standards, codes of conduct, healthcare benefits, educational benefits, retirement benefits, and wage standards.

Location

The Curaleaf production facility is located in the former world headquarters building for Ensign Bickford Aerospace & Defense, a global leader of precision energetics systems and innovative explosive solutions. As such, the facility is equipped with eight clean rooms which were used to manufacture explosives. It is also outfitted with executive style office space and break rooms.

In addition to the inherent safety and structural integrity already a part of the building, Curaleaf will employ a myriad of physical and structural safety systems to ensure that employees are safe inside and outside the workplace. See Employee Safety section below for a full description of Employee safety and security measures.

As part of our build out, we will enhance the employee experience by implementing designs that were specifically crafted for Curaleaf by the professional artists and designers of The Guild. The Guild is a broad collection of artists, designers, architects, project managers, developers, carpenters and painters who come together to lend their talents to making dynamic environments and unique experiences. They have created environments for Nike, Christian Dior, Versace and the W Hotels to name a few.

In short, the building was built to provide a safe, healthy and aesthetically pleasing work environment.

In addition to a beautiful building, the neighborhood of the facility and the town of Simsbury as a whole offer a safe and beautiful backdrop for the employee.

Corporate Culture

One of the core values set forth in Curaleaf's mission statement will help guide the company in achieving their goal of creating a "healthy" organizational culture. A "healthy" organizational culture will increase productivity, growth, efficiency and reduce counterproductive behavior and turnover of employees. A variety of the characteristics which create a "healthy" organizational culture include:

- Acceptance and appreciation for diversity: Organizations employing a diverse workforce can supply a greater variety of solutions to problems in service, sourcing, and allocation of resources. Employees from diverse backgrounds bring individual talents and experiences in suggesting ideas that are flexible in adapting to fluctuating markets and customer demands. Curaleaf intends to employ this method in its recruiting efforts.
- Codes of Conduct: Regard for and fair treatment of each employee as well as respect for each employee's contribution to the company. Curaleaf has an employee handbook which contains policies and procedures for handling a variety of situations. In the absence of a specific situation not listed in the handbook, the management team will work to resolve the matter in the best interest of both the company and then employee.
- Employee pride and enthusiasm for the organization and the work performed. Curaleaf intends to develop a recognition program to keep its employees motivated to promote continued pride and enthusiasm.
- Equal opportunity for each employee to realize their full potential within the company. Curaleaf will establish goals for employees and conduct regular performance reviews to measure the success in reaching those goals.
- Strong communication with all employees regarding policies and company issues. All new hires will go through an on-boarding process during which they will receive a copy of the company handbook, extensive training, over-all education.
- Excellent company leadership with a strong sense of direction and purpose. Curaleaf is committed to recruiting and hiring the most knowledgeable people in their fields in an effort to move the company forward.
- Ability to compete in industry innovation. Employees will be encouraged to keep abreast of new and/or improved procedures within the industry and the company will support their efforts to bring those ideas to the table.
- Lower than average turnover rates (direct benefit of a healthy culture). Curaleaf will make every effort to recruit the best fits for each available position in addition to offering competitive wages and benefits.
- Educational Investment: Curaleaf will invest in learning, training, and employee knowledge.

Curaleaf will seek high employee involvement, strong internal communications, acceptance and encouragement of out of the box suggestions and ongoing participation in health & safety programs.

Education and Training

Effectively orienting new employees to Curaleaf and to their positions is critical to establishing successful, productive working relationships. Each employee will attend Curaleaf's New Employee Orientation.

- General Orientation
 - Curaleaf
 - Security
 - Compliance
 - Human resources/benefits

Each employee will also be required to complete their individual training plan, which will be created with the new employee. This individual training plan will outline the particular areas of expertise that the new employee will be working in.

- [REDACTED]
- [REDACTED]

Curaleaf will invest in continuing education for our employees that will be tailored to fit the individual job descriptions of the employee.

Supporting Materials: the following materials are, attached to the business plan in section C of this RFA.

- Employee Education
- Employee Training Checklist
- Employee Training Presentations
- New Employee Checklist

Use of Expert
HR Advisors

██████████ is a business and executive leadership development company that provides services designed to develop companies and the people who lead them. With over 20 years in organizational development and Human Resources, Curaleaf has contracted ██████ to develop and implement strategies that will recruit and develop key players and increase overall employee satisfaction, retention and contribution.

Individualized
Health Care Benefit
Options

Curaleaf will provide each eligible employee a very competitive defined benefit contribution for the purpose of purchasing medical, dental, along with other insurance coverage options made available with Bright Choices Exchange. Curaleaf employees will be able to access a variety of plan designs that will be more suited toward that individual employee's life stage, health status, and financial situation. For example, this program currently provides 12 medical plan options with Aetna, 4 Dental Plan options with Guardian along with Vision, Critical Illness, Life, Accident and Disability coverage. Our employee benefit program will also provide for Health & Wellness coaching along with Financial Service guidance.

