



November 15<sup>th</sup>, 2013

Department of Consumer Protection  
165 Capitol Avenue  
Hartford, Connecticut 06106-1630  
(860) 713-6100

To Whom It May Concern:

Greenbelt Management is pleased to present to you our application to become one of three initial Licensed Producers in the State of Connecticut for medical marijuana cultivation. We are excited at the opportunity to apply for this license, which is governed by Connecticut General Statutes, Chapter 420f, Section 21a-408 and the Department of Consumer Protection's Proposed Revised Regulation Concerning Palliative Use of Marijuana. We look forward to positively engaging local and state officials in our effort to become Connecticut's most compliant and secure production facility, with a vision of producing affordable, consistent and safe medicine for qualifying patients in the state.

As principals of C.H. Nickerson and Company, our Producer Backers will employ the same business strategies that have helped establish one of New England's oldest operating general contracting firms. Understanding the need to comply with the 180-day deadline to begin operations, we feel extremely comfortable in our ability to manage the design and construction processes efficiently for a speedy approval. With experience complying with a myriad of safety and building codes and managing up to 250 employees at any given time for CH Nickerson, we are more than capable of managing personnel and operating in this strict regulatory environment.

We fully understand the challenges in front of us to not only design, construct and operate such a facility, but do so in a manner that progresses the industry forward with respect to the perception of marijuana as a medicine, our ability to integrate into our community, our desire for robust science based research and assisting in the development of technological and operational efficiencies in an effort to help create responsible industry standards. Because of this we have hired Denver Relief Consulting, highly regarded as one of the top marijuana cultivators, processors and retailers in the country, to assist us in the navigation of this endeavor. Although not a partner in the company, Denver Relief Consulting has committed to stand beside us as an advisor and consultant for no less than three years, or until we have achieved a level of ultimate autonomy.

If Greenbelt Management is awarded a license to produce, we believe we will be the first in the country to cultivate legal medical marijuana in a municipality owned building, as the city of Middletown has approved us for a tenancy after a vote from City Council and strong support from the Mayor and members of the community. We believe this is a strong indication of our commitment to be collaborators and transparent about our intentions as we usher this industry out of the shadows and into relevancy in Connecticut.

Please let us know if you have any questions and we look forward to hearing your decision.

Sincerely,



Jason Nickerson



# Medical Marijuana Program

165 Capitol Avenue, Room 145, Hartford, CT 06106-1630 • (860) 713-6066

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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: Greenbelt Management,						
3. Trade Name of Applicant: Greenbelt Management						
4. Applicant's Business Address: 1189 Post Road, Suite 3A						
5. City: Fairfield				6. State: CT	7. Zip Code: 06824	
8. Daytime Telephone Number: 860.489.0455			9. E-mail Address: jason@greenbeltmgmt.com			
10. Applicant's Mailing Address (if different than business address):					11. City:	
12. State:	13. Zip Code:	14. Daytime Telephone Number:		15. Fax Number:		

### 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: Jason M. Nickerson	17. Primary Contact Title: Member
18. Primary Contact E-mail Address: jason@greenbeltmgmt.com	19. Primary Contact Telephone Number: 860.489.0455
20. OPTIONAL - Name of Alternate Contact: Matthew Nickerson	21. Alternate Contact Title: Member
22. Alternate Contact E-mail Address: matt@greenbeltmgmt.com	23. Alternate Contact Telephone Number:

### Section C: Formation/Incorporation Information

24. Date of Formation/Incorporation: 12/21/2012	25. Place of Formation/Incorporation: Fairfield, CT
26. Registered with the Connecticut Secretary of State: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	27. Sale and Use Tax Permit Number: 13W9900826006  Provide a copy of your Sale and Use Tax permit with your application.



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## Section D: Proposed Production Facility Information

28. Proposed Production Facility Address: 180 Johnson Street			29. City: Middletown
30. State: CT	31. Zip Code: 06457	32. Telephone Number: TBD	33. Fax Number: TBD
34. Own or Lease Property: <input type="checkbox"/> Own <input checked="" type="checkbox"/> Lease <b>Provide a copy of the lease, deed or other documents evidencing the right to occupy if you are awarded a license.</b>		35. Name of Property Owner: City of Middletown	

## 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 checked="" type="checkbox"/> No If yes, provide the name of all applicants with whom you are associated. Attach additional pages if necessary.	
37. Applicant Name:	38. Applicant Type: <input 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:		
43. Address:		
44. City:	45. State:	46. Zip Code:
47. Telephone Number:	48. Fax Number:	49. E-mail Address:

## 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:



# MEDICAL MARIJUANA PROGRAM

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## Section H: Proposed Production Facility Business Hours

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

Monday	7am _____ to _____	7pm _____	Friday	7am _____ to _____	7pm _____
Tuesday	7am _____ to _____	7pm _____	Saturday	7am _____ to _____	7pm _____
Wednesday	7am _____ to _____	7pm _____	Sunday	7am _____ to _____	7pm _____
Thursday	7am _____ to _____	7pm _____			

## 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: Greenbelt Management, LLC	61. Time Period: 12/21/2012 - Present
Greenbelt	12/21/2012 - Present

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: Jason Michael Nickerson	65. Percentage of ownership ■
Matthew Alexander Nickerson	■



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## 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:
Jason, Michael, Nickerson	Member/C.O.O.	General Management/C.O.O.
Matthew, Alexander, Nickerson	Member	General Management
Kayvan, Tyler, Khalatbari	Consultant	Operational Consultant
Jill, Lamoureux	Consultant	Best Practice Consultant
Nick, Adam, Hice	Consultant	Cultivation Consultant

## 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:
Legal - Gaffney Bennett	\$ 58,742	Jason and Matthew Nickerson
Denver Relief Consulting	\$ 125,000.00	Jason and Matthew Nickerson
Lease option City of Middletown	\$ 25,000.00	Jason and Matthew Nickerson
Architecture and Engineering	\$ 25,600	Jason and Matthew Nickerson
	\$	
	\$	
	\$	



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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: Kratos HBE Public Safety and Security Solutions, Inc.			
73. Primary Security Company Address (including Apartment or Suite #): 3 Tower office Park			74. City: Woburn
75. State: MA	76. Zip Code: 01801	77. Telephone Number: (781) 932-1780	78. Fax Number: (781) 932-1901
79. E-mail Address: ty.miller@kratos-hbe.com			
80. Backup Security Company Name: Canna Security America			
81. Backup Security Company Address (including Apartment or Suite #): 4704 Harlan St. Suite 520			82. City: Denver
83. State: CO	84. Zip Code: 80212	85. Telephone Number: (888) 929-4272	86. Fax Number: (720) 269-1410
87. E-mail Address: info@cannasecurity.com			
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?  Yes  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?  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.**

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?  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.**

92. Has the applicant 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.**



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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:

[Redacted Signature]

95. Date Signed:

11/14/13

## 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. As the duly authorized representative of the applicant, I hereby make the above certifications on behalf of the applicant.

96. Signature:

[Redacted Signature]

97. Date Signed:

11/14/13



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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: Jason Michael Nickerson						
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: jason@greenbelmgmt.com	

#### 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:

- 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:

11/14/13

## 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:

11/14/13



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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): Jason, Michael, Nickerson			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]	
6. Title: General Manager/C.O.O.	7. Telephone Number: [REDACTED]	8. E-mail Address: jason@greenbeltmgmt.com	
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: C.H. Nickerson and Company, Inc.		13. Date of Employment: Start Date: 4/23/2007 End Date: :
14. Employer Address (including Apartment or Suite #): 49 Hayden Hill Road		
15. City: Torrington	16. State: CT	17. Zip Code: 06790
18. Daytime Telephone Number: 860.489.0455	19. Fax Number: 860.496.0483	20. E-mail Address: amachen@chnickerson.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"> <li>• The business name;</li> <li>• Products or services offered;</li> <li>• The business location;</li> <li>• All titles and responsibilities held by you at the business, including the time frame for each;</li> <li>• The dates of your association with the business;</li> <li>• Whether you currently have a role at the business and, if not, when your involvement terminated and why; and</li> <li>• 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.</li> </ul>



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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:

11/14/17

## 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:



[Redacted Signature]

42. Date Signed:

11/14/17



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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): Jason, Michael, Nickerson			
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: jason@greenbeltingmt.com	

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
<b>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.</b>

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: 11/14/13

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: 11/14/13



# 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 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: Matthew Alexander Nickerson						
3. Trade Name of Backer (if applicable):						
4. Street Address (including Apartment or Suite #): ██████████						
5. City: ██████████				6. State: ██████	7. Zip Code: ████████	
8. Daytime Telephone Number: ██████████		9. Fax Number:			10. E-mail Address: matt@greenbeltmgmt.com	

#### 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:

- 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): Exp █	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:

11/14/13

## 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:

11/14/13



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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): Matthew Alexander Nickerson			
2. Street Address (including Apartment or Suite #): [REDACTED]			
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: General Manager & CFO		7. Telephone Number: [REDACTED]	8. E-mail Address: matt@greenbeltmgmt.com
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: Massey Knakal Realty Services		13. Date of Employment: Start Date: 05/23/2011 End Date: :	
14. Employer Address (including Apartment or Suite #): 275 Madison Avenue, suite 3A			
15. City: New York		16. State: NY	17. Zip Code: 10016
18. Daytime Telephone Number: (212) 696-2500	19. Fax Number:	20. E-mail Address: jn@masseyknakal.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"> <li>• The business name;</li> <li>• Products or services offered;</li> <li>• The business location;</li> <li>• All titles and responsibilities held by you at the business, including the time frame for each;</li> <li>• The dates of your association with the business;</li> <li>• Whether you currently have a role at the business and, if not, when your involvement terminated and why; and</li> <li>• 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.</li> </ul>



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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. [Redacted]	28. Type:	29. Number:
[Redacted]	[Redacted]	[Redacted]	[Redacted]
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:

11/14/13

### 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:

11/14/13



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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): Matthew Alexander Nickerson		
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: matt@greenbeltmgmt.com

#### 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?  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 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: 11/14/13
--------------------------------	------------------------------

**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: 11/14/13
--------------------------------	------------------------------



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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): Kayvan Tyler Khalatbari				
2. Street Address (including Apartment or Suite #): [REDACTED]				
3. City: [REDACTED]		4. State: [REDACTED]	5. Zip Code: [REDACTED]	
6. Title: Operations Consultant		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: Self Employed at Denver Relief and Denver Relief Consulting		13. Date of Employment: Start Date: 05/03/2009 End Date: :
14. Employer Address (including Apartment or Suite #): 1 Broadway A200		
15. City: Denver		16. State: CO
18. Daytime Telephone Number: (303) 420-7526		17. Zip Code: 80203
19. Fax Number: (720) 836-3177		20. E-mail Address: info@denverreliefconsulting.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"> <li>• The business name;</li> <li>• Products or services offered;</li> <li>• The business location;</li> <li>• All titles and responsibilities held by you at the business, including the time frame for each;</li> <li>• The dates of your association with the business;</li> <li>• Whether you currently have a role at the business and, if not, when your involvement terminated and why; and</li> <li>• 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.</li> </ul>



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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): ██████████	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:

11/14/2013

### 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.

41. Signature:



[Redacted Signature]

42. Date Signed:

11/14/2013





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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):

2. Street Address (including Apartment or Suite #):

3. City:

4. State:

5. Zip Code:

6. Title:

7. Telephone Number:

E-mail Address:

9. Date of Birth:

10. Social Number:

11. Gender:

Male  Female

#### Section B: Employment Information

12. Current or Most Recent Employer:

13. Date of Employment:

Start Date: "

End Date: :

14. Employer Address (including Apartment or Suite #):

15. City:

16. State:

17. Zip Code:

18. Daytime Telephone Number:

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?

Yes  No

22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country?

Yes  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:

- 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. [REDACTED]	28. Type:	29. Number:
30. State	31. Issue Date (month/year): Expiration [REDACTED] (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:

11/14/2013

**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.

41. Signature:

42. Date Signed:

11/14/2013



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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): Nicholas Adam Hice		
2. Street Address (including Apartment or Suite #): [REDACTED]		
3. City: [REDACTED]	4. State: [REDACTED]	5. Zip Code: [REDACTED]
6. Title: Cultivation Consultant	7. Telephone Number: [REDACTED]	8. E-mail Address: <a href="mailto:nick@denverrelief.com">nick@denverrelief.com</a>
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: Denver Relief Consulting		13. Date of Employment: Start Date: 07/01/2012 End Date: :	
14. Employer Address (including Apartment or Suite #): 1 Broadway #A-205			
15. City: Denver		16. State: Co	17. Zip Code: 80203
18. Daytime Telephone Number: (303) 907-7731	19. Fax Number:	20. E-mail Address: <a href="mailto:nick@denverrelief.com">nick@denverrelief.com</a>	

### 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?

Yes  No

22. Other than the applicant, are you currently associated with a marijuana or agriculture business in any state or country?

Yes  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:

- 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.



# Medical Marijuana Program

165 Capitol Avenue, Room 145, Hartford, CT 06106-1630 • (860) 713-6066

E-mail: [dcp.mmp@ct.gov](mailto:dcp.mmp@ct.gov) • Website: [www.ct.gov/dcp/mmp](http://www.ct.gov/dcp/mmp)



## 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.



# Medical Marijuana Program

165 Capitol Avenue, Room 145, Hartford, CT 06106-1630 • (860) 713-6066

E-mail: [dcp.mmp@ct.gov](mailto:dcp.mmp@ct.gov) • Website: [www.ct.gov/dcp/mmp](http://www.ct.gov/dcp/mmp)



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:

11/14/13

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:



[Redacted Signature]

42. Date Signed:

11/14/13



## Temporary Permit for Sales and Use Tax

Do **NOT** mail to the Department of Revenue Services

**This temporary permit must be displayed for customers to see and is not assignable or transferable.**

**Confirmation  
Number\*:**



**Organization  
Name:**

Greenbelt Management LLC

**Business Trade  
Name:**

Greenbelt Management LLC

**Business  
Address:**

1189 Post Road  
Suite 3A  
Fairfield, CT 068244

**This temporary permit will expire on 12/02/2013.**

\* This number will act as your temporary tax registration number. It will be replaced when you receive your registration confirmation package in the mail.

Your registration package will include information on electronic options available in our Taxpayer Service Center (TSC). In a separate envelope, you will also be receiving a personal identification number (PIN) which will allow you access to the TSC. Once you receive your PIN, we encourage you to take advantage of our electronic services.

registration confirmation package by the 15th business day following completion of REG-1 OL.



LEASE OPTION / LEASE AGREEMENT

BETWEEN

THE CITY OF MIDDLETOWN

AND

Greenbelt Management, LLC

This LEASE OPTION / LEASE AGREEMENT, hereinafter referred to as the LEASE, and made as of the 4th day of October 2013, by and between the City of Middletown, with its offices located at 245 deKoven Drive, , Middletown, Connecticut 06457, hereinafter referred to as the LANDLORD, and Greenbelt Management, LLC with its offices located at 1189 Post Road, Suite 3A, Fairfield CT, 06824 hereinafter referred to as the TENANT.

ARTICLE I

Basic Data; Definitions

Section 1.1

The following sets forth basic data, hereinafter referred to in this LEASE, and, where appropriate, constitute definitions of the terms hereinafter listed.

- (a) TENANT: Shall mean Greenbelt Management, LLC, and shall include all of its officers, employees, managers, members, directors, and shareholders, and any other party having an ownership or investment interest in the LLC.
- (b) Present Mailing Address of TENANT: 1189 Post Road, Suite 3A, Fairfield CT, 06824
- (c) The Demised Premises: the Demised Premises contains 15,000 rentable square feet located on the 2<sup>nd</sup> floor of Building A. See Attached Exhibit A for specific locations of space.
- (d) Lease Term: Five (5) Years, with an option to extend for an additional five (5) year term, provided all rent and utility payments are current. Three (3) percent annual rent increase shall continue over the course of the second five (5) year term.
- (e) Commencement Date: The LEASE shall commence on the 1<sup>st</sup> of the month immediately following the date of issuance of a license to Greenbelt Management for the production of medicinal marijuana by the State of Connecticut Department of Consumer Protection. Such license shall be secured on or before July 31<sup>st</sup>, 2014. Failure to secure said license shall render this LEASE null and void.
- (f) Rental Rate: Rent shall be due on the first day of each month subject to a ten (10) grace period. The TENANT shall be obligated to pay rent in accordance with the following schedule:

<u>Year</u>	<u>Gross Rent</u> (Per Sq. Ft. Per Year)	<u>Monthly Gross Rent</u>	
1	\$4.00	\$5000.00	
2	\$4.12	\$5,150.00	
3	\$4.24	\$5,300.00	
4	\$4.36	\$5,450.00	
5	\$4.49	\$5,612.00	

\*\*\* First and last months rent due upon the date of issuance of a license to Greenbelt Management for the production of medicinal marijuana by the State of Connecticut Department of Consumer Protection.

- (g) Option to Lease – Upon execution of this LEASE and to secure exclusive right to said space prior to a license being issued from State of Connecticut Department of Consumer Protection the tenant will provide a non-refundable \$25,000 payment. The payment is non-refundable regardless of issuance or denial of license and available immediately to the landlord upon payment.
- (h) Use; Office/Warehouse/Production of medical marijuana in accordance with all laws and regulations of the State of Connecticut, shown on Exhibit B, which has been attached hereto. .
- (i) Utilities / Operating Expenses: Routine exterior maintenance expenses are included in the rental rates. TENANT shall pay for its own electric, gas, water, cable, internet HVAC and any other utility via direct meter to the leased space.
- (j) LANDLORD shall be fully responsible for all maintenance and repairs to the roof at the LANDLORD’s sole cost and expense.
- (k) In recognition of the tenants improvements to the property, the first twelve (12) months shall be free rent.

ARTICLE II  
PREMISES

Section. 2.1 – Description of Premises.

LANDLORD hereby Leases to TENANT and TENANT hereby Leases from LANDLORD, upon and subject to the terms and provisions of this LEASE, the premises, hereinafter referred to as the Demised Premises, as defined in Section 1.1 (c) herein and shown on Exhibit A, which has been attached hereto and incorporated herein as if more fully set forth herein.

Section. 2.2 – LANDLORD’S Reservations.

Excepting and reserving to the LANDLORD the roof and exterior walls of the building of which the Demised Premises are a part; and further reserving to the LANDLORD the right to

place in the Demised Premises, in such manner as to reduce to a minimum the interference with the TENANT'S use of the Demised Premises, utility lines, pipes and the like, to serve premises other than the Demised Premises, and to replace and maintain and repair such utility lines, pipes and the like in, over and upon the Demised Premises as may have been installed in said building.

### ARTICLE III

#### Security

Section 3.1 – Security. TENANT shall implement and use, at all times 24 hours a day 7 days a week, the security measures outlined in the attached Security and Transportation Plan and any additional requirements presented to and included in the State of Connecticut Department of Consumer Protection license requirements. Any alterations to the Security and Transportation Plan shall require the prior written consent of LANDLORD, which consent shall not be unreasonably withheld.

Section 3.2 – Approval from local Police Chief. All plans and specifications and security measures, including but not limited to cameras, lighting, alarms, access controls etc., will be reviewed and approved by the City of Middletown Chief of Police or his designee prior to certificate of occupancy.