Our goal is to have employees who are not only very satisfied with their coverage but have become a better informed benefit consumer. Curaleaf's defined contribution funding approach coupled with a state of the art benefit programs will provide our employees with the one of the most cost effective, comprehensive, and personalized / right sized benefit program available.

See attached individual healthcare presentation

Competitive Economic Benefits

Compensation designed to provide living wage with quality/flexible employee benefits. Curaleaf will work with [REDACTED] to accurately determine appropriate living wages for all prospective new hires. In addition, Curaleaf will provide a platform of benefits to include, but not limited to medical, dental, vision, flexible spending, 401k, life insurance, long term disability coverage, Employee Assistance Plan and an assortment of AFLAC options. Each employee will be given a company contribution (yet to be determined) with which they can purchase the benefits that are most important to them and their families.

Introduction	<p>Compassionate Need Plan: Describe any compassionate need program you intend to offer. Include in your response:</p> <ul style="list-style-type: none">• The protocols for determining which patients will qualify for the program;• The discounts available to patients eligible for the compassionate need program;• The names of any other organizations, if any, with which you intend to partner or coordinate in connection with the compassionate need program, including any dispensary facility applicant; and• Any other information you think may be helpful to the Department in evaluating your compassionate need program.
<hr/>	

Compassionate Need Plan

Overview

Curaleaf's basic charitable mission is to provide pharmaceutical grade medical cannabis to patients in need. This section briefly summarizes Curaleaf's basic approach to our charitable missions, but it should be understood that our board of directors will be refining our charitable programs on an ongoing basis in response to our experiences and evolving patient and community needs.

An important aspect of our patient care mission is our commitment to increase access to medical cannabis for those who are medically underserved. Most immediately, we recognize that people with chronic or terminal illness often have limited financial means frequently made worse by the loss of ability to work and the expenditure of income on expensive medical or custodial care. While we will continually refine the administration of the program, the financial commitment is secure and is an integral part of our pro forma.

Primary focus areas:

- Reducing the cost of our medicine and expanding our indigent care program
- Investing in our research and development program
- Developing and expanding our charitable and philanthropic programs
- Providing additional worker and patient education and training.
- Offering more free healthcare services to patients.

Financial Commitment	<p>Unlike most charitable contribution plans, Curaleaf will commit funding to the compassionate need program based on sales, rather than based on profits. We did this to ensure that the funds are available to the program and will persist into the future.</p> <p>Specifically, 1% of sales, with no cap, is budgeted to support a compassionate need program.</p>
Educate Insurance Carriers	<p>Access issues for medical cannabis are especially pronounced because cannabis is currently a self-pay medication. Neither public nor commercial insurers provide any subsidies or reimbursements to patients electing to use this medicine. With our board's experience in the health care industry, we expect to bring forth research that may persuade third-party payers to reimburse patients using medical cannabis for conditions for which it has been shown to be clinically efficacious, safe and cost effective in comparison to alternative therapies.</p>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dispensary Relationships

We intend to create partnerships with licensed dispensaries in order to collaborate in administering our compassionate need program. [REDACTED]

[REDACTED]

We expect to promote the role of the Pharmacist from the traditional role of dispenser, to the role of a pharmaceutical care provider, and that this will result in the overall reduction of healthcare costs through the reduction of polypharmacy and medication errors. Following the announcement of dispensaries who have been granted a license by the state, Curaleaf will reach out to them [REDACTED]

[REDACTED]

Compassionate Need Committee

To facilitate our interaction with charities and other organizations we have asked our current board members of charities to participate in a Charitable Research Support Committee. This Committee will be chaired by Eileen Konieczny, RN, Chief Medical Officer of Curaleaf and Board Member of the American Cannabis Nurses Association.

Eileen's history of patient care and her background as founder of the patient education organization, Olive's Branch, makes her the ideal leader for this committee. As committee chair, Eileen will forward the compassionate need program by drawing on her local network of patient support groups for qualifying conditions, charities for qualifying conditions and any other platforms that can reach the patient populations most in need of free or discounted medicine to ease their suffering. The goal of the committee is thus to create more avenues than solely the dispensaries in order to reach a wider spectrum of patients eligible for the compassionate need program.

Patient Eligibility and Discounts Available

We anticipate the ability to provide product at low or no cost to those patients with financial need. Patients will be pre-qualified for this program during an interview process using a form similar to the one below. The income levels are currently based on Federal Poverty Levels and subject to revision as new information becomes available.

For those patients with limited financial ability to purchase medical marijuana, we will offer a low-cost and a no-cost program, subject to approval. Each patient that requests participation in the low-cost or no-cost program will be required to complete the application below. Each application will be individually reviewed and acceptance will be granted on a case by case basis.

Patient Eligibility and Discounts Available

Eligibility will be determined using Federal Poverty Guidelines. Patients whose income falls below a multiple of the guideline level (multiple yet to be determined, as we will consult with local social agencies to determine the appropriate level) will be eligible to receive Curaleaf medication through a licensed dispensary at little or no cost.

2013 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA			
Persons in family/household	Poverty guideline		
1	\$11,490		
2	15,510		
3	19,530		
4	23,550		
5	27,570		
6	31,590		
7	35,610		
8	39,630		
For families/households with more than 8 persons, add \$4,020 for each additional person.			

curaleaf compassion

Curaleaf Compassion helps eligible patients without prescription coverage get savings on their Curaleaf medicines through participating dispensaries, regardless of their age or income.

Am I eligible for Curaleaf Compassion?

You and your family are eligible to receive assistance through Curaleaf Compassion if:

1. You have been prescribed Curaleaf medicine
2. You reside in Connecticut
3. You have no prescription drug coverage

How do I apply for Curaleaf Compassion?

Fill out and sign this form and mail the completed form to:
Curaleaf, 100 Grist Mill Rd. #2A, Simsbury, CT 06067

The Curaleaf Compassion savings program is not health insurance. There are no membership fees to participate in the Curaleaf Compassion program.

for a complete list of participating dispensaries please go to www.curaleaf.com. Estimated savings range from 15-36% and depend on such factors as the particular drug purchased, amount purchased, and the dispensary where purchased.

1	Name	Date of Birth	Gender
	Applicant:	__/__/__	<input type="checkbox"/> M <input type="checkbox"/> F
	Spouse/Domestic Partner:	__/__/__	<input type="checkbox"/> M <input type="checkbox"/> F
	Dependent #1:	__/__/__	<input type="checkbox"/> M <input type="checkbox"/> F
	Dependent #2:	__/__/__	<input type="checkbox"/> M <input type="checkbox"/> F
	Address:		
	City:	State:	Zipcode:
	Telephone: (____) ____-____	Email Address:	

2	Total Gross Annual Income: \$ _____ (to determine savings level)	Number of Persons in Household: _____ (include yourself and those you are financially responsible for)
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3 **Patient Privacy and consent:** The information you provide will be used by Curaleaf, the Curaleaf Patient Assistance Foundation and parties acting on their behalf to determine eligibility, to manage and improve Curaleaf Helpful Answers (PHA) programs, products and services, to communicate with you about your experience with PHA and Curaleaf Compassion, and/or to send you materials and other helpful information and updates relating to PHA programs.

Patient declaration – By signing below, I/we affirm that my/our answers are complete, true and accurate to the best of my/our knowledge. And I/we understand and attest that:

- Completing this application form does not ensure that I/we will qualify for Pfizer Pfriends.
- Curaleaf may verify the accuracy of the information I/we have provided and may ask for more financial and insurance information.
 - Any medications purchased at a discount price through Curaleaf shall not be sold, traded, bartered or transferred.
 - Curaleaf reserves the right to change or cancel the Curaleaf Compassion program at any time.
 - I/we will promptly contact Curaleaf if my/our financial status or insurance coverage changes.

Original Applicant Signature:	X	__/__/__
Original Spouse/Domestic Partner Signature:	X	__/__/__
Original Dependent #1 Signature: (Parent or guardian, if under 18 years of age)	X	__/__/__
Original Dependent #2 Signature: (Parent or guardian, if under 18 years of age)	X	__/__/__

Introduction	<p>Provide the Department with a detailed proposal to conduct, or facilitate, a scientific study or studies related to the medicinal use of marijuana. To the extent it has been determined, include in your proposal, a detailed description of each</p> <ul style="list-style-type: none">• The methodology of the study• The issue(s) you intend to study;• The method you will use to identify and select study participants;• The identify of all persons or organizations you intend to work with in connection with the study, including the role of each;• The duration of the study; and• The intended use of the study results.
Financial Commitment	Curaleaf will dedicate 2% of sales, up to \$100,000 per year, to research.

Curaleaf Research
Associate Jahan Marcu

Curaleaf is working with Jahan Marcu who has created a research plan for our organization.

Jahan Marcu, Ph.D., is the Vice-Chair of the Americans for Safe Access Multidisciplinary Scientific Advisory Board. Dr. Marcu is currently investigating the pharmacology of cannabinoid receptors at Temple University. He received his Ph.D. for studying the CB1 receptor, and the role of the endocannabinoid system in bone. Dr. Marcu is also court qualified cannabis and synthetic cannabinoid expert and received the Cannabis Researcher of the Year award for 2012.

Dr. Marcu is currently the Vice-Chair of the Americans for Safe Access Multidisciplinary Scientific Advisory Board, and blogs about cannabinoids at the Philadelphia Examiner.