Section 3.3 – Perimeter Cameras – the tenant shall install, monitor and maintain, at their sole cost, security cameras as required per the DCP license as they are delineated at time of lease execution, including, but not limited to, cameras around the exterior of the entire Demised Premises. All data and images collected from the perimeter cameras shall be available at all times and in real time to the landlord and local police department for criminal investigations.

### ARTICLE IV

#### Use of Premises and Federal Intervention

##### Section 4.1 – Permitted Use.

It is understood, and the TENANT so agrees, that the Demised Premises during the Term of this LEASE and any authorized extensions of the LEASE shall be used and occupied by the TENANT only for the purposes specified as the use thereof in Section 1.1(h) of this LEASE , hereinabove, and for no other purpose or purposes. At all times the tenant shall maintain a valid license from the State of Connecticut Department of consumer Protection for the production of medical marijuana.

Section 4.2 Federal or State Intervention – Should the TENANT receive any type of cease and desist order, letter, or other communication from any state or federal authority the TENANT shall immediately cease operation and comply in every way with said order. Once in compliance with any federal or state mandates, TENANT is free to recommence operations. Said order, letter, or other communication and mandatory compliance therewith shall in no way release the tenant from the terms of this lease and shall remain fully responsible for all rent due and utility payments.

Section 4.3 – Operational Covenants.

The TENANT further agrees to conform to all of the following provisions during the entire Term of this LEASE:

Prior to execution of the LEASE, the TENANT shall provide the LANDLORD with its articles of organization and a complete list of all of its officers, employees, members, managers, shareholders, and any other party having an ownership or investment interest in Greenbelt Management LLC. TENANT shall always conduct its operations in the Demised Premises under its present trade name unless the LANDLORD shall otherwise consent in writing. TENANT shall require LANDLORD'S prior written consent for any change in the majority ownership of Greenbelt Management LLC. Majority Ownership shall be defined as at least 51% (FIFTY-ONE PERCENT) ownership rights or greater. LANDLORD agrees to provide written consent of new ownership within 30 calendar days of TENANT'S submission, otherwise ownership transferred is automatically deemed acceptable by LANDLORD. Throughout the term of the Lease, TENANT shall remain in compliance with the current DCP regulations, specifically as it pertains to notification of change in ownership

- (b) No auction, fire or bankruptcy sales may be conducted within the Demised Premises without the prior written consent of the LANDLORD; The TENANT shall not use the areas or grounds adjacent to the Demised Premises for business purposes including but not limited to the distribution of handbills or advertising of any type without the prior written consent of the LANDLORD.
- (c) The TENANT shall load, unload, receive and ship goods within a totally enclosed building only in the manner, at such times, and in such areas, as may be designated by the LANDLORD or otherwise agreed upon by LANDLORD. All trash, refuse and the like shall be kept in such areas as designated by the LANDLORD.
- (d) The TENANT shall not perform any act or carry on any practice which may injure the Demised Premises or any other part of the LANDLORD'S Premises of which the Demised Premises are a part or cause anything beyond reasonable odor or loud noise associated with an office/production/warehouse use or constitute a nuisance or menace to any other occupants or other persons in the Premises, and in no event shall any loud noises or offensive odors be emitted from the Demised Premises.
- (f) The TENANT agrees that it and any of its invitees and all others connected with the TENANT'S operations at the Demised Premises will abide by all of the reasonable rules and regulations from time to time established by the LANDLORD.
- (i) The TENANT shall, in performing its obligations hereunder, comply with all applicable laws, ordinances, rules and regulations from time to time applicable to the Demised Premises and the business conducted therein by the TENANT, including but not limited to, obtaining and maintaining any and all permits necessary and proper in order to construct improvements and permit the TENANT to use the Demised Premises for the purpose set forth in Section 1.1 (h)

ARTICLE V  
TENANTs Maintenance, Alterations and Improvements

Section 5.1 – TENANT Repair Obligations.

Except as specifically provided herein, the TENANT agrees that from and after the date that the possession of the Demised Premises is delivered to the TENANT and continuously throughout the Lease Term, the TENANT will keep neat and clean and maintain in good order, condition and repair, the Demised Premises and every part thereof. The TENANT further agrees that the Demised Premises shall be kept in a clean, sanitary and safe condition and shall in all respects comply with laws of the State and the ordinances of the City of Middletown and in accordance with all directions, rules and regulations of the Health Officer, Fire Marshal, Building Inspector and all other proper officers of the governmental agencies having jurisdiction over the Demised Premises.

Section 5.2 – TENANT’S Alterations and Improvements.

The TENANT shall not make any alterations, improvements and/or additions to the Demised Premises without first obtaining, in each instance, the prior written consent of the LANDLORD, which consent shall not be unreasonably withheld. LANDLORD agrees in advance to all alterations necessary by tenant to renovate and improve the facility as set forth in the attached document, Exhibit C. TENANT shall also obtain a building permit and any other applicable construction permits, LANDLORD shall fully cooperate in assisting and expediting the TENANT in connection with obtaining all necessary and required permits, certificates of occupancy or certificates of completion from the City of Middletown Building Department. LANDLORD shall fully cooperate and coordinate with the TENANT in obtaining access to the entire building, including those spaces presently occupied by other Tenants.

By executing this LEASE tenant covenants that it has sufficient funds on hand to undertake tenant alterations as displayed in Exhibit D. Exhibit E is proof of sufficient funds in the form of a \$60,000 letter of credit or certified bank check to the city of Middletown. Failure to complete tenant alterations as displayed in Exhibit C, within one year of issuance of a production license from Department of Consumer Protection, shall be a default of said LEASE and landlord shall have all remedies as detailed in Section 8.4 of this LEASE and shall have immediate access to said Letter of Credit to complete necessary and unfinished improvements to the space Once substantial completion and Certificates of Occupancy are issued for the demised space, LANDLORD shall immediately return to TENANT any monies being held for purposes of this section.

TENANT will use properly licensed contractors to remove or properly encapsulate all lead and asbestos containing materials from the demised space and render said space fully lead safe in accordance with CT Department of Public Health guidelines.

If existing windows are not going to be replaced tenant shall enclose in a manner similar (T 111 painted white on exterior) to other portions of the building.

## ARTICLE VI

### TENANT's Use and Occupancy at its own Risk

The TENANT agrees to use and occupy the Demised Premises and to use such other portions of the Premises as it is herein given the right to use at its own risk. The LANDLORD shall have no responsibility or liability for any loss or damage to the TENANT'S Leasehold improvements or to fixtures or any other personal property of the TENANT or those claiming by, through or under the TENANT. The provisions of this Section shall apply during the entire Lease Term and during any earlier period that the LANDLORD has given prior written permission to the TENANT to enter the Demised Premises.

## ARTICLE VII

### Indemnification

#### Section 6.1 – Indemnification.

The TENANT shall at all times during the Term of this LEASE, from and after the date possession of the Demised Premises is delivered to the TENANT, hold the LANDLORD, its officers, agents, servants and employees harmless and indemnified against any loss, damage, cost, expense or liability resulting to any person or property by reason of any act or thing done or omitted to be done in, upon or about the Demised Premises or any part thereof, unless such loss, damage, cost, expense or liability shall be caused by the negligence of the LANDLORD and the TENANT shall hold the LANDLORD, its officers, agents, servants and employees indemnified and free and clear of any and all claims, demands, penalties, liabilities, judgments, costs and expenses, including but not limited to reasonable attorney's fees, arising in connection with the use of the site, Demised Premises by the TENANT or his employees, agents, guests, visitors, or invitees. For the purposes of this Section, the Demised Premises shall include the service areas adjoining the same and any sidewalk adjacent to the Demised Premises. This indemnification shall survive the termination of this Lease and shall include indemnity against all costs, expenses and liabilities incurred in connection with any claim or proceeding and the defense thereof, including but not limited to reasonable attorney's fees and court costs.

## ARTICLE VII

### LANDLORD'S Access to Premises

#### Section 7.1 – Right of Entry.

Notwithstanding anything contained herein, LANDLORD and its designees agree that all access shall be subject to approval by the Department of Consumer Protection of the State of Connecticut and that LANDLORD and its designees shall have no right to enter upon the Demised Premises, without being in full compliance with the Department of Consumer Protection of the State of Connecticut and the requirements and regulations of Exhibit B. TENANT shall fully cooperate in connection with all necessary access by LANDLORD and its designees. LANDLORD and its designees shall have the right to enter upon the Demised Premises for non-emergency repairs or for the purpose of inspecting, subject to approval by the

Department of Consumer Protection of the State of Connecticut The LANDLORD and its designees shall have the right to enter upon the Demised Premises at any time in the case of an emergency. If repairs are required to be made by the TENANT pursuant to the terms of this LEASE or if the TENANT is required to perform any other obligation under this LEASE, the LANDLORD may demand that the TENANT make such repairs or perform such obligation forthwith. If the TENANT refuses or neglects to commence such repairs or perform and complete the same with reasonable dispatch, after such demand, the LANDLORD may, but is not required so to do, make or cause such repairs or performance to be done and shall not be responsible to the TENANT for any loss and/or damage that may accrue as a result thereof. If the LANDLORD makes or causes such repairs or performance to be done, or endeavors so to do, the TENANT agrees that he will forthwith, on demand, pay to the LANDLORD the cost thus incurred, and if the TENANT shall be in default of such payment, then the LANDLORD shall have its remedies provided herein.

ARTICLE VIII  
Miscellaneous Provisions

Sec. 8.1 – Insurance.

TENANT, shall at its expense during the term hereof, maintain and deliver to LANDLORD, via a Certificate of Insurance form, the following coverage with respect to the Demised Premises:

- Public Liability and Property Damage Insurance in the amount of \$1,000,000 for injury or death to any one person and \$1,000,000 for any one accident, and \$500,000 for damage to property. Said policy shall name the LANDLORD as additional insured and shall provide for at least thirty (30) days prior notice of cancellation to the LANDLORD.
- Property Insurance on an all-risk basis in an amount equal to one-hundred percent (100%) of the replacement cost value of the improvements and betterments and contents.
- Fire Legal Liability in the amount of \$1,000,000.
- Workers' Compensation Insurance, including Employer's Liability, with limits of \$100,000 Each Accident, \$500,000 Disease, Policy Limit, and \$100,000 Disease, Each Employee.
- Business Interruption Insurance in an amount sufficient to protect TENANT from discontinuance based on the federal or state intervention in Section 4.2.

TENANT further agrees, in the event of any loss, to waive all rights of subrogation against the LANDLORD.

8.2 Notices. Notices to be given by one party to the other under this LEASE shall be in writing, mailed or delivered as follows:

If to the LANDLORD, City of Middletown

245 deKoven Dr.  
Middletown, CT 06457  
Attn: William Warner

If to the TENANT, Greenbelt Management LLC,  
1189 Post Road, Suite 3A  
Fairfield CT, 06824  
ATTN: Jason Nickerson

Mailed notice shall be sent by United States Certified or Registered Mail, postage prepaid. Such notices shall have been deemed to have been given when mailed.

### 8.3 Condemnation

If all or any part of the Demised Premises is taken by eminent domain, this LEASE shall expire on the date of such taking, and the rent shall be apportioned as of that date. No part of any such award shall belong to TENANT.

### 8.4 LANDLORDS Rights upon Default

In the event of any breach of this LEASE by the TENANT, which shall not have been cured within TEN (10) DAYS, then the LANDLORD, besides other rights or remedies it may have, shall have immediate right of reentry and may remove all persons and property from the Leased Premises pursuant to the summary process laws of the State of Connecticut; such property may be removed and stored in a public warehouse or elsewhere at the cost of, and for the account of, the TENANT. If the LANDLORD elects to reenter as herein provided, or should it take possession pursuant to any notice provided for by law, it may either terminate this LEASE or may, from time to time, without terminating this LEASE, relet the Demised Premises or any part thereof, for such term or terms and at such rental or rentals and upon such other terms and conditions as the LANDLORD in LANDLORD's own discretion may deem advisable. Should rentals received from such reletting during any month be less than that agreed to be paid during the month by the TENANT hereunder, the TENANT shall pay such deficiency to the LANDLORD monthly. The TENANT shall also pay to the LANDLORD, as soon as ascertained, the cost and expenses incurred by the LANDLORD, including reasonable attorney's fees, relating to such reletting.

### 8.5 Quiet Enjoyment

The LANDLORD agrees that if the TENANT shall pay the rent as aforesaid and perform the covenants and agreements herein contained on its part to be performed, the TENANT shall peaceably hold and enjoy the said rented premises without hindrance or interruption by the LANDLORD or by any other person or persons acting under or through the LANDLORD.

### 8.6 Surrender upon Termination.

At the end of the Lease term the TENANT shall surrender the Demised Premises in as good condition as it was in at the beginning of the term, reasonable use and wear excepted.

### 8.7 Subordination



This LEASE and the TENANT's Leasehold interest, is and shall be subordinate, subject and inferior to any and all liens and encumbrances now and thereafter placed on the Demised Premises and all advances paid under such liens and encumbrances.

8.8 Holdover

No receipt of money by the LANDLORD from the TENANT after the termination of this LEASE, the service of any notice, the commencement of any suit or final judgment for possession shall reinstate, continue or extend the term of this LEASE or affect any such notice, demand, suit or judgment.

8.9 Waiver.

No waiver of default of the TENANT shall be implied and no express waiver shall affect any default other than the default specified in such waiver and that only for the time and to the extent therein stated. The invalidity or unenforceability of any provision of this LEASE shall not affect or impair any other provision.

8.10 Exclusivity of Remedies.

All rights and remedies of the LANDLORD and the TENANT under this LEASE shall be cumulative and none shall exclude any other rights and remedies allowed by law or statute.

8.11 Provisions Binding.

Each of the provisions of this LEASE shall extend to and shall, as the case may require, bind or inure to the benefit, not only of the LANDLORD and of the TENANT, but also of their respective heirs, legal representatives, successors and permitted assigns, provided this clause shall not permit any assignment contrary to the provisions of 8.16 hereof.

8.12 Entire Agreement.

All of the representations and obligations of the LANDLORD and the TENANT are contained herein and no modification, waiver or amendment of this LEASE, or any of its conditions or provisions, shall be binding upon the LANDLORD and the TENANT unless in writing, signed by the LANDLORD and the TENANT.

8.13 Installments of Rent.

The receipt by the LANDLORD of any installment of the Gross Rent shall not be a waiver of any other rental payments then due or of any default of the TENANT hereunder.

8.14 No Brokerage.

The TENANT warrants and represents that he has dealt with no broker in connection with the consummation of this LEASE, and in the event of any brokerage claims against the LANDLORD predicated upon prior dealings with the TENANT named herein, the TENANT agrees to defend the same and indemnify the LANDLORD against any such claim.

8.15 Recording of Lease

At the request of either party, LANDLORD and TENANT shall execute a Notice of Lease in a form prescribed by Section 47-19 of the Connecticut General Statutes for the purpose of giving record notice of the appropriate provisions of this LEASE.

8.16 Assignment

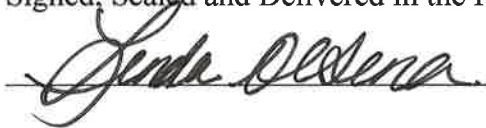
This LEASE shall not be assigned to any other party without written approval from the landlord.

8.17 Local Hiring Preference

The tenant shall work with the Middlesex County Chamber of Commerce and the North End Action Team in the recruitment of new employees. The tenant shall use its best efforts to give first and higher consideration to Middletown residents.

IN WITNESS WHEREOF, the parties have hereunto caused to be set their respective hands and seals on this \_\_\_\_\_ day of \_\_\_\_\_.

Signed, Sealed and Delivered in the Presence of:



LANDLORD, CITY OF MIDDLETOWN



Daniel T. Drew, Its Mayor,  
Duly Authorized

Date: 10/01/12



TENANT, Greenbelt Management, LLC

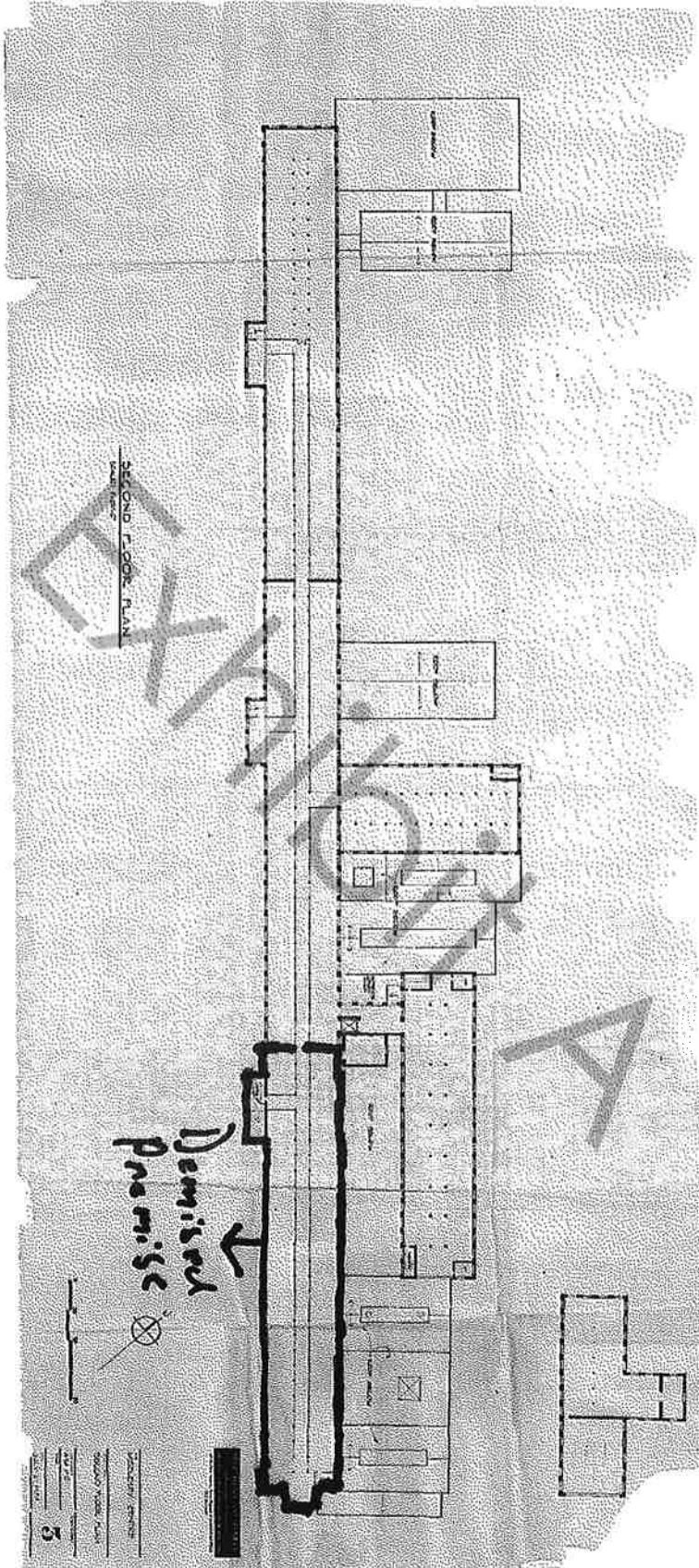


Jason Nickerson  
Duly Authorized

Date: 10/4/2013

# EXHIBIT A

10/11/13



15,000 Rentable

STATE OF CONNECTICUT  
REGULATION  
of the  
DEPARTMENT OF CONSUMER PROTECTION  
concerning  
PALLIATIVE USE OF MARIJUANA