Before earning his Ph.D., Dr. Marcu worked at the California Pacific Medical Center Research Institute studying the anti-cancer properties of compounds from the cannabis plant. The findings were published in the Journal of Molecular Cancer Therapeutics.

Dr. Marcu is one of the few people in the world who holds the title of “Master of Cannabis” , which he received after accepting an invitation to complete a Master-class on cannabis, in Holland at the Universities of Leiden and Wageningen.

Dr. Marcu effectively translates complex scientific concepts to a lay audience and is developing international networks of key cannabis researchers. He has served as a volunteer for Americans for Safe Access (ASA) since 2003 and is currently the vice-chair the ASA Medical and Scientific Advisory Board.

Dr. Marcu has lectured on the subject of cannabinoid science at Universities, medical cannabis cooperatives, libraries, and high schools. Dr. Marcu is a contributing author and editor of numerous online publications including: projectCBD.org, O’Shaughnessy’s: The Journal Of Cannabis In Clinical Practice (beyondthc.com), and the sensible science blog at freedomisgreen.com.

Dr. Marcu is also a court qualified cannabis and synthetic cannabinoid expert.

A recent scientific publication can be found here:

<http://www.ncbi.nlm.nih.gov/pubmed/22421596>

A recent interview can be found here:

http://www.philly.com/phillynews/Synthetic_pot_its_not_Designer_drug_ban_brings_unintended_consequences_.html

A recent science presentation at a conference can be found here:

<http://www.youtube.com/watch?v=8Tg4zrWBw2g>

Research Plan

Specific Aim 1: [REDACTED]

Specific Aim 2: [REDACTED]

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Introduction

Provide the Department with a detailed description of any plans you have to give back to the community either at a state or local level if awarded a producer license.

1% of sales, up to \$100,000 annually, will be granted to programs that benefit the local community. April Arrasate, our COO and a local resident, will assemble and chair a Community Benefits Committee that will help Curaleaf understand and address the local and state priorities. Grants will be made at least annually.

Curaleaf will reach out to the following community stakeholders:

- Elected and appointed government officials.
- Religious leaders.
- Health care providers.
- Education providers.

Ms. Arrasate has reached out to several members of the community and has secured commitments.

Lesa Peters, Chair of the woodbury Democratic Town Committee

*See attached resume

Beth Levesque, RN, Oncology Nurse

With input from stakeholders, Curaleaf will seek to make annual grants to local organizations that, in our opinion, will make the most effective use of the grant to benefit an underserved population or the community as a whole.

Grant recipients will be expected to:

- Provide a description of how the grant will be used.
- State the objectives of the program
- Report at least annually on the actual results achieved
- Provide copies of any filings required to be made to state and/or federal agencies
- Permit an audit if Curaleaf so desires.

Introduction

Lesa C. Peters



Employment Experience

Select Business Solutions

February 2006 - present

Senior Customer Support Manager

Trumbull CT

- Provide technical support to Fortune 200 customers in the U.S., Europe and Japan, including large global financial institutions, consumer product companies, Federal and State government agencies, and major hospitals.
- Prioritize customer issues and escalate issues to Development and senior management as needed.
- Coordinate support efforts with Sales personnel, to ensure evaluations become purchases, and to maintain customer satisfaction.
- Assist with QA of new releases, with an emphasis on installation and configuration testing and review of documentation.
- Provide 24*7 support for installation, upgrade, and production down issues.

Aonix Corporation

January 1997 - February 2006

Customer Support Manager

Trumbull CT

- Organized and managed coverage for Y2K, which resulted in minimal customer issues because of proactive approach.
- Implemented use of pagers to replace answering service for 24*7 coverage, providing better flexibility for responding to production down issues.
- Provided technical support to customers and technical expertise to other members of the support team.

Thomson Software Products

July 1987 - January 1997

Support Team Leader

Norwalk CT

- Functioned as the primary support backup for support consultants located in the Redwood City, CA office.
- Provided technical and support procedures training for new employees, and new feature/new product training.
- Wrote and delivered technical training sessions at annual users conferences.
- Attended customer conference in London (UK), and made onsite visits to customers in England.
- Provided onsite training for a new release, for multiple customers in Toronto, Chicago, and Springfield, IL.

Dun & Bradstreet Computing Services

January 1985 - January 1987

Support Consultant

Wilton CT

- Provided technical support to customers, including installation issues and product functionality, reproduce symptoms and submit reports to Development for resolution, send patches (product changes) to customers, and ensure patches are installed and resolve the issue.

Introduction

- Reviewed and wrote release notes for new versions, providing the fixed problems list delivered to customers with the release.