The Regulations of Connecticut State Agencies are amended by adding sections 21a-408-1 to 21a-408-70, inclusive, as follows:

**(NEW) Sec. 21a-408-1. Definitions**

As used in sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies:

(1) "Abuse of drugs" means the use of controlled substances solely for their stimulant, depressant or hallucinogenic effect upon the higher functions of the central nervous system and not as a therapeutic agent prescribed in the course of medical treatment or in a program of research operated under the direction of a physician or pharmacologist;

(2) "Act" means Sections 21a-408 to 21a-408q, inclusive, of the Connecticut General Statutes;

(3) "Administer" means the direct application of marijuana to the body of a qualifying patient by inhalation, ingestion or any other means;

(4) "Adulterated" has the same meaning as described in section 21a-105 of the Connecticut General Statutes;

(5) "Advertisement" means all representations disseminated in any manner or by any means, other than by labeling, for the purpose of inducing, or which are likely to induce, directly or indirectly, the purchase of marijuana;

(6) "Agent" means an authorized person who acts on behalf of or at the direction of another person. It does not include a common or contract carrier, public warehouseman, or employee of the carrier or warehouseman;

(7) "Approved safe" has the same meaning as described in section 21a-262-1 of the Regulations of Connecticut State Agencies;

(8) "Approved vault" has the same meaning as described in section 21a-262-1 of the Regulations of Connecticut State Agencies;

(9) "Batch" means a specific harvest of marijuana or marijuana products that are identifiable by a batch number, every portion or package of which is uniform within recognized tolerances for the factors that were subject to a laboratory test and that appear in the labeling;

(10) "Board" means the Board of Physicians appointed under the provisions of section 21a-408l of the Connecticut General Statutes;



## City of Middletown

DEPARTMENT OF PLANNING, CONSERVATION & DEVELOPMENT  
245 deKoven Drive Middletown, CT 06457

Department of Consumer Protection  
State of Connecticut

To Whom It May Concern:

Please be advised that on October 4th, 2013, after obtaining approval from the Middletown Common Council and the Planning and Zoning Commission, Greenbelt Management, LLC (hereafter referred to as the tenant) entered into a lease option agreement with the City of Middletown (hereafter referred to as the "landlord") which grants the tenant right to execute a five year lease for 15,000 square feet of space in the city owned Remington Rand Building at 180 Johnston Street, Middletown, CT 06457. The potential also exists for tenant to increase the leased area by another 15,000 square feet within the existing building, subject to Landlord and City Council approval. Execution of the lease is contingent upon receiving a medical marijuana production license from the State Department of Consumer Protection. The terms of the lease make provision for the landlord's access to the tenant's premises to be restricted to whatever extent necessary to allow for the tenant to remain in compliance with the regulations set forth by your department pertaining to medical marijuana production facilities. Should the tenant obtain a license from your department and execute the lease, the tenant will have the landlord's express consent to develop and operate a compliant medical marijuana production facility on the leased premises.

Sincerely

A handwritten signature in black ink, appearing to read "William Warner", is written over a white background.

William Warner, AICP  
Director of Planning and Development

## Protection of Proprietary Information Request

Greenbelt Management, LLC respectfully requests the information contained in the following pages titled as, Exhibit A.A.F.41. – Evidence of Escrow, be given protection from Freedom of Information Act requests as it contains proprietary information. In particular, this section contains information regarding personal and company finances, which we believe to be personal and confidential.

The information contained in this bid for licensure by the Department of Consumer Protection is not subject to Freedom of Information Act requests pursuant to C.G.S. Section 1-210(b)(24), which exempts as follows:

“(24) Responses to any request for proposals or bid solicitation issued by a public agency or any record or file made by a public agency in connection with the contract award process, until such contract is executed or negotiations for the award of such contract have ended, whichever occurs earlier, provided the chief executive officer of such public agency certifies that the public interest in the disclosure of such responses, record or file is outweighed by the public interest in the confidentiality of such responses, record or file;”

In addition to the general exemption found in C.G.S. Section 1-210(b)(24), this information is also exempt from the Connecticut Freedom Of Information Act pursuant to C.G.S. Section 1-210(b)(8).

# O'Connell, Pace, & Company, P.C.

CERTIFIED PUBLIC ACCOUNTANTS

FACSIMILE: (860) 549-1804  
E-MAIL: [occonnells@opccpa.com](mailto:occonnells@opccpa.com)

609 FARMINGTON AVENUE  
SUITE 201  
HARTFORD, CT 06105-3063  
(860) 247-3917

Walter F. O'Connell, C.P.A.  
Mario Pace, C.P.A.  
Albert Celentano, C.P.A.  
William Clark, C.P.A., M.S.P.A.

November 11, 2013

To Whom It May Concern:

I am the independent auditor for CH Nickerson and Company, Inc. (hereinafter referred to as "our client"). Our client has consented to our provision of this requested information.

In the event that Greenbelt Management, LLC, is granted a license to produce medical marijuana, CH Nickerson and Company, Inc. has adequate liquid funds which will be made available in the form of loans, stock transfers, and/or equity distributions to its shareholders. The shareholders intend to make those funds available to Greenbelt Management, LLC in order to satisfy the escrow requirement.

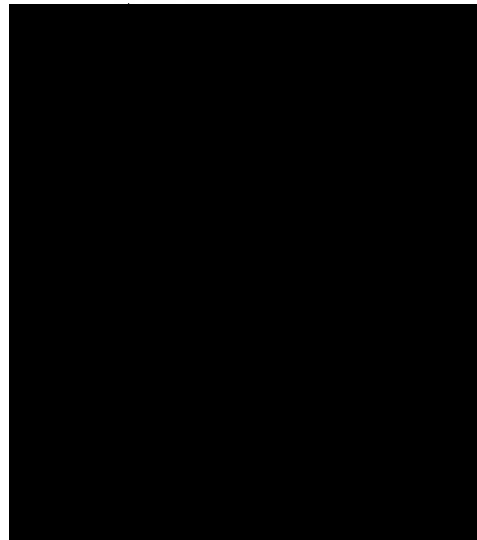
A condensed balance sheet for C. H. Nickerson and Company, Inc. at June 30, 2013 is as follows:

Current assets  
Property and equipment, net  
Other assets  
Total assets

Current liabilities  
Long-term liabilities  
Total liabilities

Stockholders' equity

Total liabilities and  
stockholder's equity



During the application process, we will be available upon request to provide any additional documentation to the Department.

By providing you with this letter, we have not established with you any direct or indirect client, contractual or quasi-contractual relationship. We do not understand or anticipate that you or any third party will rely on the information contained in this letter as a basis for entering into or continuing any contractual or other relationship with Greenbelt Management, LLC. We fully expect that before you or any third party decides to enter into any such relationship with Greenbelt Management, LLC, that you and/or that third party will exercise an appropriate level of independent due diligence. Accordingly, and use of this information is solely your responsibility and judgment.

**CONFIDENTIAL**

By accepting this letter, you acknowledge all of the above, and also that we are under no obligation to provide you or any third party with any additional information at any time, including but not limited to any changes or corrections to any of the information we have provided in this letter concerning our client.

Sincerely,



William Clark  
Certified Public Accountant



## Sec. 21a-408-62 Compliance Summary Response

The following outlines the measures that will be taken with regard to the Greenbelt Management production facility, which shall have an adequate security system to prevent and detect diversion, theft or loss of marijuana utilizing commercial grade equipment. This response is provided to satisfy the requirements of Section M: Security System in Appendix A of the application. All items within this description have been specified and quoted by Kratos HBE Public Safety and Security Solutions, Inc., as evidenced in our exhibits.

1. An alarm detection system shall be installed and shall include alarm notification upon unlawful physical breach via forced entry or motion detection. The production facility shall carry an alarm permit with the City to automatically voice dial law enforcement through a U.L. listed central monitoring system upon any alarm of the detection system. The system shall be required to send a test signal to the central monitoring system once every 24 hours to ensure functionality and the system shall be tested annually by a qualified alarm vendor in its entirety. All registered persons working on-site shall be required to wear a panic button on their person at all times, which will initiate an audible alarm signal generated by the manual activation of the device intended to signal a life threatening or emergency situation requiring the response of law enforcement.
2. Motion detection sensors tied into the alarm detection system shall be located in all entry vestibules and restricted access areas for entry detection during alarm detection system activation.
3. 100% of the floor area, with the exception of bathroom and locker rooms, shall be covered by the surveillance system, as well as all entry and exit points. All cameras shall be appropriate for the lighting levels of the area they are installed in for the capture of clear and certain identification of any person entering or exiting the facility.
4. Twenty-four hour recordings from all video cameras, which the facility shall make available for immediate viewing by the commissioner or the commissioner's authorized representative upon request and shall retain for at least thirty days. If Greenbelt is aware of a pending criminal, civil or administrative investigation or legal proceeding for which a recording may contain relevant information, the Greenbelt shall retain an unaltered copy of the recording until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the production facility manager that it is not necessary to retain the recording.
5. A duress alarm shall activate a silent security alarm system signal generated by the entry of a designated code into an arming station in order to signal that the alarm user is being forced to turn off the system.
6. A holdup alarm shall activate a silent security alarm system signal generated by the activation of a panic button, which all employees shall be required to wear at all times while at the production facility.

7. An automatic voice dialer with cellular backup shall be installed, which shall send a prerecorded voice message, when activated, over a telephone line to the Middletown Police Department, requesting dispatch.
8. A failure notification system that provides an audible, text and visual notification of any failure in the surveillance system shall be employed. The failure notification system shall provide an alert to the producer within five minutes of the failure.
9. A printer capable of clearly printing 9600 dpi from any camera image shall be integrated with the surveillance system and shall be available to print any image retained by the security system, live or recorded.
10. A date and time stamp shall be embedded on all recordings. The date and time shall be synchronized and set correctly and shall not significantly obscure the picture.
11. The security system shall be provided with an uninterrupted power system that shall allow the system to remain operational for 8 hours in the event of a power outage.
12. The security system DVR shall be located in a lock box bolted to the structure in a room that shall only be accessible by key personnel via biometric access. The access to this room shall be limited to key personnel essential to surveillance operations, law enforcement agencies, security system service employees, the commissioner or the commissioner's authorized representative, and others when approved by the commissioner. This room shall not be used for any other functions. Greenbelt shall make available a current list of authorized employees and service employees that have access to the surveillance room to the commissioner or the commissioner's authorized representative upon request.
13. In addition to the primary alarm detection system, the production facility shall employ a backup alarm detection system approved by the Commissioner that shall detect unauthorized entry during times when no employees are present at the facility and that shall be provided by a company supplying commercial grade equipment, which shall not be the same company supplying the primary security system.
14. A security standard light level of at least 0.2fc shall be maintained for all exterior spaces adjacent to production facility.
15. All video recording will allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video will have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video will also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. Greenbelt shall erase all recordings prior to disposal or sale of the facility.
16. Greenbelt shall keep all security equipment in good working order and shall test such equipment quarterly.



# RAND BUILDING A MIDDLETOWN, CT

DRAWING PREPARED BY:



17-01 POLLITT DRIVE  
FAIR LAWN, NJ 07410  
201-794-6500 \* FAX 201-794-8341  
(c) Copyright 2013 KRATOS PSS  
All Rights Reserved.

MUST BE SIGNED BY KRATOS PSS  
TO AUTHENTICATE CONTENT(S)  
ALL DETAILS CHECKED FOR ACCURACY.

TITLE \_\_\_\_\_  
SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_  
PRINT NAME \_\_\_\_\_  
KRATOS PSS JOB # \_\_\_\_\_

**CONFIDENTIAL**  
THE INFORMATION CONTAINED HEREIN MAY  
NOT BE USED OR REPRODUCED IN ANY  
MANNER WITHOUT WRITTEN PERMISSION OF  
KRATOS PSS

**PRELIMINARY DRAFT**

REV. \_\_\_\_\_ DESCRIPTION \_\_\_\_\_  
CUSTOMER: \_\_\_\_\_



PROJECT:  
**RAND BUILDING A  
MIDDLETOWN, CT**

DRAWING TITLE:  
**GENERAL NOTES**

DATE DRN 16/14/13 DATE CHK 11/17/13  
R. CRESPO X.X. VALUE OF 16  
SCALE: NTS  
DWG NO. **SEC-001**

SECURITY - DEVICE SYMBOL LEGEND		
	FIRE RELAY	110 VAC DEDICATED 20 AMP CIRCUIT
	DOOR CONTACT	ROLL UP DOOR CONTACT
	CARD READER	BIO CARD READER
	KEYPAD CARD READER	LONG RANGE CARD READER
	PUSH BUTTON EXIT - EGRESS	PUSH BUTTON EXIT - EMERGENCY
	PUSH BUTTON EXIT WITH SOUNDER	NURSING PULL STATION
	SINGLE MAGNETIC LOCK	DOUBLE MAGNETIC LOCK
	MAGNETIC LOCK W/ DOOR CONTACT	ELECTRIC DOOR STRIKE
	MORTISE LOCKSET	MORTISE LOCKSET W/ BUILT IN DOOR CONTACT
	CRASH BAR	POWER TRANSFER HINGE
	ELECTRIC LOCK	LOCAL ANNUNCIATOR
	EMERGENCY DOOR RELEASE	DOOR COORD
	KOUBA SYSTEM	SOUNDER
	LONG RANGE MOTION DETECTOR	360 MOTION DETECTOR
	DOOR RELEASE BUTTON	HOLD-UP BUTTON
	GLASS BREAK SENSOR	STROBE (G) GREEN & (B) BLUE
	ALARM SIREN	NETWORK DROP TO ETHERNET IP ADDRESSABLE WAN NETWORK
	TEMPERATURE SENSOR	HUMIDITY SENSOR
	DEDICATED TELCO POTS LINE	ALARM KEYPAD
	INTERCOM MASTER	INTERCOM SUB-STATION
	VIDEO INTERCOM MASTER	VIDEO INTERCOM SUB-STATION
	DOOR BELL BUTTON	DOOR BELL CHIME
	VIDEO CAMERA	180° VIDEO CAMERA
	SECURITY JUNCTION BOX	DIGITAL VIDEO RECORDER
	DOOR NUMBER	DEVICE NUMBER

**SECURITY GENERAL NOTES**

ELECTRICAL CONTRACTOR TO PERFORM THE FOLLOWING:

- PROVIDE 120VAC, 20 AMP DROP TO SUB AND BRANCH CIRCUITS, AT LOCATIONS SHOWN ON FLOOR PLAN OR RISER DIAGRAM, IN EMT OR ARMORED FLEXIBLE CABLE
- FURNISH & INSTALL SINGLE GANG OUTLET BOX 1" DIA. STUB-UP FOR LAN & TELCO CABLES, ADJACENT TO SJB. (CABLING & TERMINATIONS PROVIDED BY OTHERS)
- FURNISH & INSTALL BACK BOXES & STUB-UPS. (WHERE APPLICABLE)

KRATOS TO PERFORM THE FOLLOWING:

- FURNISH, INSTALL, TEST & INTEGRATE ALL CUSTOM SCHLAGE SECURITY MANAGEMENT SYSTEM EQUIPMENT.
- PROVIDE PROGRAMMING FOR ALL INSTALLED SCHLAGE SMS COMPONENTS.
- COORDINATE INSTALLED LOCATIONS OF APPLICABLE FIELD DEVICES.
- ABIDE BY ALL APPLICABLE NATIONAL & LOCAL CODES PERTAINING TO INSTALLATION OF THE SYSTEM.

ADDITIONAL CLARIFICATIONS:

- ALL MECHANICAL & DOOR HARDWARE BY GC.
- STOREROOM LOCKSETS / DOOR CLOSERS TO BE INSTALLED WHEN ELECTRIC STRIKES UTILIZED - PROVIDED BY GC.
- ALL ELECTRONIC HARDWARE TO BE 24VDC PROVIDED BY GC.
- CLASS E INTERCONNECTIONS TO BE COORDINATED BETWEEN PRUDENTIAL / GC / FIRE VENDOR. (WHERE APPLICABLE).

**CABLE NOTES**

**A** 6 COND./ 18 AWG - TWISTED / STRANDED / SHIELDED / PLENUM TO THE SJB  
**B** 4 COND./ 18 AWG - TWISTED / STRANDED / SHIELDED / PLENUM TO THE SJB  
**C** 1-RG59U COAX/VIDEO/PLENUM (SOLID CENTER CONDUCTOR \_ 95% BRAID)  
**D** 1-2 COND./ 18 AWG - TWISTED / STRANDED / SHIELDED / PLENUM TO THE SJB  
**E** 1-RG59U COAX/VIDEO/PLENUM (SOLID CENTER CONDUCTOR \_ 95% BRAID)  
**F** RG-59 2 COND. / 18AWG TO RECORDER  
**G** MASTER TO DOOR: AIPHONE #871802 BETWEEN MASTERS/SUBS; AIPHONE #871804 CAT5e/6 ETHERNET CABLE

**SECURITY - DEVICE LABEL LEGEND**

<b>*</b> EXISTING DEVICE	N	NEW DEVICE
AC ACCESS CONTROL	D	DEMO
AP ALARM POINT	IC	INTERCOM
VC VIDEO CAMERA	DB	DOOR BELL
DR DOOR DEVICE	KP	KEY PAD

**GENERAL NOTES**

1. DRAWINGS ARE NOT TO BE USED FOR ARCHITECTURAL OR ENGINEERING PURPOSES. THE SECURITY DRAWINGS SHOULD ONLY BE USED FOR SECURITY SYSTEMS INSTALLATION AND COORDINATION.

2. ALL MOUNTING SPECIFICS SHALL BE AS INDICATED IN THE LEGEND UNLESS OTHERWISE NOTED IN THE SECURITY DRAWINGS. MOUNTING CONDITIONS IDENTIFIED ON THE SECURITY DRAWINGS SHALL TAKE PRECEDENCE OVER THE LEGEND DESCRIPTIONS.

3. VERIFY AND COORDINATE THE EXACT MOUNTING LOCATION OF ALL DEVICES PRIOR TO INSTALLATION.

4. THE MOUNTING HEIGHTS ARE TO THE CENTERLINE OF THE DEVICE UNLESS OTHERWISE NOTED.

5. THE INSTALLATION CONTRACTOR SHALL RESTORE CEILINGS AND WALLS AND ANY OTHER SURFACES AFFECTED BY HIS WORK WITH LIKE MATERIALS TO MATCH EXISTING CONSTRUCTION UPON COMPLETION OF HIS WORK.

6. FIRE STOPPING OF ALL PENETRATIONS SHALL BE PROVIDED BY THE INSTALLATION CONTRACTOR AS REQUIRED BY CODE.

**SECURITY - NOTES**

1. ALL DEVICES, WIRING, TERMINATION AND OTHER REQUIRED ROUGH-IN NOT DESIGNATED AS "BY OTHERS", ARE TO BE PROVIDED BY THE INSTALLATION CONTRACTOR.

2. ALL SECURITY DEVICES PROVIDED BY THE SECURITY CONTRACTOR, NOTES BELOW INDICATE WORK BY THE ELECTRICAL CONTRACTOR.

1 PROVIDE 4" x 4" x 2 1/4" DEEP BOX WITH SINGLE GANG DEVICE RING [B] FLUSH MOUNTED 48" A.F.F. WITH 3/4" CONDUIT STUB-UP TO [J1] BY ELECTRICAL CONTRACTOR.