National CSS/D&B Computing Services **1982 - 1984**
Technical Representative/Software Consultant **Stamford CT**

- Provided technical expertise to time-sharing clients, demo'ed products to prospects, provided technical training, assisted with debugging applications, and wrote application enhancements, as a member of a team of Tech Reps responsible for the time-sharing clients. Technical assistance was provided via phone calls, during onsite visits to customers, and when assisting customers who came into the office.
- Provided technical expertise on sales calls as a member of a team selling the DBMS/4GL product (NOMAD) for sites to install on their z/VM and z/OS mainframe. Provided installation and configuration assistance during software trials and post-sales technical support to customers.

Warner Computer Systems **1981 - 1982**
Technical Analyst **New York NY**

- Provided financial data and IT consulting to banks, brokerage firms, investment advisors, utilizing daily stock databases and Standard & Poor's Compustat database.
- Implemented and documented customer requests, assisted Sales with demonstrations, produced graphics of stock market information.

City University of New York **1977 - 1981**
Data Analyst/Research Assistant **New York NY**

- Maintained and analyzed student data for the 170,000 attendees at the largest urban university system in the U.S.
- Supervised collection of freshman placement records for 40,000 applicants.
- Developed a database of test results to facilitate research on the effectiveness of remedial programs and student retention rates.
- Attended policy advisory meetings and established data collection procedures as liaison to the IT and Admissions Departments of the 18 colleges and the Department of Academic Affairs.

Company Awards

Select Business Solutions, President's Council Award-Ebis Division, 2003

Aonix, President's Council Award-U.S., 2001

Aonix, Top Support Team member, 1999

Thomson Software Products, Most Valuable Player, May 1994, assisted with close of \$250,000 new business

Additional Accomplishments

- Ella Grasso Award, CT Democratic Party, 2009
- Woodbury-Bethlehem Community Music Foundation, Secretary (2006:present)
- Woodbury Democratic Town Committee, Chair (2006:present), Secretary (2004:2006)
- Mt. Kisco (NY) Day Care, Board member and Secretary (1992:1995)

Education

M.A., Demography/Sociology, Brown University, Teaching Assistant

B.A., Sociology, Connecticut College, Cum Laude

Introduction

Provide a detailed description of any plans you will undertake, if awarded a producer license, to combat substance abuse in Connecticut, including the extent to which you will partner, or otherwise work, with existing substance abuse programs.

Financial Commitment	One percent of sales, up to \$100,000 annually to be put toward education, programs and groups that work to prevent substance abuse in Connecticut, as directed by the Curaleaf committee on substance abuse prevention.
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Substance Abuse Prevention Committee	<p>Curaleaf will create a Substance Abuse Prevention Committee that will help Curaleaf to identify recipients and ensure the money is effectively spent on worthwhile programs. The program will be chaired by Mary Lynn Mathre RN, MSN, CARN. Ms. Mathre is a Certified Addiction Registered Nurse who has provided consultation to hospitals, clinics, health care organizations related to prevention, assessment and treatment of substance abuse/addiction. Mary Lynn is also a member of the Curaleaf Advisory Board.</p> <p>The goal of the Committee will be to assist our local communities on the issue of substance abuse and prevention. We would like to partner with organizations within our local communities who are already involved in these efforts and assist them in helping people understand drugs, medicines and their potential for abuse. We will assist by funding existing programs as well as launch a substance abuse prevention campaign that specifically targets our most vulnerable citizens, those under 18 years of age.</p>
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Substance Abuse Prevention Campaign

The committee's substance abuse prevention campaign will consist of an educational program. One component of the campaign will aim to deter the recreational use of illicit drugs and pharmaceuticals among minors by:

- explaining the damaging effects of illicit drugs and pharmaceuticals on the developing brain,
- reiterating that the legalization of marijuana as a pharmaceutical does not indicate that it is a safe recreational drug for minors.

Method

- Identifies the specific substance abuse and other child and adolescent problems in a community;
- Measure the nature and extent of substance abuse patterns and trends;
- collect data on risk and protective factors throughout the community
- Consult with key community leaders to understand the community culture.
- Consult resources such as public access questionnaires and existing community-level data (e.g., truancy records, substance arrest records, emergency room admissions data).
- Identify prevention efforts already under way to address the problem.
- Build on existing resources (e.g., current substance abuse prevention programs;
- Develops short-term goals related to selecting and carrying out education based prevention programs and strategies;
- Projects long-term goals so that plans and resources are available for the future; and
- Includes on-going assessments of the prevention program.

Affiliation with a
Substance Abuse
Recovery Center

Curaleaf will also partner with a specific substance abuse treatment center as a resource for patients who require assistance or information regarding addiction and drug dependence. In our educational efforts, we will include this facility's materials and do our best to facilitate patient, physician and pharmacist access to the facility as a resource.

We are currently in talks with two facilities regarding this program;

Introduction

Describe any efforts you will take to reduce the ecological footprint of your production facility and other business operations such as plans to use renewable energy sources.

Curaleaf will focus on sustainability in all areas of operation. Curaleaf will maintain strict compliance with state environmental regulations, including but not limited to;

- Recycling policies
- Garbage collection requirement
- Hazardous waste policies

"Fitting Out" an Existing Building

Curaleaf has secured a building that is uniquely suited to the requirements of a marijuana producing operation. The facility is the former world headquarters of Ensign Bickford Aerospace & Defense, a global leader of precision energetics systems and innovative explosive solutions. The high tech production and security requirements of that business translate into a well equipped structure for the manufacture of medical marijuana. The Simsbury facility is exactly the right size to support our first two phases of production; it has installed clean room technology that can be re-commissioned and put to service quickly and effectively; it has extensive power and HVAC systems, industrial chillers and an inherently secure design and location. The building layout and height is well suited; and its excess parking area (see item 2 below) is ideally situated and oriented to support a potential phase three development of a solar powered greenhouse growing operation. All of this can be achieved with a minimum amount of remodeling waste generation or disruption of the established neighborhood.

Maximize the Use of Direct Sunlight in a Secure, Naturally Illuminated Production Facility

The northern portion of the building is most suited to creating a naturally illuminated growing space because the roof is lower over that area, and it is out beyond the shadowing of the higher portion of the roof to the south. It is anticipated that the 12 hour growing cycle for the flowering phase best matches the daylight availability, particularly during spring and summer. Putting the most intensive (Flowering Room) growing under natural light for the summer will greatly diminish the huge internal heat gain caused by artificial lighting during that period when the excess heat is unable to be diverted to space or ventilation air heating. It will also reduce the electric power demand during the period of peak utility demand. Curaleaf has also explored the possibility of a potential phase three development of a solar powered greenhouse growing operation as the site has an ideal location for such a structure.

The existing flat roof replaced with vaulted skylight assemblies — either butted tight for a full coverage or spaced for partial coverage. Each assembly has a mechanized black shade built in.

Where Artificial Lighting is Used, Make this the Most Efficient and Effective Technology Available.

- We are not aware of any more efficient or effective lighting choices than the high-pressure sodium for the flower room (at 130 – 150 lumens per watt), or high output linear fluorescent fixtures in the Veg and Mother rooms (at 110 – 120 lumens per watt).
- For the T5 linear fluorescent lamps, use the ultra low mercury products such as those produced by Phillips.
- LED lighting shows promise, but is not yet at a stage where it can outperform these currently conventional light sources.
- But to make sure that the production processes are keeping up with the rapid advances in lighting technology — particularly in LED and induction lighting, we will dedicate a portion of the growing area for research and development of growing practices using these cutting edge technologies and when we have understood their full potential and how to maximize their growing potential we will progressively upgrade our production lighting

Ventilation

Reduce ventilation requirement by:

- Throughout the year introducing in-building CO₂ generating composting operations to reduce the nominal 12 ACH requirement to maintain sufficient CO₂ concentration.
At periods of maximum “bio-climatic stress” using imported bottled CO₂ operation to reduce or eliminate the need for flushing in exterior air when the outdoor air is either too cold for the waste heat from the lighting to sufficiently temper the in-coming air, or too humid for the enthalpic recovery to reduce humidity to a production-optimal level.

Improve ventilation effectiveness:

- Use point source extraction from enclosing hoods above the pair of lights at each grow table.
- Reorganize (or replace) the ventilation ducting to created a “displacement” ventilation mode of operation. Cool outdoor air is introduced at floor level and the exhaust is removed via a ceiling plenum — this is a development of the above strategy.

Find the Highest and Best Use for Excess Heat from the Artificial Lighting

There will be approximately 2.03 Million Btu/hr of internal heat gain from the grow lighting in the three growing areas — averaged across a 24 hour period.

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

Cooling Strategies

[Redacted]

Northeast Utilities

[Redacted]

Pv's For On-Site Generation Of Electricity	<p>A portion of the existing roof is not optimal for PV production — the roof plane itself is at two levels with the higher plane to the south shading portion of the lower plane to the north. The result is that approximately 20+% of the roof is shaded beyond what would be acceptable for a PV installation. This leaves roughly 30,000 sq. ft. of roof plane suitably irradiated. The area required to generate sufficient electricity to cover the entire annual electrical requirement would be approximately — (producing 500,000 kWh per year at 15W per sq. ft. each installed watt generating 1.2 kWh per year) — 28,000 sq. ft. which is a close match to the useful roof area available.</p>
Rainwater Collection	<p>Rainwater has a more desirable chemistry for growing than does the treated water from the municipal source, so there is some incentive to collect rainwater harvested from the roof. On a flat roofed building such as the Ensign Bickford building collection is easy — it simply requires tapping one or more of the internal rainwater leader pipes that pass down through the building interior. Rainwater would flow by gravity to a cistern (approximately 5,000 gallons) located on a reinforced concrete pad over the existing slab inside the building. There would be modest filtration after a “first flush” diversion to jettison leaf debris and coarse particulates. Overflow can be directed to the small irrigation demand of the landscape immediately adjacent to the building. This system would reduce the draw from municipal water to a very small demand level — really only potable water is for the bathrooms, showers, and kitchenette. Again this collection process helps to reduce the carbon footprint of the entire operation as well as reduce storm water runoff.</p>

Waste Management Any growing medium used in the facility will be composted and reused after assessment of what is needed to bring it up to standard. This process will be outlined by our Equipment and Green Strategies consultant Colin Coogan of CT Roots and GreenUp Group.