2 STUB 3/4" CONDUIT OR GREENFIELD DOWN FRAME ON THE HINGE SIDE OF THE DOOR BACK BOX [EL] TO JUNCTION BOX [JT] LOCATED ABOVE ACCESSIBLE CEILING, BY ELECTRICAL CONTRACTOR.

3 STUB 3/4" CONDUIT OR GREENFIELD DOWN DOOR FRAME ON THE STRIKE SIDE OF THE DOOR [ES] TO JUNCTION BOX [J1] LOCATED ABOVE ACCESSIBLE CEILING, BY ELECTRICAL CONTRACTOR.















KRATOS PUBLIC SAFETY & SECURITY SOLUTIONS, INC.  
3 TOWER OFFICE PARK, WOBURN, MA 01801  
PHONE: (781) 932-1780 FAX: (781) 932-1901

DATE: NOVEMBER 8, 2013

## PROPOSAL FOR: GREENBELT MANAGEMENT LLC SECURITY SYSTEMS INSTALLATION SALIENT SYSTEMS (OPTION A)

### Scope of Work:

*Kratos shall provide the following proposed security solution for Greenbelt Management, LLC at the facility located at 180 Johnson Street in Middletown, CT. Kratos has designed security systems that include the following: Access Control, IP Video System, Intrusion Detection, and IP Intercom. This proposal is based the Architectural drawings provided by Greenbelt Management.*

### **CCTV System (Salient Systems)**

*Kratos shall furnish and install the following **Salient Systems**, IP Video System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The video storage calculations were based on – **30 Days Retention, 30% Motion, 15 Frames per Second**. The device counts are as follows:*

- *Salient Systems CompleteView Enterprise Software*
- *CompleteView Enterprise Single Camera Licenses –Quantity 33*
- *Salient Ultra NVR with 24TB RAID 5 Storage –Quantity 1*
- *Salient Client Workstation –Quantity 1*
- *22" LED Monitor for viewing –Quantity 2*
- *Winsted Locking Security Cabinet –Quantity 1*
- *HP 24-Port PoE Network Switch –Quantity 3*
- *HP Fiber GBIC for network switch –Quantity 5*
- *17" LCD Console with Integrated KVM Switch –Quantity 1*
- *CyberPower 1500VA UPS –Quantity 1*

### Cameras (Locations shown on drawings)

- *180 Degree, 7MP IP Camera –Quantity 6*
- *Indoor 1MP Vandal Resistant IP Dome Camera –Quantity 21*
- *Exterior 3MP Vandal Proof IP Dome Camera –Quantity 6*
- *Camera Mounting Brackets and Accessories*
- *CAT6 Cable, Patch Cords, Misc Materials*

Initials \_\_\_\_\_ Date \_\_\_\_\_

### **Access Control System**

Kratos shall furnish and install the following **Software House** Access Control System. Kratos will also provide the CCURE 9000 Web Client, so that the system can be accessed remotely via a web browser. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Software House Access Control Server –**Quantity 1**
- 24VDC Lock Power Supply with Battery Backup –**Quantity 1**
- Card Readers –**Quantity 7**
  - a. Exterior Gate Card Reader Access
  - b. Elevator Card Reader Access
  - c. Main Entrance
  - d. Access from Reception to Locker rooms/Bathrooms
  - e. Access into the production area
  - f. Vault Room
  - g. Rear Exit
- Request to Exit Motions –**Quantity 5**
- Door Contacts –**Quantity 6**
- 12V 7AH Backup Battery –**Quantity 2**
- Proximity Cards –**Quantity 50**
- Access Control Composite Cable

### **IP Video Intercom System**

Kratos shall furnish and install the following **Aiphone** IP Video Intercom System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Aiphone Surface Mounted IP Video Intercom Door Station –**Quantity 3**
  - a. Exterior Gate
  - b. Main Entrance
  - c. Access into the production area
- Aiphone IP Video Intercom Master Station –**Quantity 1**
  - a. Reception Area
- PC Master Station Software –**Quantity 1**
- Low voltage cable for Intercom System

### **Intrusion Detection System**

Kratos shall furnish and install the following **Honeywell** Intrusion Detection System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Honeywell Intrusion Alarm Panel –**Quantity 1**
- 24VDC Lock Power Supply with Battery Backup –**Quantity 2**
- 8-Zone Expansion Modules –**Quantity 5**
- LCD Keypad –**Quantity 2**
  - a. Main Entrance/Reception
  - b. Rear Exit
- 360 Degree Ceiling Mounted Motion Detector –**Quantity 22**
- Door Contacts –**Quantity 20**
- Panic Button –**Quantity 1**
- Dual Zone Temperature Sensor –**Quantity 7**
- Electronic Humidity Sensor –**Quantity 7**
- 12V 7AH Backup Battery –**Quantity 2**
- Low voltage cable for Intrusion System

### **General Installation Notes**

- Kratos will provide and install Miscellaneous Materials which may include all required enclosures, power supplies, connectors, equipment cabinets/racks and cable for the head end installation.
- Kratos will provide all product submittals, including shop drawings, O &M manuals, and product support as required.

### **Contingencies:**

1. 120VAC is by others
2. Network and fire drops by others
3. **All conduits and cable raceways shall be provided by others**
4. Overtime work is not included
5. Taxes/Permits/Fees not included
6. **Union labor/Prevailing Wage is not included**
7. **Electric door Locking hardware is not included**
8. PC Workstations are not included in the proposal
9. A Badging workstation (printer, camera, etc) is not included
10. CAD floor plans for as-builts to be provided for by others
11. Central Station Monitoring Contract will be separate from this proposal

thereto (collectively, "Confidential Information"). So long as and to the extent that Confidential Information is marked "Confidential" or "Proprietary" (if in tangible form) or is not generally available to the public from other sources, each Party shall safeguard such Confidential Information in the manner in which it safeguards its own confidential information, and shall not disclose Confidential Information to its employees, contractors and agents, except to the extent necessary to enable it to fulfill its obligations under this Agreement. The obligations of this Section 7 shall survive for two (2) years after the termination or expiration of this Agreement. Client shall indemnify Kratos from third party liability arising from any unintended use or unauthorized disclosure.

**8. Termination.** Either Party may, with or without cause, terminate the Services at any time upon ten (10) working days' written notice to the other Party. In either case, Kratos shall be paid costs incurred and fees earned to the date of termination and through demobilization.

**9. Independent Contractor.** Kratos shall perform the Services as an independent contractor.

**10. Force Majeure.** Any delays in or failure of performance by Kratos shall not constitute a default hereunder if such delays or failures of performance are caused by occurrences beyond the reasonable control of Kratos, including but not limited to: acts of God or the public enemy; expropriation or confiscation; compliance with any order of any governmental authority; changes in law; act of war, rebellion or sabotage or damage resulting there from; fires, floods, explosion, accidents, riots; strikes or other concerted acts of workmen, whether direct or indirect; delays in permitting; or any other causes, whether similar or dissimilar, which are beyond the reasonable control of Kratos. In the event such occurrence impacts Kratos' obligations hereunder or causes Kratos to incur additional costs, Kratos' obligations shall be equitably adjusted and it shall be entitled to reimbursement for such additional costs.

**11. Change Management.** Either Party may initiate a change by advising the other Party in writing of the change believed to be necessary. As soon thereafter as practicable, Kratos shall prepare and forward to Client a cost estimate for the adjustment to the price, and a schedule impact of the change, and any effect on Kratos' ability to comply with any of its obligations under this Agreement, including warranties and guarantees. Client shall advise Kratos in writing of its approval or disapproval of the change. If Client approves the change, Kratos shall perform the Services as changed. If Client disapproves, the proposed change may be referred to senior management of the Parties.

**12. Governing Law; Arbitration.** The Agreement shall be governed by and construed in accordance with the laws of Delaware without regard to conflicts of law principles. The senior management of each Party shall first attempt to resolve any dispute arising under this Agreement; if a resolution cannot be reached, the Parties agree to submit such dispute to arbitration under the then current commercial arbitration rules of the American Arbitration Association ("AAA") and conduct the arbitration at a location mutually agreeable to the Parties. The arbitrator's decision shall be final and binding, and may be entered in any court having jurisdiction thereof. Each Party shall pay its own costs and expenses incurred in connection with the arbitration, including legal fees, and each Party shall pay one-half the arbitrator's professional fees and any administrative or filing fees.

**13. Notices.** All notices or other communications to be given by either Party to the other shall be deemed duly given when made in writing and delivered in person or when deposited to the United States mail, postage prepaid, certified, return receipt requested, or sent via confirmed facsimile, and addressed as follows: If to Kratos: Kratos Public Safety & Security Solutions, Inc., Attn: Ryan Morning, 4820 Eastgate Mall STE. 200, San Diego, CA 92121, Tel.: (858) 812-6221, Fax: (858) 812-9376. If to Client: at Client's information below. A Party may change its notice information by giving written notice.

**14. Interpretation.** The Parties acknowledge and agree the terms and conditions of this Agreement, including those relating to allocations of, releases from, exclusions against and limitations of liability have been freely and fairly negotiated. Each Party acknowledges that in executing this Agreement they have relied solely on their own judgment, belief and knowledge, and such advice as they may have received from their own counsel, and they have not been influenced by any representation or statements made by any other Party or its counsel. No provision in this Agreement is to be interpreted for or against any Party because that Party or its counsel drafted such provision. In the event that any portion or all of this Agreement is held to be void or unenforceable, the Parties agree to negotiate in good faith to amend the terms of the Agreement to affect the intent of the Parties as set forth in this Agreement. Except as otherwise provided herein, the Parties agree to look solely to each other with respect to the performance of this Agreement. Kratos may have portions of the Services performed by its affiliated entities or their employees, in which event Kratos shall be responsible for and Client shall look solely to Kratos as if such Services were performed by Kratos hereunder. The provisions of this Agreement which by their nature are intended to survive the termination, cancellation, completion or expiration of the Agreement, including but not limited to any expressed limitations of or releases from liability, shall continue as valid and enforceable obligations of the Parties notwithstanding any such termination, cancellation, completion, or expiration.

**15. Miscellaneous.** Until this Agreement is superseded by a mutually agreeable contract executed by and between the Parties, this Agreement shall constitute the complete basis for the Agreement, and supersedes any other representation, understanding or agreement, oral or otherwise, including terms and conditions that may be included in purchase orders issued by Client to Kratos. Any term or condition of any purchase order shall have no force or effect on Kratos or this Agreement. Any failure by either Party to enforce the other Party's strict performance of any provision of this Agreement will not constitute a waiver of its right to subsequently enforce such provision or any other provision of this Agreement. Kratos shall own exclusively the rights to any software, program, algorithm or other copyrightable material that was owned by or licensed to Kratos prior to its execution of this Agreement, regardless of the use or presence of such material in the creation of any work product or deliverable for Client. The warranties, obligations, liabilities and remedies of Client as provided herein are exclusive and in lieu of any others available at law or in equity. Indemnities against, releases from, assumptions of and limitations on liability and limitations on remedies expressed in this Agreement, as well as waivers of subrogation rights, shall apply notwithstanding the fault, negligence (whether active, passive, joint or concurrent), strict liability or other theory of legal liability of the Party indemnified, released or whose liability is limited or assumed or against whom remedies have been limited or rights of subrogation have been waived and shall extend to the officers, directors, employees, licensors, agents, partners and related entities of such Party and its partners and related entities.

**16. Installation Time.** Kratos assumes that the Services will be performed between the hours of 7am to 4pm, Monday through Friday, exclusive of Kratos holidays. Unless specifically stated herein otherwise, Client shall incur additional charges for work required outside of these time frames.

**17. Drawings.** Client shall provide Kratos with an electronic version of drawings for the performance of the Services. Client shall provide Kratos to-scale AUTOCAD drawings in electronic format. If Client cannot provide these drawings, an additional charge may accrue for Kratos to create drawings necessary for the completion of the Services.

**18. Patch/Paint Exclusion.** In the normal process of installation, patching and painting in certain areas may be required. Unless specifically stated herein, Kratos has not included provisions to provide any patching of walls or painting.

**19. Client Responsibilities.** Every proposal requires certain parts, pieces, or labor to be provided by Client. Kratos has made every attempt to list the responsibilities of Client in this proposal. These responsibilities may include, but are not limited to, AC power connections, lighting conditions, network drops, or IP addresses, and structural integrity.

**SALES CONTACT: Ty Miller – 607.592.6912 – [ty.miller@kratospss.com](mailto:ty.miller@kratospss.com)**

\_\_\_\_\_  
Customer Signature

\_\_\_\_\_  
Date:



KRATOS PUBLIC SAFETY & SECURITY SOLUTIONS, INC.  
3 TOWER OFFICE PARK, WOBURN, MA 01801  
PHONE: (781) 932-1780 FAX: (781) 932-1901

DATE: NOVEMBER 8, 2013

## PROPOSAL FOR: GREENBELT MANAGEMENT LLC SECURITY SYSTEMS INSTALLATION INDIGOVISION (OPTION B)

### Scope of Work:

Kratos shall provide the following proposed security solution for Greenbelt Management, LLC at the facility located at 180 Johnson Street in Middletown, CT. Kratos has designed security systems that include the following: Access Control, IP Video System, Intrusion Detection, and IP Intercom. This proposal is based the Architectural drawings provided by Greenbelt Management.

### **CCTV System (IndigoVision)**

Kratos shall furnish and install the following **IndigoVision**, IP Video System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The video storage calculations were based on – **30 Days Retention, 30% Motion, 15 Frames per Second**. The device counts are as follows:

- IndigoVision Video Management Software
- IndigoVision Single Camera Licenses –**Quantity 61**
- IndigoVision NVR with 30TB RAID 6 Storage –**Quantity 1**
- IndigoVision Video Client Workstation –**Quantity 1**
- 22" LED Monitor for viewing –**Quantity 2**
- Winsted Locking Security Cabinet –**Quantity 1**
- HP 24-Port PoE Network Switch –**Quantity 3**
- HP Fiber GBIC for network switch –**Quantity 5**
- 17" LCD Console with Integrated KVM Switch –**Quantity 1**
- CyberPower 1500VA UPS –**Quantity 1**

### Cameras (Locations shown on drawings)

- Indoor 2MP IP Dome Camera –**Quantity 55**
- Exterior 5MP Vandal Resistant IP Dome Camera –**Quantity 6**
- Software Upgrade Plan (SUP) for IndigoVision –**Quantity 61**
- Camera Mounting Brackets and Accessories
- CAT6 Cable, Patch Cords, Misc Materials

Initials \_\_\_\_\_ Date \_\_\_\_\_

### **Access Control System**

Kratos shall furnish and install the following **Software House** Access Control System. Kratos will also provide the CCURE 9000 Web Client, so that the system can be accessed remotely via a web browser. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Software House Access Control Server –**Quantity 1**
- 24VDC Lock Power Supply with Battery Backup –**Quantity 1**
- Card Readers –**Quantity 7**
  - a. Exterior Gate Card Reader Access
  - b. Elevator Card Reader Access
  - c. Main Entrance
  - d. Access from Reception to Locker rooms/Bathrooms
  - e. Access into the production area
  - f. Vault Room
  - g. Rear Exit
- Request to Exit Motions –**Quantity 5**
- Door Contacts –**Quantity 6**
- 12V 7AH Backup Battery –**Quantity 2**
- Proximity Cards –**Quantity 50**
- Access Control Composite Cable

### **IP Video Intercom System**

Kratos shall furnish and install the following **Aiphone** IP Video Intercom System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Aiphone Surface Mounted IP Video Intercom Door Station –**Quantity 3**
  - a. Exterior Gate
  - b. Main Entrance
  - c. Access into the production area
- Aiphone IP Video Intercom Master Station –**Quantity 1**
  - a. Reception Area
- PC Master Station Software –**Quantity 1**
- Low voltage cable for Intercom System

### **Intrusion Detection System**

Kratos shall furnish and install the following **Honeywell** Intrusion Detection System. Kratos will provide all system components, programming, testing, commissioning, head-end terminations and training of the system. The device counts are as follows:

- Honeywell Intrusion Alarm Panel –**Quantity 1**
- 24VDC Lock Power Supply with Battery Backup –**Quantity 2**
- 8-Zone Expansion Modules –**Quantity 5**
- LCD Keypad –**Quantity 2**
  - a. Main Entrance/Reception
  - b. Rear Exit
- 360 Degree Ceiling Mounted Motion Detector –**Quantity 22**
- Door Contacts –**Quantity 20**
- Panic Button –**Quantity 1**
- Dual Zone Temperature Sensor –**Quantity 7**
- Electronic Humidity Sensor –**Quantity 7**
- 12V 7AH Backup Battery –**Quantity 2**
- Low voltage cable for Intrusion System

### **General Installation Notes**

- Kratos will provide and install Miscellaneous Materials which may include all required enclosures, power supplies, connectors, equipment cabinets/racks and cable for the head end installation.
- Kratos will provide all product submittals, including shop drawings, O &M manuals, and product support as required.

### **Contingencies:**

1. 120VAC is by others
2. Network and fire drops by others
3. **All conduits and cable raceways shall be provided by others**
4. Overtime work is not included
5. Taxes/Permits/Fees not included
6. **Union labor/Prevailing Wage is not included**
7. **Electric door Locking hardware is not included**
8. PC Workstations are not included in the proposal
9. A Badging workstation (printer, camera, etc) is not included
10. CAD floor plans for as-builts to be provided for by others
11. Central Station Monitoring Contract will be separate from this proposal



**7. Confidential Information.** Each Party may make available to the other access to certain trade secrets and other confidential technical, business and financial information, including the contents of this Agreement and the Exhibits thereto (collectively, "Confidential Information"). So long as and to the extent that Confidential Information is marked "Confidential" or "Proprietary" (if in tangible form) or is not generally available to the public from other sources, each Party shall safeguard such Confidential Information in the manner in which it safeguards its own confidential information, and shall not disclose Confidential Information to its employees, contractors and agents, except to the extent necessary to enable it to fulfill its obligations under this Agreement. The obligations of this Section 7 shall survive for two (2) years after the termination or expiration of this Agreement. Client shall indemnify Kratos from third party liability arising from any unintended use or unauthorized disclosure.

**8. Termination.** Either Party may, with or without cause, terminate the Services at any time upon ten (10) working days' written notice to the other Party. In either case, Kratos shall be paid costs incurred and fees earned to the date of termination and through demobilization.

**9. Independent Contractor.** Kratos shall perform the Services as an independent contractor.

**10. Force Majeure.** Any delays in or failure of performance by Kratos shall not constitute a default hereunder if such delays or failures of performance are caused by occurrences beyond the reasonable control of Kratos, including but not limited to: acts of God or the public enemy; expropriation or confiscation; compliance with any order of any governmental authority; changes in law; act of war, rebellion or sabotage or damage resulting there from; fires, floods, explosion, accidents, riots; strikes or other concerted acts of workmen, whether direct or indirect; delays in permitting; or any other causes, whether similar or dissimilar, which are beyond the reasonable control of Kratos. In the event such occurrence impacts Kratos' obligations hereunder or causes Kratos to incur additional costs, Kratos' obligations shall be equitably adjusted and it shall be entitled to reimbursement for such additional costs.