Hazardous Waste Management and Spill Procedures Curaleaf has employed a lab safety expert to create a manual, attached hereto, which addresses many issues which safeguard the environment, including but not limited to;

- Limiting the use of unsafe chemicals or conditions
- Chemical spill prevention measures and procedures
- Hazardous material management
- Environmental regulations and procedures specific to the chemicals and materials that will be used.

Local Sourcing To further sustainability and a lesser carbon footprint, [REDACTED] [REDACTED] will be the primary source of equipment, nutrients, and growing media. In addition, CT Roots will source locally, whenever possible.

Green Strategies Consultant Colin Coogan is the equipment and green strategies consultant for Curaleaf. He has advised Curaleaf on all of our decisions regarding equipment in order to ensure that we have the latest state of the art technologies and he has reviewed our cultivation protocols and procedures to ensure that they are environmentally as friendly as possible.

Integrated Pest Management Curaleaf has implemented an Integrated Pest Management System, described in detail in our Best Practices and Procedures Manual, that makes full use of environmentally sound control methods which reduces chances of environmental contamination and worker health problems.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Organic Farming

The impact of organic agriculture on natural resources favors interactions within the agro-ecosystem that are vital for both agricultural production and nature conservation. Ecological services derived include soil forming and conditioning, soil stabilization, waste recycling, carbon sequestration, nutrients cycling, predation, pollination and habitats. By opting for organic farming it promotes a less polluting agricultural system. The hidden costs of agriculture to the environment in terms of natural resource degradation are reduced.

Organic agriculture considers the medium- and long-term effect of agricultural interventions on the agro-ecosystem. Organic agriculture takes a proactive approach as opposed to treating problems after they emerge.

- Reduces chance of pests developing resistance
- Potential energy savings, in the manufacturing and application of pesticides
- Reduced pesticide application could avoid problems with soil
- Compaction from pesticide application equipment
- Makes full use of environmentally sound control methods, which reduces
- Chances of environmental contamination and worker health problems
- Allows grower to determine seriousness of problem and to take action when they deem necessary
- Develops a greater understanding of pests and their control by the grower
- Allows the grower to modify their pest management program to meet their
- Specific needs

Soil Differences

Chemical FarmingWhat is it?

Cultivation and production (Nutrient, pest & disease management) of crops by inorganic chemical inputs

Against Nature

In chemically managed soil, the plant nutrients are supplied only through inorganic source, without any organic carbon source to derive food. This ultimately deprives the soil-eco system of the growth medium

Blocks The Microbial Activity

Due to the absence of carbon source, microbial population trends to be less or sometimes NIL in soil

Soil structure is destroyed

Non-availability of binding material of the soil particles result in disintegration and reduce the soil granulation. In the long run it may reduce the productive capacity of land to harbor the crops & become unfit for production

Soil becomes dead

While chemical farming satisfies only the crop nutrient requirements, it is not conducive for biological environment of the soil, finally resulting in a problematic soil loaded with inorganic salts

Alters the soil pH

Continuous use of inorganic chemicals leads to changes in the pH of the soil (either acidic or saline depending on the type of fertilizer used). It unbalances the nutrient availability status and in some cases creates toxicity to the plants

Organic FarmingWhat is it?

Cultivation and production (Nutrient, pest & disease management) of crops by biodegradable organic inputs

Harmony with nature

In an organic management, the focus is on food web relations and element cycling aiming to maximize the agro-ecosystem's stability, sustainability and homeostasis (balanced equilibrium)

Increases The Microbial Life

Organics is the main source for nutrients. The soil microbes derive the food from the carbonaceous source and multiply and make the soil lively, also decomposing the complex organic compounds present in the added organics

Soil structure improves

Stable organic resins (humus) resulting from organic residue decomposition imparts stability to soil aggregates and corrects the permeability i.e., crumb like structure. This structure facilitates to improve soil aeration, water holding capacity, root penetration, while reducing the soil erosion by aggregation of soil particles

Soils become fertile

Here the biological property of the soil is improved by addition of organic manure. Intensive biological activity promotes better symbiotic relationship between plant and the soil focusing on sustainable plant production and nutrient management.

Buffering of soils (Enables neutral pH)

Presence of colloidal matter improves the buffering capacity of the soil and Cation Exchanging Capacity. It regulates the nutrient availability due to buffering action, besides checking the toxicity levels to plants and soil microbes

Soil Differences
(continued)Nutrients are available only for shorter period

Certain fertilizers in the absence of microbes permanently fix on to the soil particles and may not be available for plant root absorption. In addition, the chemical fertilizers are easily water soluble and this may lead to various types of losses through leaching, evaporation, etc.

Leads to erosion

Absence of binding agents (organic substances) between soil particles makes the soil particles to be easily detached by water and wind. It leads to loss of top fertile soils ultimately making the land barren and unfit for farming/cultivation

Accumulation of hazardous material in soil

Over and abuse of chemical fertilizers (nitrate) & pesticides harm the biological life of the soil. The residues such as heavy metals present in the inorganic soils may pose serious health hazards. Excessive nutrient & salt application such as nitrate, causes ground water pollution, & may be linked to certain diseases in human beings

Nutrients available for longer period

Microbes decompose the complex organic compounds to mineral components and CO₂. Further the mineral elements are converted in to available plant nutrients through mineralization process. These ions are held by organic matter and soil colloids and are slowly released as nutrients over a longer period.

Prevents the soil erosion

Organic soil management techniques such as organic fertilization, mulching and cover cropping increases aggregation (by organic acid), improves soil structure and therefore increase the soil's water infiltration and retention capacity, substantially reducing the risk of erosion

There is no hazardous material in soil

It doesn't leave any residues/ hazardous material in the soil since all input is biodegradable & non-toxic

Crop Differences

Quick lodging of crop

Most of the nutrient is leached beyond the root zone and the crop might lose much of the needed nutrient for better root anchor. Similarly chemically managed soil doesn't provide much of the structure support to the crops. The combination of above leads to lodging of crop

Provide good anchorage to the crop

Physical (structure), chemical (nutrients transformation and mineralization) and biological activity (decomposition) favors the crop stand and growth. 'Liveliness' of soil provides a good growth media and support to crop growth

More chemical residues present in crops

For managing fertility, pest and diseases large quantity of synthetic chemicals are used in crops. It does not metabolize properly and leaves residues as such in the end product. It will reduce the quality of product and can turn into poison for consumption

No chemical residues present in crop

Only decomposable materials (organic manure and biocontrol agent) are used. It does not leave any harmful residue in the crop or the soil environment

Crops are highly susceptible to pests and diseases

Crops are in fleshy condition naturally inviting pest and diseases. A chemically grown crop does not have much resistance power against pest and diseases because of less cell wall thickness & low calcium and potassium absorption by plants

Protects from pests and diseases

Availability of much of calcium and potassium in organically managed soils improves the uptake in crops. It provides the natural resistance to crops against pest and diseases.

Harvested produce are in low quality

The conversion of source to sink, non availability of nutrients especially potassium reduce the quality of the product.

Premium quality

nutrients availability in entire crop growth period, increases up taking capacity and proper conversion of source to sink improves the keeping quality especially of fruits and vegetables

Health/Social Differences

Cause pollution to the environment

Chemically managed soils release the residues in soil and water environment leads to pollution. sometimes it causes toxic effect to human environment

Provide chemical mixed /toxic food to the human life

Inorganic fertilizers (nitrogen) and pesticide (synthetic compound) does not decompose properly and leave residues in plant parts, when used as feed material for animal and food for human beings may create a diseases, and malformations

Causes inborn disease to the human beings

Presence of toxic substance in food materials alters the genetic characteristics of human beings. this genetic mutation cause several in borne disease to human beings

Pollution free approach

All practices are interrelated and the end product will be decomposable one. so there is no cause for environmental pollution

Provide nutritive food to the human life

In organic farming, ideal combination of agronomical, physical and biological measures bring down the population harmful microbes and do not release any residues in soil and crop environment. The plant parts from organically managed soils are intuitively rich and safe

It provides the immune power to the human beings

Crops are grown under balanced nutritive approach. Crop uptake nutrients as and when required in entire growing period and convert the absorbed nutrients properly in to sink. when the food material from organically managed soils are consumed, natural immunity of the human beings is developed.

Economic Differences

High investments in inputs

Inorganic input materials are costly and require much technical knowledge and investment to produce and handle

Highly fluctuation in yield

Fertilizer managed soil does not provide nutrient properly during the entire crop duration. The deficiency of one essential nutrient directly effects the growth and metabolism and act antagonistic to other nutrient absorption by crop resulting in fluctuation and loss in yield

Low investments in inputs material

Organic input materials are less costly source, readily available at the door step & very easy to apply.

Satisfactory and reliable yield

The nutrients are available in entire crop period in balanced way. It provides optimal environment to the crop growth and taps the full genetic potential of crops to provide satisfactory level yield and quality

thank you

curaleaf