**11. Change Management.** Either Party may initiate a change by advising the other Party in writing of the change believed to be necessary. As soon thereafter as practicable, Kratos shall prepare and forward to Client a cost estimate for the adjustment to the price, and a schedule impact of the change, and any effect on Kratos' ability to comply with any of its obligations under this Agreement, including warranties and guarantees. Client shall advise Kratos in writing of its approval or disapproval of the change. If Client approves the change, Kratos shall perform the Services as changed. If Client disapproves, the proposed change may be referred to senior management of the Parties.

**12. Governing Law; Arbitration.** The Agreement shall be governed by and construed in accordance with the laws of Delaware without regard to conflicts of law principles. The senior management of each Party shall first attempt to resolve any dispute arising under this Agreement; if a resolution cannot be reached, the Parties agree to submit such dispute to arbitration under the then current commercial arbitration rules of the American Arbitration Association ("AAA") and conduct the arbitration at a location mutually agreeable to the Parties. The arbitrator's decision shall be final and binding, and may be entered in any court having jurisdiction thereof. Each Party shall pay its own costs and expenses incurred in connection with the arbitration, including legal fees, and each Party shall pay one-half the arbitrator's professional fees and any administrative or filing fees.

**13. Notices.** All notices or other communications to be given by either Party to the other shall be deemed duly given when made in writing and delivered in person or when deposited to the United States mail, postage prepaid, certified, return receipt requested, or sent via confirmed facsimile, and addressed as follows: If to Kratos: Kratos Public Safety & Security Solutions, Inc., Attn: Ryan Morning, 4820 Eastgate Mall STE. 200, San Diego, CA 92121, Tel.: (858) 812-6221, Fax: (858) 812-9376. If to Client: at Client's information below. A Party may change its notice information by giving written notice.

**14. Interpretation.** The Parties acknowledge and agree the terms and conditions of this Agreement, including those relating to allocations of, releases from, exclusions against and limitations of liability have been freely and fairly negotiated. Each Party acknowledges that in executing this Agreement they have relied solely on their own judgment, belief and knowledge, and such advice as they may have received from their own counsel, and they have not been influenced by any representation or statements made by any other Party or its counsel. No provision in this Agreement is to be interpreted for or against any Party because that Party or its counsel drafted such provision. In the event that any portion or all of this Agreement is held to be void or unenforceable, the Parties agree to negotiate in good faith to amend the terms of the Agreement to affect the intent of the Parties as set forth in this Agreement. Except as otherwise provided herein, the Parties agree to look solely to each other with respect to the performance of this Agreement. Kratos may have portions of the Services performed by its affiliated entities or their employees, in which event Kratos shall be responsible for and Client shall look solely to Kratos as if such Services were performed by Kratos hereunder. The provisions of this Agreement which by their nature are intended to survive the termination, cancellation, completion or expiration of the Agreement, including but not limited to any expressed limitations of or releases from liability, shall continue as valid and enforceable obligations of the Parties notwithstanding any such termination, cancellation, completion, or expiration.

**15. Miscellaneous.** Until this Agreement is superseded by a mutually agreeable contract executed by and between the Parties, this Agreement shall constitute the complete basis for the Agreement, and supersedes any other representation, understanding or agreement, oral or otherwise, including terms and conditions that may be included in purchase orders issued by Client to Kratos. Any term or condition of any purchase order shall have no force or effect on Kratos or this Agreement. Any failure by either Party to enforce the other Party's strict performance of any provision of this Agreement will not constitute a waiver of its right to subsequently enforce such provision or any other provision of this Agreement. Kratos shall own exclusively the rights to any software, program, algorithm or other copyrightable material that was owned by or licensed to Kratos prior to its execution of this Agreement, regardless of the use or presence of such material in the creation of any work product or deliverable for Client. The warranties, obligations, liabilities and remedies of Client as provided herein are exclusive and in lieu of any others available at law or in equity. Indemnities against, releases from, assumptions of and limitations on liability and limitations on remedies expressed in this Agreement, as well as waivers of subrogation rights, shall apply notwithstanding the fault, negligence (whether active, passive, joint or concurrent), strict liability or other theory of legal liability of the Party indemnified, released or whose liability is limited or assumed or against whom remedies have been limited or rights of subrogation have been waived and shall extend to the officers, directors, employees, licensors, agents, partners and related entities of such Party and its partners and related entities.

**16. Installation Time.** Kratos assumes that the Services will be performed between the hours of 7am to 4pm, Monday through Friday, exclusive of Kratos holidays. Unless specifically stated herein otherwise, Client shall incur additional charges for work required outside of these time frames.

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**SALES CONTACT: Ty Miller – 607.592.6912 – [ty.miller@kratospss.com](mailto:ty.miller@kratospss.com)**

\_\_\_\_\_  
Customer Signature

\_\_\_\_\_  
Date:

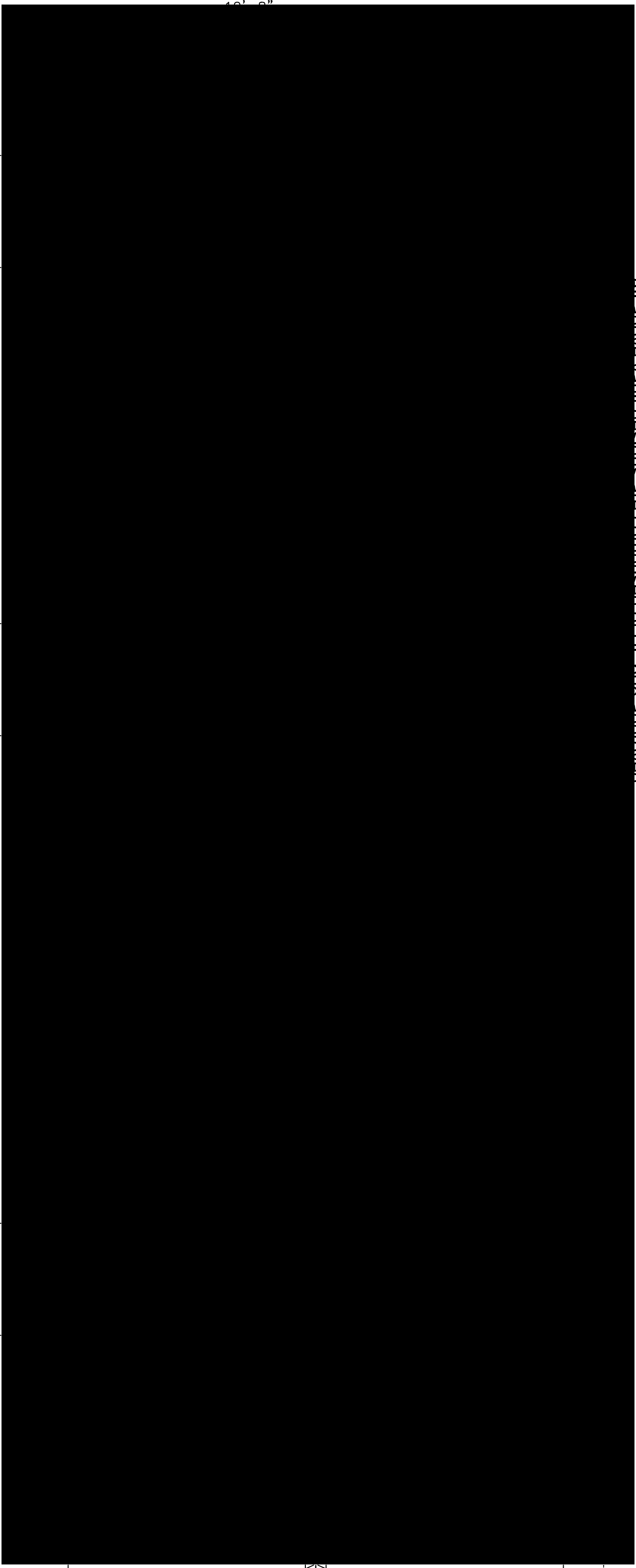


The vault experts  
 tel: 203.403.4205  
 4 Research Drive  
 fax: 203.403.4206  
 Bethel, CT 06801  
 www.customvault.com

JOB NAME: GREENBELT MANAGEMENT  
 LOCATION: MIDDLETOWN, CT

DRAWING #: 13121CV-C  
 DATE: 11/13/13

\*All above vault designs are comprised of LIL 608 approved



4'-0"

PANEL WEIGHT = 10,800 lbs

4'-0"

PANEL WEIGHT = 14,300 lbs

4'-0"

PANEL WEIGHT = 22,700 lbs

CLASS M, LMV SIX-SIDED VAULT SYSTEMS

November 11, 2013

Mr. Jason Nickerson  
Greenbelt Management, LLC  
1189 Post Road, Suite 3A  
Fairfield, CT 06824

Re: DEA Approved Vault Options – Middletown, CT Location

Dear Mr. Nickerson,

Pursuant to our phone and email correspondences enclosed please find this proposal to design, furnish and install an unfinished modular vault system meeting all areas of the DEA requirements for Controlled Substance Storage as part of a building renovation project in Middletown, CT. By meeting all of the DEA's security requirements all State of Connecticut security requirements are fulfilled. Please reference this Custom Vault proposal and associated drawing for specific product and project details.

This proposal is based on our pre-bid review of the specifications, site plans and a general understanding of the existing location. We will assume that we have the required free and clear forklift access for unloading this equipment ground level. The site will then lift the vault panels and door up to the 2<sup>nd</sup> floor location where our installation team will take over and deliver and install the vault as drawn. This system is designed to meet requirements of 21CFR 1301.72 for DEA validated storage of Schedule I and II controlled substances. This is the only approved modular storage option for narcotics and also fulfills all security requirements of State of Connecticut Statute regulations per section 21a-408.

I would like to take this opportunity to review with you our approach to this project and the key design criteria that has gone into this proposal.

Design Criteria:

- As requested we are offering our Lightweight vault panel as the 2<sup>nd</sup> floor vault solution. This DEA approved security product is being bid in a six-sided design that uses the existing slab/floor as a base for the modular vault floor, the four walls and ceiling. The six-sided product should be a requirement by the DEA if the floor slab does not exceed the 8" thickness minimum or there is a security threat from the lower floor. All options meet the DEA's security requirements and exceed State of CT requirements.
- We are designing this free standing structure within your facility primarily to meet/exceed all DEA requirements but also handling the internal structural requirements of the vault system. Vault wall panels are 4" thick for the 8' high system. If the slab is of questionable thickness and condition renovations might be needed but we do not see any notes on the site drawings illustrating the existing slab condition.

- Your foundation plans may require support for the vault system but this will be the responsibility of the project engineer in association with a review of our drawings. Once the vault design is selected loading drawings will be forwarded to the engineer to confirm current slab abilities and any necessary changes.
- The vault system will be a rectangular shaped six-sided modular structure, 8'0" inside height, with one vault door openings to be surface mounted to existing 2<sup>nd</sup> floor area as described above. This approach meets all 21 CFR 1301.72 six-sided vault requirements for DEA validated storage of Schedule I and II controlled substances.

#### Vault Door:

- This system will be accessed by one (1) GSA Approved Class-5 vault door offering a single leaf clear opening of **40"wide x 78"high**. This door will be outfitted with an expanded metal swinging day gate, S & G model #8560 Group 1r locking mechanism and emergency escape devised. This vault door unit meets requirements of upgraded Federal Specification AA-D-600D and exceeds all DEA drug storage requirements.

#### Service Access:

- I have included access for phone, electric, alarm, and CCTV through five (5) 1 ½" offset conduit entries. Final location of this access is pending MEP review.
- I have provided one (1) 1 ½" diameter straight through penetration to accommodate sprinkler access to the vault structure. Location of this access is pending MEP review.
- I have provided two (2) U.L. listed Class-M/DEA approved port vent panels for HVAC access to each vault design option. Port vent panel access is limited to a 4" x 16" offset duct opening and will be used in conjunction with any user furnished systems. Final number of port vent panels is pending mechanical review. See attached detail for port vent panel design. HVAC port vent panels are an extra at \$875.00/unit.

Custom Vault brings to the project a strong blend of professionals with hands-on experience; foresight and expertise in the design, fabrication, delivery and installation of complex UL listed modular vault systems. We hope we have responded to your request for proposal in a manner, which demonstrates our knowledge and ability in this field.

#### **CustomVault Corporation**

*Matthew B. Gifford*

Matthew B. Gifford  
Senior Director of Sales

# Greenbelt Management

## Request for Proposal

### DEA Approved Storage Vault System – Middletown, CT

Proposal # 131113M

\*\*\*\*\*

### NOTES AND COMMENTS

- Price includes vault shop drawings, slab and structural steel details, fabrication and non-union delivery and installation of modular vault system, structural steel and vault door. Davis Bacon/Union wages have not been included but can be at request.
- Vault system to be designed to surface mount to existing warehouse slab. All slab preparation details to be shown on CustomVault shop drawing are by others. Lifting of vault equipment from ground floor delivery area to the 2<sup>nd</sup> floor by the site. Sealed structural details by a licensed engineer in the State of CT can be included for an additional cost. Permits, by others. Base building designs are the responsibility of others.
- All vault designs, connections and equipment meet or exceed DEA requirements (21CFR 1301.72) for secure storage of schedule-I and II product.
- Vault system includes access for electrical, phone, alarm systems through five (5) 1 ½” diameter conduit entries. Additional conduits are an extra @ **\$200.00/opening**. One (1) 1 ½” diameter straight through penetrations for sprinkler access are included. Additional sprinkler are an extra @ **\$550.00/penetration plus pipe**. Vault to include two (2) UL listed Class-M/DEA approved port vent panels in base pricing. Additional port vents are an extra at **\$775.00/unit**.
  - Terms of payment:                   20% with award  
  20% with approved design  
  Remainder due with completion

Thank you very much for this opportunity!

At any time if there are questions or concerns please do not hesitate to contact: Matt Gifford, Sr. Director of Government Sales, Custom Vault Corporation, 4 Research Drive, Bethel, CT 06801 Office # 203.403.4231 Fax # 203.798.8109 Cell # 203.943.2772 or email mgifford@customvault.com.

November 11, 2013

Mr. Jason Nickerson  
Greenbelt Management, LLC  
1189 Post Road, Suite 3a  
Fairfield, CT 06824

Re: Middletown, CT - Modular Vault Pre-Certification

Dear Mr. Nickerson,

Custom Vault Corporation pre-certifies that the designs for the above referenced project meet the requirements of Federal Specification 21CFR 1301.72 for DEA validated storage of Schedule-I and II controlled substances and State of Connecticut Drug Control Division Specifications 21a-408. Please see associated CustomVault drawings for complete vault design options and layout details.

This **six-sided** vault solution can be located anywhere in the warehouse, currently its located on the 2<sup>nd</sup> floor.

The vault will be equipped with a GSA Class-V single leaf main vault door offering a clear opening of 40" wide x 78" high. This vault door will be outfitted with a Sargent & Greenleaf model #8560 **Group 1r** locking mechanism and emergency escape mechanism. Because of the controlled high security area of this system there will be a standard day gate.

Both the vault system and the vault door will be installed per manufacturer's specifications and together meet all DEA requirements for secure storage of controlled substances.

All components of this system (including access for HVAC) have passed testing in accordance with the UL #608 standard "Burglary Resistant Vault Doors" and "Modular Panels." This is the standard by which all products of this type are tested. It includes attacks by cutting torches, fluxing rods, hydraulic tools and common hand tools.

Please keep this certificate on file for future reference, and don't hesitate to contact the author for further confirmation on this approach.

Very truly yours,

**CustomVault Corporation**

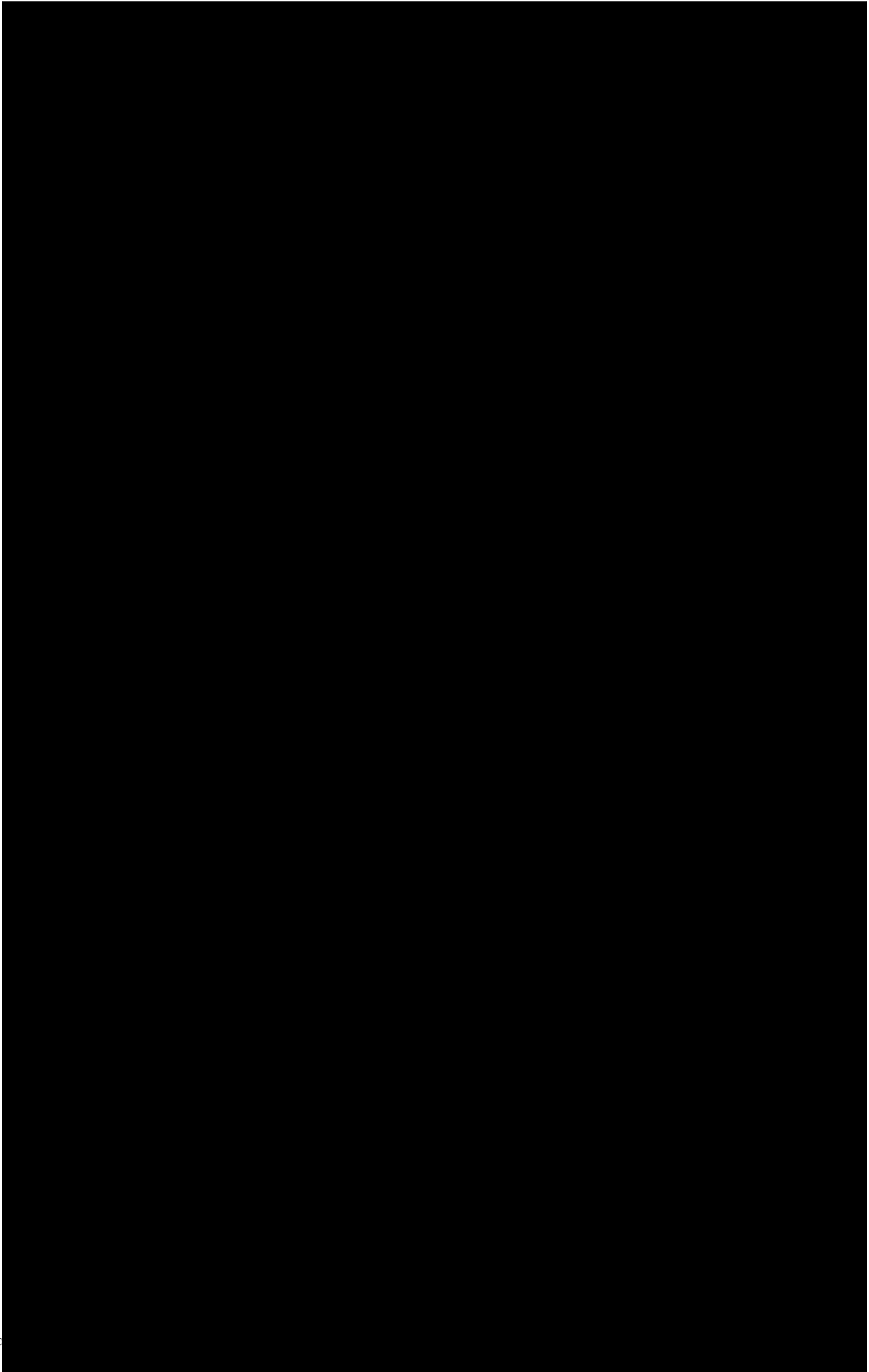
*Matthew B Gifford*

Matthew B Gifford  
Director of Sales

MJE:mbg







[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

## **Matthew Nickerson Supplemental Information**

Matthew currently serves as a Senior Associate at Massey Knakal Realty Services, as well as a financial analyst at CH Nickerson & Co.

Massey Knakal is a diversified real estate company, exclusively representing owners in the sale, retail lease and/or financing of their properties. With over 150 employees, four offices and thorough coverage of the five boroughs of New York City, Westchester County, Long Island and New Jersey, Massey Knakal Realty Services excels in the New York metropolitan area's property transaction marketplace and is recognized as the number one investment sales firm in the New York City Metropolitan area over the last 12 years, by Co-Star Research, an independent third party. Since 1988 the firm has closed 4,500 transactions with an aggregate value in excess of \$17 billion. The size and nature of the company make it difficult to list any and all previously alleged violations, specifically in regards to certain minor licensing fines. As far as Matthew is aware, the company is in good standing with the city and state governing bodies, as well as the Real Estate Board of New York. However, while Matthew Nickerson has present, he is not aware of any significant alleged violations and neither he nor his direct team has received any violations of any kind.

In his role at Massey Knakal, Matthew operates within a team of 9 that is consistently recognized as the top-performing group within the company. Since joining in May of 2011, Matthew has sold over 70 properties for an aggregate value of more than \$700 million. Constantly underwriting properties gives Matthew invaluable experience in cash-flow analysis and accounting. Often dealing with complex negotiations and financial engineering, Matthew has a deep understanding of what it takes to not only make the numbers work, but bring personalities together, to make a deal.

Additionally, Matthew has served as a Financial Analyst for his family company, CH Nickerson & Co, since May of 2009. C.H. Nickerson and Company, Inc., a family-owned general contracting firm located at 49 Hayden Hill Road Torrington, Connecticut. C.H. Nickerson specializes in environmental construction, particularly water and wastewater treatment plant construction, and typically performs \$80-100 million worth of contracted work annually throughout New England. Matthew helps oversee an investment portfolio in excess of \$30m, invested in stocks, bonds, and alternative assets. He routinely reviews performance, operating budgets and capital allocation, adjusting to market conditions and the company's needs.

Both of the roles provide significant financial and accounting experience that will help Greenbelt Management navigate the early stages of company development, ensuring budgets are met, management controls are effective, and ultimately the company is profitable. Also, Matthew's ability to successfully negotiate contracts will help the company manage all of our anticipated vendor relationships. Lastly, his role at Massey Knakal in particular provides Matthew with a very strong network of successful professionals in a variety of fields, who Greenbelt can draw from for guidance and advice throughout the coming years.

## Jason Nickerson

In addition to being an owner and the COO of Greenbelt Management, LLC, Jason is also a principal and the Director of Development for C.H. Nickerson and Company, Inc., a family-owned general contracting firm located at 49 Hayden Hill Road Torrington, Connecticut. C.H. Nickerson specializes in environmental construction, particularly water and wastewater treatment plant construction, and typically performs \$80-100 million worth of contracted work annually throughout New England. Since the vast majority of C.H. Nickerson's projects are won through highly-regulated bidding processes and are performed for municipal clients, the company's success is largely dependent on its ability to competitively navigate and adhere to government contracts and standards. Strict compliance, attention to detail, and exacting organization are expectations that are deeply ingrained in the culture of the company, which in seventy-four years of operation has never been alleged to have violated any state or federal regulations beyond a few minor safety citations.

In his role as C.H. Nickerson's Director of Development, a position Jason has held since April of 2007, he has worked closely with the management, Chairman, other principals and the Board of Directors to identify and manage modernization initiatives in marketing and the successful pursuit of work outside the scope of the company's core niche--for example design-bid-build format work and real estate development, while as a principal Jason plays an integral role in all aspects of the company's strategic initiatives and general administration. Being engaged in both micro and macro roles at the company lends Jason a holistic understanding of the business, while the continuous exercise of team building and deployment in uncharted territory has given him the managerial skills and tools needed to build a startup company in a brand new industry.

Nick Hice Supplemental Information

Business name: Denver Relief  
Products or services offered: Medical marijuana and associated products, which include extracts, salves and other topicals, tinctures, oral sprays, pills, olive oil, baked goods and pre-filled vaporizer cartridges, as well as vaporizer accessories  
Location: 1 Broadway #A 150 Denver Co. 80203.  
Title: Co-Owner and Cultivation Facility Manager  
Association with business: 16 months as owner, 3 years, 10 months as employee  
Current role at the business: August 2010 - Present  
Alleged violations of law or regulation: Yes – Co-Owner  
None

Business name: Caesars Creek Nursery & Landscaping  
Product or services offered: Nursery and Garden Center Management.  
Location: 4230 Ohio 73, Waynesville, OH 45068  
Title: Project Manager, Sales/designer/grower.  
Association with the business: 2000-2009  
Current role at the business: No – resigned to move to Colorado in 2009  
Alleged violations of law or regulation: None

## Jill Lamoureux Supplemental Information

Business name: Boulder County Caregivers

Products or services offered: Medical marijuana, edibles, and concentrates.

Location: 2995 Baseline Rd., Boulder, CO 80304

Title: Managing Member and CEO - June 2008 – June 2012  
Member - June 2012 - Present

Association with business: June 2008 - Present

Current role at the business: No current active role in the business, sold the majority share in June 2012 and have not had any management role or employment with the business since December 2012. I currently hold 10% of the business.

Alleged violations of law or regulation: None

Business name: The Health Center

Products or services offered: Medical marijuana, edibles, and concentrates.

Location: 2777 S. Colorado Blvd., Denver, CO 80222

Title: Owner and Vice-President – June 2011 – April 2012

Association with business: June 2011 – April 2012

Current role at the business: No current active role in the business, sold all shares in April 2012.

Alleged violations of law or regulation: None

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:

- 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.

Kayvan Khalatbari founded and co-owns Denver Relief, which is Denver’s oldest and Colorado’s second oldest medical marijuana center in the state. Denver Relief is located at 1 Broadway, A150, Denver, CO 80203 and offers a wide variety of award-winning medical marijuana and associated products, which include extracts, salves and other topicals, tinctures, oral sprays, pills, olive oil, baked goods and pre-filled vaporizer cartridges, as well as vaporizer accessories. Kayvan has served as General Operations Manager since Denver Relief’s inception in May 2009 and maintains that position to this day, in collaboration with two assistant general managers. Denver Relief is considered a model in cultivation, processing and retail operations and was recently referred to as “the model for the state of Colorado” by Medical Marijuana Enforcement Director Laura Harris.

Kayvan also founded Denver Relief Consulting in 2011 and currently acts Principal Consultant nationally and internationally, providing best practice guidance to clients concerning marijuana cultivation, processing, extraction and retail, ancillary services and referrals, government relations and community integration. Denver Relief Consulting is located at 1 Broadway, A200, Denver, CO 80203. Kayvan has designed more than 30 cultivation and retail facilities and is currently assisting clients with state application preparation, local municipality approval and operational methodology in Arizona, Colorado, Maine, Massachusetts, Nevada, Oregon, Vermont, Washington, the District of Columbia, Canada and the United Kingdom.



## Greenbelt Management – Summary of Qualifications

2. Provide a brief summary (no longer than five double-spaced pages) of the applicant's qualifications, experience and industry knowledge relevant to the development and operation of a production facility.

### Ownership and Management Team

**Jason Nickerson** is an owner and the COO of Greenbelt Management, LLC. Jason is also a principal and the Director of Development for C.H. Nickerson and Company, Inc., a family-owned general contracting firm located at 49 Hayden Hill Road Torrington, Connecticut. C.H. Nickerson specializes in environmental construction, particularly water and wastewater treatment plant construction, and typically performs \$80-100 million worth of contracted work annually throughout New England. Since the vast majority of C.H. Nickerson's projects are won through highly-regulated bidding processes and are performed for municipal clients, the company's success is largely dependent on its ability to competitively navigate and adhere to government contracts and standards. Strict compliance, attention to detail, and exacting organization are expectations that are deeply ingrained in the culture of the company, which in seventy-four years of operation has never been alleged to have violated any state or federal regulations beyond a few minor safety citations. Being engaged in both micro and macro roles at the company lends Jason a holistic understanding of the business, while the continuous exercise of team building and deployment in uncharted territory has given him the managerial skills and tools needed to build a startup company in a brand new industry while his construction experience will ensure a rapid construction period allowing for cultivation operations to begin as quickly as possible.

**Matthew Nickerson** is a graduate of Emory University where he studied business administration and finance. Also a Connecticut native, Matthew's career has focused on financial discipline, portfolio management, commercial brokerage and real estate investment fund development. Matthew has a unique combination of financial analysis and project management skills to coordinate the aspects of complicated marijuana business functions such as cash flow projections, production demand forecasting and compliance management. Matthew's expertise also provides

Greenbelt Management with the ability to raise and manage capital, and successfully navigate complicated licensing and regulatory processes. Matthew brings experience as a mentor, team leader, and coach to the project ensuring a team oriented company focused on success and longevity. Matthew will also provide day-to-day management oversight of the operation.

#### Consulting Team

**Denver Relief Consulting (DRC)** is a full-service medical marijuana consulting firm located in Denver, Colorado. Greenbelt Management has engaged DRC throughout the licensing and start-up process. DRC's principals have over two decades of combined experience in the medical marijuana field. Their team is nationally known and hails from some of the longest running and most respected operations in Colorado and the nation. The DRC team brings medical marijuana knowledge and experience to Greenbelt Management assisting the operation in achieving a professional, efficient, and successful start-up.

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**Jill Lamoureux, Best Practice Consultant:** Jill Lamoureux is a former cannabis dispensary operator and the lead compliance consultant for Denver Relief Consulting. Ms. Lamoureux has earned national recognition for her and expertise in best practice and operating standards working with the American Herbal Pharmacopeia, American Herbal Products Association, and Americans for Safe Access to develop national industry standards. With an emphasis on comprehensive compliance goals, she works with a variety of clients navigating the complex application and post-licensing processes throughout the United States and in Canada. Ms. Lamoureux provides specialized knowledge necessary for developing policies and procedures in highly-regulated environments. Her post-licensing focus on good production, manufacturing, handling, and management practice will ensure safe products from the Greenbelt Management operation.

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**Kayvan Khalatbari, Operations Consultant:** Kayvan Khalatbari is the co-founder and executive director of Denver Relief, the second longest-operating dispensary in all of Colorado. He is a passionate spokesman for the evolution of

a normalized medical marijuana industry. Mr. Khalatbari specializes in the development of cultivation and retail facilities, infused products manufacturing, cultivation operations, and community outreach programs. As a founding partner of Denver Relief Consulting, he offers comprehensive guidance for the development and management of national and international cannabis operations. He is a lead consultant for clients throughout the United States and Canada, and serves as an advisory board member for the first dispensary awarded a license in Vermont and will serve on multiple boards for Massachusetts medical marijuana facility applicants.

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**Nick Hice, Cultivation Consultant:**

NICK HICE is a master cultivator known for managing one of the most successful commercial cannabis operations in Colorado. As a founding partner of Denver Relief Consulting, Nick brings over 15 years of experience with indoor growing under high intensity lighting to national and international clients. His innovative plant care techniques and dynamic approach to cultivation team management have led to the development of highly-regarded operations that exemplify industry best practices and maximum efficiency in legal cannabis cultivation. Nick specializes in stabilizing controlled growing environments, minimizing pests and pathogen harms, and implementing nutrient monitoring systems. He has first-hand experience building high-tech greenhouses, and constantly pursues knowledge of new cultivation techniques for high yield cannabis crops.

Advisory Team

**David Hochman, Healthcare Finance Advisor:** Mr. Hochman graduated with honors from the University of Michigan and is a professional financier with over fourteen years of venture capital and investment banking experience. His broad career experience reflects a focus on medical devices and related emerging technologies and addressing their financing requirements. As a venture capitalist Mr. Hochman has successfully secured equity capital for his clients and as a member of several boards and associations, he brings extremely valuable and comprehensive insight in the market, regulatory, and political aspects and challenges of entrepreneurship in today's highly competitive health

care arena. His exposure and expertise with medical device technologies will complement his fiduciary responsibilities and guide Greenbelt Management through many of the common pitfalls that beset the majority of new entrants in the highly specialized realm of therapeutic care and products.

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**Dennis Depaolo, Plant Sciences Advisor:** Mr. Depaolo holds an undergraduate degree in biological sciences from the State University of NY at Cortland and is currently a PhD candidate in plant genetics and a research scientist with a special interest in specialized aspects of horticulture. As a published candidate, his PhD studies at UMASS Amherst also reflect a strong general interest in plant genetics that he will apply to the cannabinoid genetics field, specifically focused on the isolation and enhancement of their attendant therapeutic aspects. Mr. Depaolo strongly believes that those working in this field will develop a new frontier of recognized and robust palliative care options for Connecticut's patient population and beyond.

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**Erin Mulrane, Addiction and Abuse Advisor:** Ms. Mulrane is a behavioral science clinician and therapist specializing in substance abuse. An advocate for the patient population, she will advise and establish policies and provide educational resources and product information on proper therapeutic administration of marijuana for the patient population served by Greenbelt Management's client dispensaries. With her field experience Ms. Mulrane will promote responsible practices and work with dispensaries to identify situations and signs of overmedication and misuse.

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**James C. Witig, M.D., Medical Advisor:** Dr. Witig is a board certified orthopedic surgeon specializing in oncology. Dr. Witig received his doctorate in 1994 from New York University School of Medicine, and has been a practicing physician for the last nineteen years during which he has held license to practice in New York, New Jersey, the District of Columbia, Virginia, and Maryland. Dr. Witig is the recipient of at least twenty-seven awards and honors for his work in medicine. His vast experience in oncology and related conditions makes him a prized member of the

Greenbelt Management team, and his instructional capacity will provide the highest level of expertise in palliative care to inform Greenbelt Management's product development aiding in the development of products that provide a true medical benefit to patients.

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**Jay Malcynsky, Legal Advisor:** Mr. Malcynsky is an attorney who earned his Juris Doctorate from the University Of Bridgeport School Of Law in 1981. Over the past 32 years of his career Mr. Malcynsky has established a well-rounded career within the Connecticut legal community, with an emphasis of experience in government policy and administrative law. In 2001, Mr. Malcynsky was awarded the "Quinnipiac School of Law Distinguished Alumni Award for Public Service. The credentials and legal competence he brings to Greenbelt Management's team and operations are essential to navigate the nascent, rapidly changing, and politically sensitive palliative marijuana therapy movement within the healthcare industry. Mr. Malcynsky will assist Greenbelt Management in the provision of legal, compliant, and safe products to Connecticut's patients ensuring patient and public safety.

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**Peter Leonard, Horticultural Advisor:** Mr. Leonard brings over fifteen years of professional experience and post graduate education in horticulture production. His academic work includes vocational training in floriculture, a B.S from the University of Maine in horticulture science and an M.S in plant breeding from the University of Connecticut. His related career experience includes positions as a grower, supervisor, and sales representative for both wholesale and retail greenhouse and garden center businesses. Currently responsible for six acres of greenhouses of a thirty acre farm where he oversaw all propagation standards and production quotas. Managing an operation of this size has instilled a vast array of anecdotal mitigation experiences with respect to prevalent and typical cultivation disease and pests. Mr. Leonard will ensure the production staff, protocols and procedures are consistent with Greenbelt Management's operational plans and goals.

Exhibits.  
Exhibit A.2. – Qualifications

Greenbelt Management – Application Financial Statement

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

<b>Sources</b>		
Owner Equity	257,225	Jason and Matthew Nickerson Contributions
<b>Total Sources</b>	<b>\$257,225</b>	
<b>Uses</b>		
Application Fee	25,000	Department of Consumer Protection
Design and Engineering	22,800	\$17,600 – Architecture, \$5,200 Engineering
Lease Option	25,000	City of Middletown
Legal	53,425	Gaffney Bennett
Professional Services	131,000	\$125,000 - Denver Relief Consulting, \$6,000 other accounting and legal
<b>Total Uses</b>	<b>\$257,225</b>	

## Greenbelt Management – Location and Site Plan

### 1. The location of the proposed production facility.

Remington Rand Building A – 2<sup>nd</sup> Floor  
180 Johnson Street, Middletown, CT 06457

#### Description.

Greenbelt Management’s proposed facility will be located at 180 Johnson Street, Middletown, on the second floor of Building “A” as depicted in Figure 1. Figure 2 depicts the 180 Johnson Street site.

The site consists of 10.458 acres of land located at the north end of Johnson Street in Middletown, CT. It is identified by the City of Middletown Tax Assessor’s Office on Map 20 as Lot 13, Block 12-22 and is currently owned by the city of Middletown.

There are three buildings located on the Site including a large main building (175,000 square feet), a boiler building (11,550 square feet), and a Quonset hut (2,400 square feet). The remaining portions of the Site consist of an access drive and landscaped areas that surround the building, parking areas, and areas of undeveloped land. A chain-link fence surrounds the majority of the Site. The Site is provided with City water, natural gas, and electrical utilities. The City recently connected the building to the municipal sewer system.

According to documentation, the Site was used for manufacturing from 1897 to approximately 1971. Prior to 1897 the Site was comprised of undeveloped wetlands and wooded areas. Initial Site development began in 1897 when the main building was constructed by the Keating Wheel and Automobile Company (circa 1897 to 1900). Eisenhuth Horseless Vehicle Company reportedly owned the Site from 1900 to 1909. Remington Noiseless Typewriter Company (Remington) reportedly owned the Site from approximately 1909 to approximately 1970.<sup>1</sup> The Site was acquired by the City of Middletown (City) in 2000.

#### Topography.

The Site is located at approximately 15 to 20 feet above mean sea level (AMSL). The topography of the Site is generally flat with the exception of abrupt slopes along the eastern property line that transition between the developed portions of the property and bordering woodland and wetland areas.

<sup>1</sup> Sourced from an RAP (Remedial Action Plan) prepared for the City of Middletown in 2011 by VHB/Vanasse Hangen Brustlin, Inc. Document can be viewed at <http://www.middletownplanning.com/Specialprojects/RemRand/RemRand.html>

Figure 1: Greenbelt Management Facility

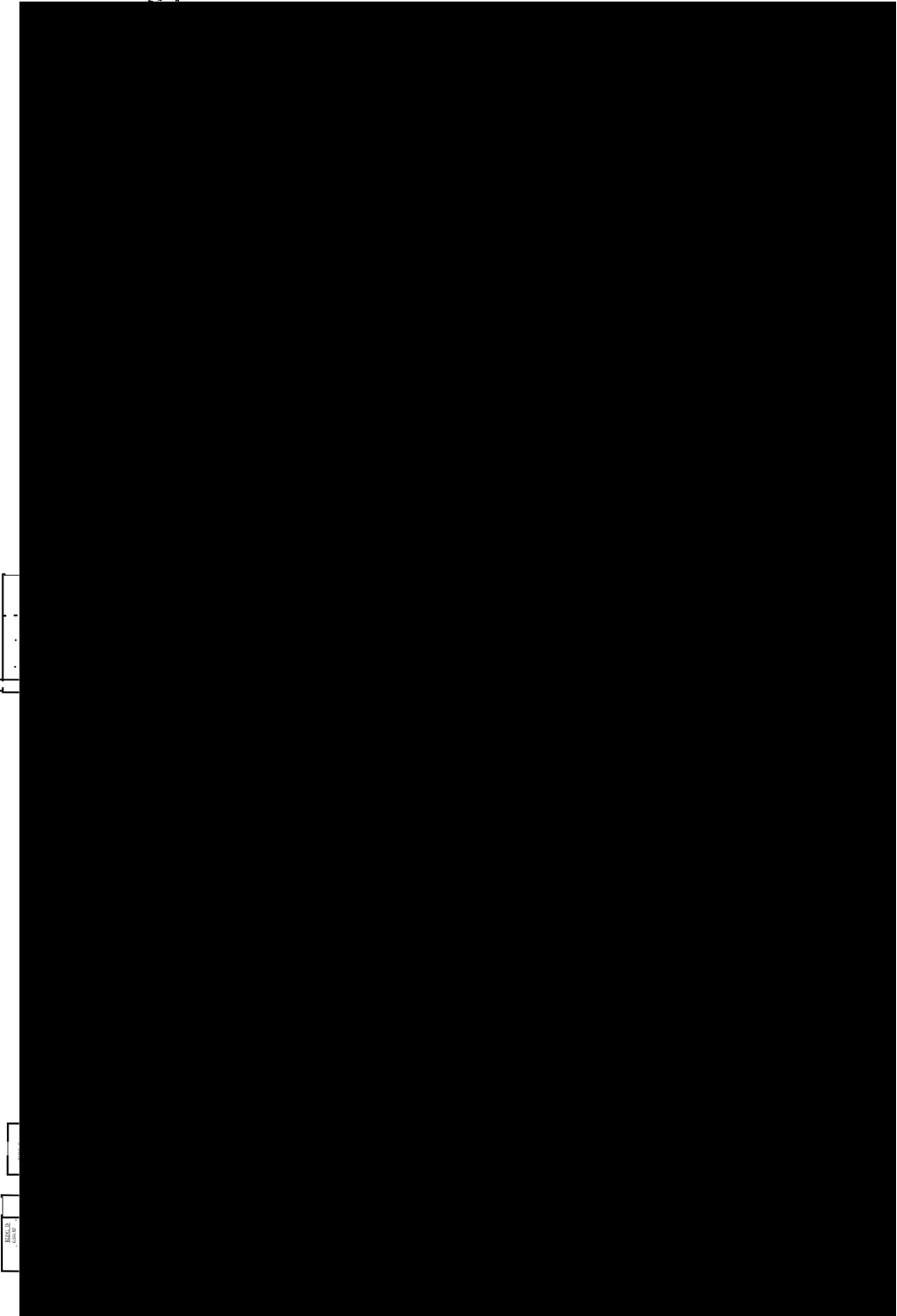
Remington Rand (1st Floor)  
SCALE: 1/8" = 20'

Remington Rand  
Upgrades

180 Johnson Street  
Middletown CT, 06457

BUILDING  
UPGRADES

BUILDING  
UPGRADES



- 201.1  
Building A:  
- Fix floors 510.0000  
- Upgrade windows - 1st Floor  
Building B:  
- Upgrade Windows - 1st & 2nd Floor  
Building C:  
- Upgrade Windows - 1st Floor

- 201.2  
Building A:  
- Get lock end of 1st floor  
- Upgrade window Door - End of  
- Upgrade window Door - End of  
- Deal with VOC issue in 1st floor  
- Lead asbestos 1st floor

- Building B:  
- New staircase in entrance  
- Lead asbestos throughout  
stair  
- Fix floor on 1st floor near  
elevator and midway

- Other Issues:  
- Known lead asbestos problems  
in occupied areas  
- Upgrade stairs wall  
- Elevator  
- Upgrade Freight  
- New Passenger  
- Upgrade bathrooms

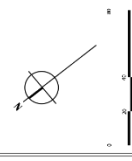
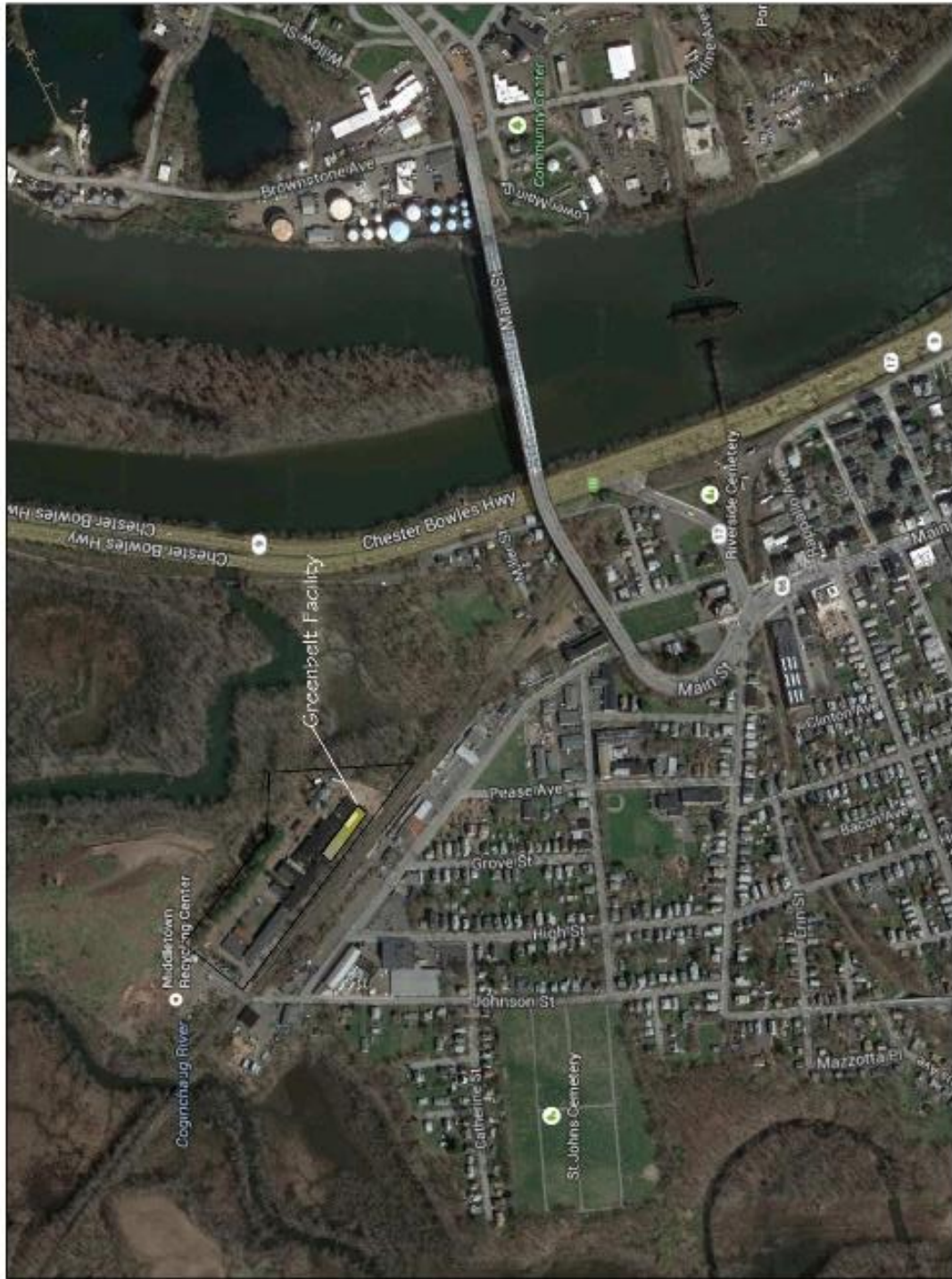




Figure 2: Site Location



Greenbelt Facility Site Location

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.

Office of the Secretary of the State of Connecticut

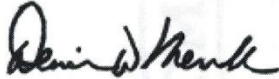
I, the Connecticut Secretary of the State, and keeper of the seal thereof,  
DO HEREBY CERTIFY, that articles of organization for

GREENBELT MANAGEMENT LLC

a domestic limited liability company, were filed in this office on December 21, 2012. The following is a list of all documents filed in this office:

Filing Type: -----	File Date/Time: -----	Effective Date/Time: -----
ARTICLES OF ORGANIZATION	December 21, 2012 01:00 PM	

Articles of dissolution have not been filed, and so far as indicated by the records of this office such limited liability company is in existence.



Secretary of the State

Date Issued: November 11, 2013

Business ID: 1093032

Longform

Certificate Number: 2013327443001

Note: To verify this certificate, visit the web site <http://www.concord.sots.ct.gov>

Greenbelt Management's facility is owned and managed by the local authority, City of Middletown. The lease details the requirements for Greenbelt Management to maintain the facility to City code and that any improvements must be approved by the Building Department:

Section 5.1- TENANT Repair Obligations.

Except as specifically provided herein, the TENANT agrees that from and after the date that the possession of the Demised Premises is delivered to the TENANT and continuously throughout the Lease Term, the TENANT will keep neat and clean and maintain in good order, condition and repair, the Demised Premises and every part thereof. The TENANT further agrees that the Demised Premises **shall be kept in a clean, sanitary and safe condition and shall in all respects comply with laws of the State and the ordinances of the City of Middletown and in accordance with all directions, rules and regulations of the Health Officer, Fire Marshal, Building Inspector and all other proper officers of the governmental agencies having jurisdiction over the Demised Premises.**

Section 5.2- TENANT'S Alterations and Improvements.

The TENANT shall not make any alterations, improvements and/or additions to the Demised Premises without first obtaining, in each instance, the prior written consent of the LANDLORD, which consent shall not be unreasonably withheld. LANDLORD agrees in advance to all alterations necessary by tenant to renovate and improve the facility as set forth in the attached document, Exhibit C. **TENANT shall also obtain a building permit and any other applicable construction permits, LANDLORD shall fully cooperate in assisting and expediting the TENANT in connection with obtaining all necessary and required permits, certificates of occupancy or certificates of completion from the City of Middletown Building Department.** LANDLORD shall fully cooperate and coordinate with the TENANT in obtaining access to the entire building, including those spaces presently occupied by other Tenants.

Department of Consumer Protection  
165 Capitol Avenue  
Hartford, Connecticut 06106-1630  
(860) 713-6100

November 14, 2013

Re: Greenbelt Facility  
180 Johnston Street, Bldg A, 2<sup>nd</sup> Fl  
Middletown, Connecticut

To Whom It May Concern,

Seventy2architects LLC has prepared construction documents, including plans and details, for the proposed renovation work at the second floor of Building 'A' at the Remington-Rand facility in Middletown, Connecticut. The existing building is Construction Type IIIB (masonry exterior walls, wood interior framing and roof) and is sprinklered throughout in compliance with NFPA13.

Proposed work includes demolition of dilapidated fire stairs and installation of Code compliant egress stairs at remote ends of the facility. The new interior stair will be protected by new fire-rated shaft walls. Handrails, treads and risers at both stairs shall comply with Code. Emergency lighting and exit signs will be provided throughout the space. Gender-specific accessible toilet rooms are provided with non-required accessible showers. All doors are minimum 36" width, hardware shall be lever-handset type or push/pull as appropriate: no knobs are to be used. Hallways are in excess of required clear width.

All proposed work is in compliance with local, state and federal Building Codes, Fire Codes, Mechanical, Electrical and Plumbing Codes, and Energy Codes.

I, Maura Newell Juan, am Project Architect for this proposed renovation work. I am a licensed Architect in Connecticut, and am also a licensed Building Official with the State of Connecticut.

Yours truly,



Maura Newell Juan, AIA  
Principal Architect

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



**City of Middletown**

DEPARTMENT OF PLANNING, CONSERVATION & DEVELOPMENT  
245 deKoven Drive Middletown, CT 06457

Department of Consumer Protection  
State of Connecticut

To Whom It May Concern:

Please be advised that on October 4th, 2013, after obtaining approval from the Middletown Common Council and the Planning and Zoning Commission, Greenbelt Management, LLC (hereafter referred to as the tenant) entered into a lease option agreement with the City of Middletown (hereafter referred to as the "landlord") which grants the tenant right to execute a five year lease for 15,000 square feet of space in the city owned Remington Rand Building at 180 Johnston Street, Middletown, CT 06457. The potential also exists for tenant to increase the leased area by another 15,000 square feet within the existing building, subject to Landlord and City Council approval. Execution of the lease is contingent upon receiving a medical marijuana production license from the State Department of Consumer Protection. The terms of the lease make provision for the landlord's access to the tenant's premises to be restricted to whatever extent necessary to allow for the tenant to remain in compliance with the regulations set forth by your department pertaining to medical marijuana production facilities. Should the tenant obtain a license from your department and execute the lease, the tenant will have the landlord's express consent to develop and operate a compliant medical marijuana production facility on the leased premises.

Sincerely

A handwritten signature in black ink, appearing to read "William Warner".

William Warner, AICP  
Director of Planning and Development

TEL: (860) 638-4840 FAX: (860) 638-1940  
WEBSITES: [www.middletownct.gov](http://www.middletownct.gov) [www.middletownplanning.com](http://www.middletownplanning.com)

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



Dimensions: 16.0" High x 18.0" Wide

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.

Surrounding Land Use

The Site is bordered to the Northwest by the City of Middletown Municipal Landfill, to the north and east by undeveloped wetlands and the Mattabeset River beyond, and to the south and west by the Providence and Worcester Railroad and several industrial/commercial businesses beyond.

Surrounding Tenants

The Site is an industrial building complex with identical architectural types on the site. Tenants include (or may have included):

BLDG	Tenants	Type
M	All Purpose Flooring	Carpet, hardwood, laminate flooring
K	Brown & Wimler	General carpentry
J	Chop Shop LLC	Metal working
a 1st	Clayton Bait	Storage of fishing bait
G	Coughlin Service Corp.	General carpentry / property management
Outbuilding	Lenz Landscaping Service	Landscaping / grounds maintenance
I	Fat City Cycle	Manufacture of custom motorcycles / auto body
C 2nd	ID Mail	Manufacturer of high mailing machines
F 1st	Innovative Delivery Services, LLC	Bulk mail distribution
C	Labella Painting	Painting contractor
D	Maurizio D'Amico - MD Lawncare	Landscaping / grounds maintenance
F 2nd	KO Fitness	Boxing / physical fitness

BLDG	Tenants	Type
A 1st.	Odd Fellows Playhouse	Storage of props
J	The Refuge	Weight lifting, tactical training for area police departments
C 1st	Rabid Fitness	Crossfit physical fitness center
E	Stacy Stucco	General contractor
C 1st	Zen Roasters Coffee	Coffee Roasters
C 1st	Allans Abatement	lead and asbestos abatement
A-J Lot	Greenskies	storage of solar panels
N	Trinity Power Washing	warehouse
A 1st	Middletown Parking Authority	storage
B 1st	Sow Fresh	Organic grocery delivery
B 1st	Forest City Brewing	Beer Manufacturer
B 1st	Whey Station	Food production
A 1st	Stubborn Beauty Brewing	Beer Manufacturer



Figure 4: Greenbelt Management Facility



Figure 5: All Purpose Flooring



Figure 6: Stubborn Beauty Brewery



Figure 7: Zen Coffee Roasters

The Block Immediately South and West of 180 Johnson Street Complex:

The block immediately south and west of the railroad that isolates 180 Johnson Street is characterized by a mix of vacant lots and commercial or industrial properties including:

Occupant	Lot Number	Address
Middlesex Ice Control	19-0093	175 Johnson Street
Lot	19-0025	North Main Street
Lot	20-0110	North Main Street
Untouchable Towing	20-0109	170 North Main Street
O&G/Stone Depot	20-0106-08	120 North Main Street



Figure 8: Landfill



Figure 9: OG Stone Depot



Figure 30: Middlesex Ice Control



Figure 11: Middlesex Ice Control



6. A site plan drawn to scale of the proposed production facility showing streets, property lines, buildings, parking areas, and outdoor areas, if applicable, that are within the same block as the production facility.



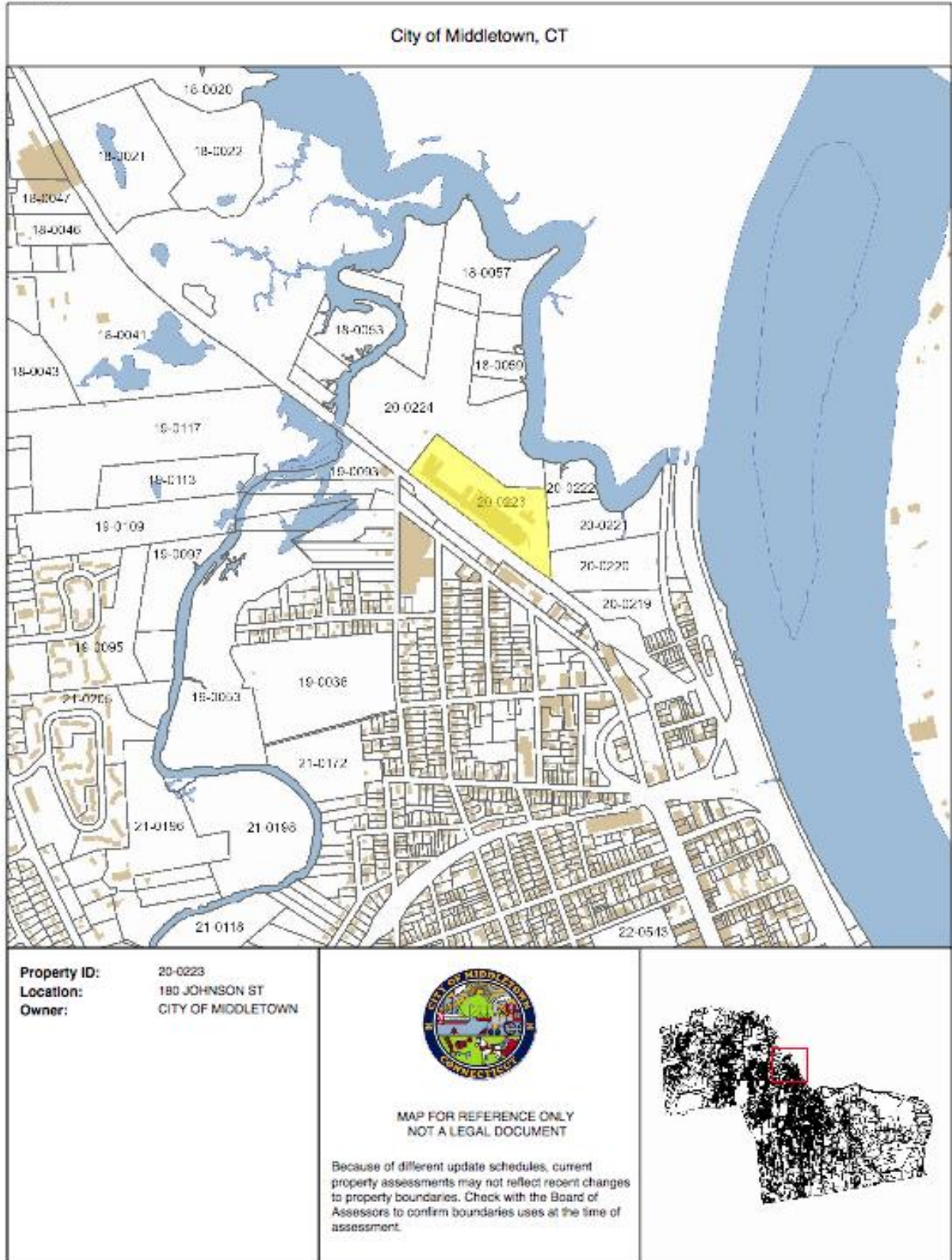


Figure 13: Location Map

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.

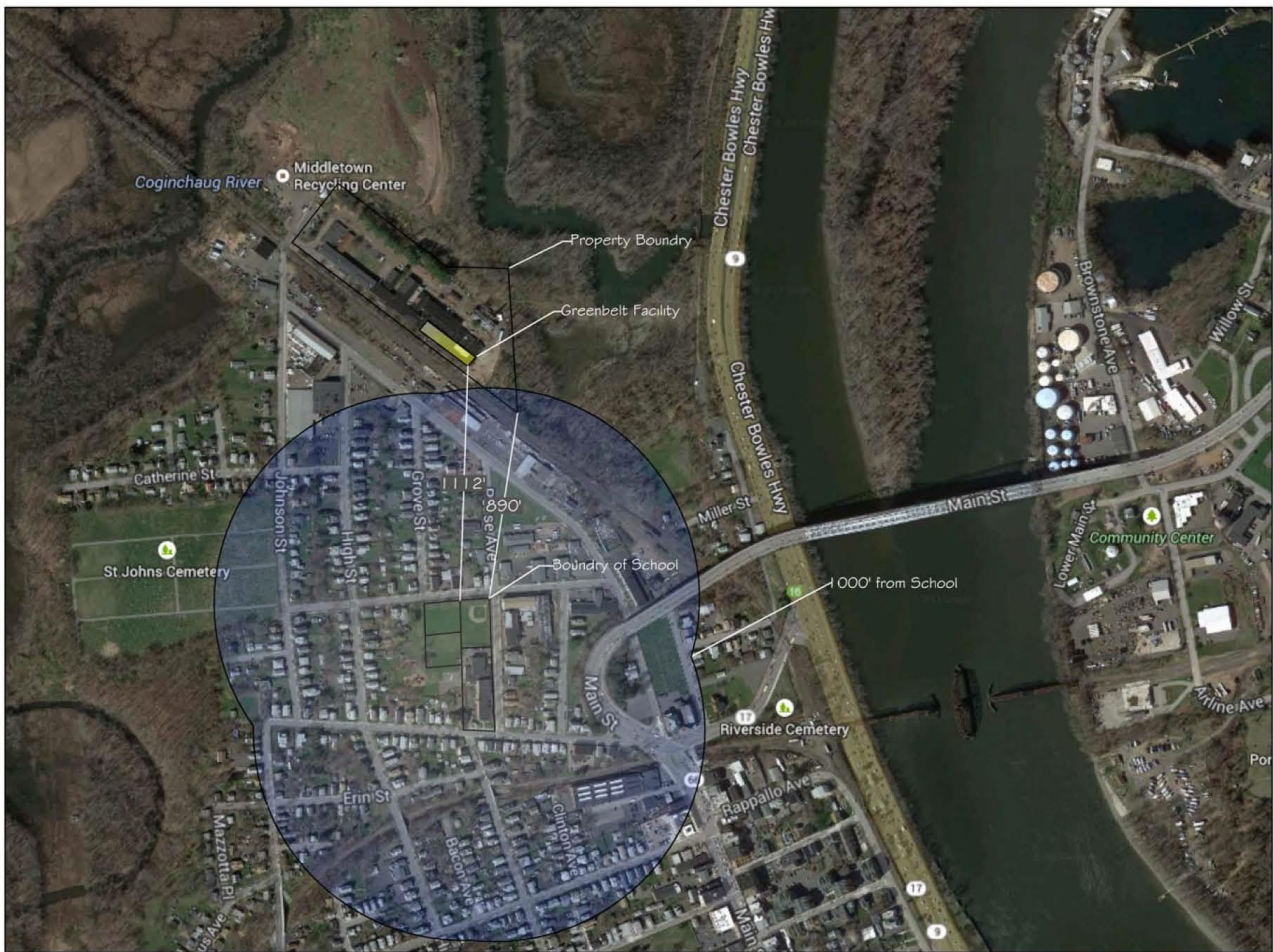
Greenbelt Management has not identified any places registered as being used primarily for religious worship, public or private schools, convents, charitable institutions, hospitals or veterans' homes or any camps or military establishments within 1,000 feet of the proposed production facility as depicted in Figure 14. The northern property line of McDonough Middle School's baseball diamond, which is the only such type of place identified in the neighborhood in proximity to 180 Johnson Street, is at minimum 1,100 feet as the crow flies from Greenbelt Management's proposed facility, as seen in Figure 15.



1 000 LF Radius from Greenbelt Facility

500 LF

Figure 14: 1,000 ft. Radius from Facility



1 000 LF Radius from Mac Donough  
Elementary School and Baseball Field

500 LF

Aerial view from Google Maps

Figure15: 1,000 ft. from Elementary School

8. A blueprint, or floor plan drawn to scale, of the proposed production facility.



**SEVENTY2**  
ARCHITECTS  
240 MAIN ST, 4TH FLOOR DANBURY, CT 06810  
(203) 798-8252 (203) 791-0089

**PROJECT:**  
GREENBELT FACILITY  
REMINGTON-RAND  
BUILDING, 2ND FL  
MIDDLETOWN, CT

**ISSUED FOR PERMIT  
& CONSTRUCTION**



NO.	REVISION	DATE
1	ROOM NAMES	11/04/09

**SHEET TITLE**  
CODE REVIEW

**SCALE**  
AS NOTED  
**DATE**  
NOVEMBER 8, 2013  
**SHEET NO.**  
A0

# GREENBELT FACILITY AT REMINGTON-RAND 180 JOHNSTON STREET BUILDING 'A' / SECOND FLOOR MIDDLETOWN CT 06457

## IEBC 2003 W/2009 CT AMENDMENTS

**GENERAL INFORMATION**  
EXISTING BUILDING TYPE: CONSTRUCTION, F.I. USE  
OCCUPANT LOAD/FLOOR EGRESS = 13,360 SF/100 = 140 PEOPLE  
TOILETS: ONE TOILET PER GENDER PROVIDED.

**CHAPTER 7 - LEVEL 3 ALTERATIONS**  
701 MUST ALSO COMPLY WITH CHAPTER 4 & 5.  
702 NO SPECIAL USE IS PROPOSED.  
703.1 EXISTING SHIFTS SHALL BE ENCLOSED.  
NOTE: AT THE EXISTING EXIT STAIR, DAMAGED STAIRS SHALL BE REPAIRED AND NEW STAIRS SHALL BE CREATED AND NEW STAIRS INSTALLED.  
703.3 INTERIOR FINISHES SHALL COMPLY WITH IBC CHAPTER 8.  
704.1 FIRE PROTECTION SPRINKLERS ARE PROVIDED.  
704.2 FIRE ALARM SYSTEM SHALL BE PROVIDED.  
705 ALL NEW ELECTRICAL SYSTEMS SHALL BE PROVIDED.  
706 ALL NEW OR ALTERED WORK SHALL COMPLY WITH CHAPTER 5.  
707 SEE STRUCTURAL DRAWINGS.

**CHAPTER 6 - LEVEL 2 ALTERATIONS**  
603 MEANS OF EGRESS:  
NUMBER OF EXITS SHALL COMPLY WITH IBC CHAPTER 10.  
TWO EXITS SHALL BE PROVIDED FOR EACH SCOPE OF WORK.  
608 ALL NEW ELECTRICAL WORK SHALL COMPLY WITH IBC 2003.  
609 ALL MECHANICAL WORK SHALL COMPLY WITH IBC CHAPTER 9.  
610 ALL FINISHING WORK SHALL COMPLY WITH IBC CHAPTER 8.

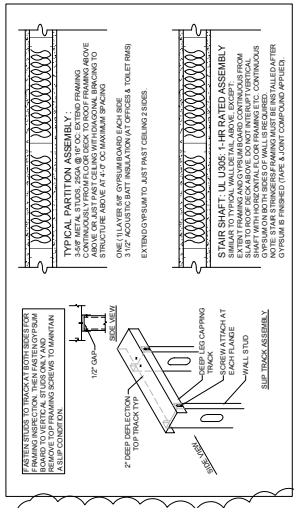
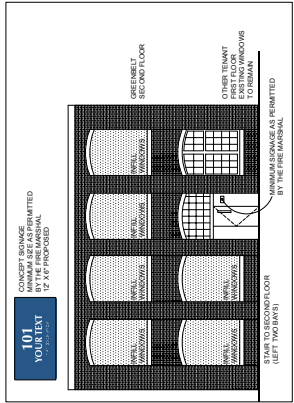
**CHAPTER 5 - LEVEL 1 ALTERATIONS**  
501 NEW WORK SHALL NOT BE LESS SAFE THAN EXISTING BLDG.  
504 ACCESSIBILITY ALTERED WORK SHALL COMPLY:  
ACCESSIBLE ENTRANCE SHALL BE PROVIDED.  
ACCESSIBLE TOILET ROOMS SHALL BE PROVIDED.  
DOORS SHALL BE 3' 0" WIDE W/ LEVERS.

**IBC 2003 W/2009 CT AMENDMENTS**  
USED ONLY AS REQUIRED BY IBC.

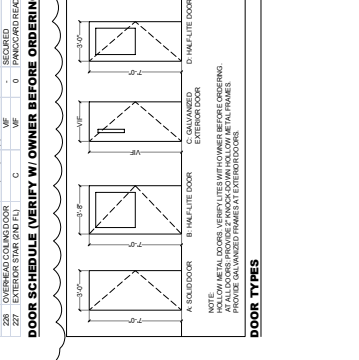
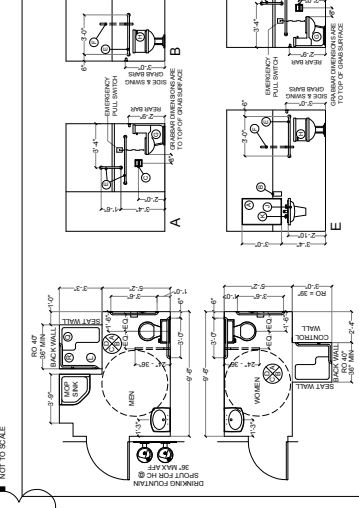
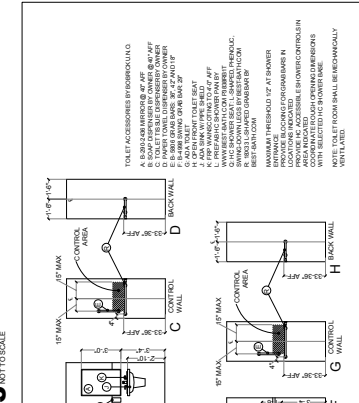
**CHAPTER 8 - INTERIOR FINISHES (PER IBC 603)**  
802.3 Interior Wall and Ceiling Finishes shall comply with IBC 603.  
Table 803.3 Interior Wall & Ceiling Finish Requirements by Occupancy Use Group  
C - PROPOSED  
804.3 Interior floor finishes comply with IBC 603.1, 2nd Ed.

**CHAPTER 10 - MEANS OF EGRESS (PER IBC 605)**  
1001 Means of Egress shall be illuminated at least 1 foot-candle.  
1007.1 Accessible spaces shall be served with rail less than one accessible width of egress.  
1008.1.1 Door width shall provide at least 32 inches clear between door and door frame.  
1011 Height of doors shall not be less than 80 inches.  
1041 Exit signs shall be internally or externally illuminated.  
1042 TWO EXITS ARE PROPOSED.  
1016 DEAD ENDS SHALL NOT EXCEED 50 FEET (SPRINKLERED)

**CHAPTER 11 - ACCESSIBILITY (PER IBC 606)**  
ALL NEW WORK SHALL BE ACCESSIBLE DOOR CLEARANCES ARE INDICATED ON DRAWINGS.



DOOR NO.	DOOR TYPE	SIZE	BUILDING REQUIREMENT
101	INTERIOR STAIR (1ST FL)	3'-0" x 7'-0"	45 MIN. FRAMING
102	INTERIOR STAIR (2ND FL)	3'-0" x 7'-0"	45 MIN. FRAMING
103	FRONT ENTRANCE	3'-0" x 7'-0"	0 - PASSAGE
104	PRODUCT MANUFACTURER	3'-0" x 7'-0"	0 - PASSAGE
105	VESTIBULE	3'-0" x 7'-0"	0 - PASSAGE
106	SECURITY OFFICE	3'-0" x 7'-0"	0 - OFFICE LOCK
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## Greenbelt Management - Production Capacity Estimate

1. Provide a proposed business plan that shows the applicant's expected production capacity, including any ability of the applicant to expand capacity within the approved production facility.

### Demand and Yield Estimation

Greenbelt Management's internal production capacity estimates are based on an analysis of several input factors including:

- 1) cultivation area;
- 2) lighting density;
- 3) CO<sub>2</sub> levels;
- 4) average yield of brands produced;
- 5) fertilizer application regiments;
- 6) number of harvest cycles; and
- 7) labor skill level.

Our analysis results are somewhat comparable with published research on marijuana yields. Greenbelt anticipates production of 320 pounds per harvest cycle with 5.2 cycles per year. Manufacture of infused products is estimated to produce monthly 1,500 units of various infused products with an average net package content of 250 mg of THC. A 2010 RAND study cites research from commercial production in the Netherlands finding a median plant density of 1.4 plants per square foot will produce an average yield of 1.2 ounces of saleable materials per plant per harvest. This is equivalent to 0.105 pounds per square foot per harvest or 2.625 pounds per 25 square feet per harvest.<sup>1</sup> Greenbelt Management estimates production that is less than the RAND figures at .05 pounds per square foot of total cultivation area per harvest compared to 0.105. The cause of the variance in yield in the Greenbelt Management analysis is based on both a conservative estimation bias and our assessment of the requirements for the production of low-environmental impact pharmaceutical grade cannabis.<sup>2</sup>

The operation will employ 42 metal halide fixtures in propagation and vegetative spaces. The flowering areas of the facility will house 256 high pressure sodium fixtures in four separate cultivation bays. A hybrid cultivation system will be implemented utilizing an organic media and soil mix. A sustainable coco base is used for all vegetative and flowering plants. Feedings schedules are designed so that nutrient from the soil and organic fertilizers are taken up

<sup>1</sup> Caulkins, J. (2010). Estimated cost of production for legalized cannabis (RAND Working Paper WR-764-RC). Washington D.C.: RAND Drug Policy Research Center. Retrieved September 15, 2013, from [http://www.rand.org/content/dam/rand/pubs/working\\_papers/2010/RAND\\_WR764.pdf](http://www.rand.org/content/dam/rand/pubs/working_papers/2010/RAND_WR764.pdf)

<sup>2</sup> O'Hare, M., Sanchez, D. & Alstone, P. (2013). Environmental risks and opportunities in cannabis cultivation. (Botec Analysis Corporation I-502 Project #430-5d). Cambridge, MA. Retrieved September 15, 2013, from [http://www.liq.wa.gov/publications/Marijuana/SEPA/BOTEC\\_Whitepaper\\_Final.pdf](http://www.liq.wa.gov/publications/Marijuana/SEPA/BOTEC_Whitepaper_Final.pdf)

by the plant leaving only trace minerals remaining in the media. A drip table system and demand feeding schedule replaces traditional ebb and flow systems so that no wastewater is disposed to the municipal drainage system.

Greenbelt Management plans to establish operations upon licensing in a 15,000 square foot facility leased from the city of Middletown, Connecticut with an option for an additional contiguous 15,000 square feet. Based on a patient population analysis commissioned from BBC Research ([Exhibit C.1.](#)), the first phase of operations will begin with 9,600 total square feet of cultivation area. The third-party report estimates that 21,723 Connecticut residents will utilize the medical marijuana program. Americans for Safe Access estimates that patient populations tend to reach maturity in three to five years<sup>3</sup>. We estimate the ramp-up will occur more slowly than other states due to restrictive legislation.

Based on the factors discussed above and the current patient registration of 1,309 patients<sup>4</sup>, we estimate the patient base to be approximately 3,500 – 4,000 patients by the end of 2014. Based on analysis by our operations consultant, Denver Relief Consulting, and discussions with Americans for Safe Access staff<sup>5</sup>, we estimate a conservative average monthly demand from each patient of 30.5 grams or 1.1 ounces. As the development of alternative delivery methods advances, we expect that the use of raw cannabis flower will continue to contract with the increased use of vaporizer pens, transdermal patches, and other dose measured delivery systems. Utilizing the data we have with the advice of medical marijuana professionals, we anticipate the demand from 3,500 – 4,000 registered patients to be between 2,800 and 3,300 pounds annually.

#### Production Adjustments and Expansion

With estimated production of 1,660 pounds annually, Greenbelt Management expects to meet demand (assuming three licensed producers) and have sufficient inventory on hand in the event of an internal crop failure or higher than anticipated patient need. Additionally, the operation should be sufficient to meet demand if another producer fails to meet their production goals. Greenbelt understands that over-production is a security and diversion risk and will adjust production accordingly. Alternatively, production levels that do not meet patient demand can increase sales from unlicensed sources.

<sup>3</sup> Hunter, H. (2013, October 12). Telephone interview.

<sup>4</sup> Connecticut Department of Consumer Protection. Retrieved November 14, 2013, from [http://www.ct.gov/dcp/cwp/view.asp?a=4287&q=533228&dcpNav=|&dcpNav\\_GID=2109](http://www.ct.gov/dcp/cwp/view.asp?a=4287&q=533228&dcpNav=|&dcpNav_GID=2109)

<sup>5</sup> Hunter, H. (2013, October 12). Telephone interview

Understanding that production shortage or surplus is problematic to the company, the State and Department, and to patients, we have designed our production facility to easily adjust production as needed. Our leased space provides 15,000 additional square feet of useable production area that will allow Greenbelt to increase production with permission from the Commissioner very quickly (based on normal permitting and construction events). Our use of segregated cultivation bays allow us to scale back production by terminating operations in one or more bays.

Section Exhibits:

Exhibit C.1. – Patient Population Analysis

## Greenbelt Management – Product Offerings

a. A detailed description of all marijuana products intended to be offered by the producer during the first year of operation and, for each product, provide a sample of the proposed label and identify the type of packaging to be used.

Greenbelt Management will provide the largest selection of authorized pharmaceutical grade medical marijuana products available based on production capacity in the first year of operations. Our products and pricing plan establishes Greenbelt Management's policies on product development and compassionate pricing (Exhibit C.). Greenbelt Management will only produce products authorized by the Regulations of Connecticut State Agencies sections 21a-408-1 to 21a-408-70. Labeling and packaging will be provided in accordance with our packaging and labeling policies (Exhibit C.) which are compliant with regulations and child-resistant as set forth in the Poison Prevention Packaging Act of 1970 Regulations, 16 CFR 1700.1(b)(4). Specifications of packaging under consideration are provided. The following product mix will be produced in the first year of operations:

Raw material.

- Product description:

Raw Material: Greenbelt Management will produce raw medical marijuana for the purpose of inhalation through a vaporizing device or through smoking. Other methods of consumption, such as tinctures and suppositories, can take up to one hour to relieve symptoms, while inhaling vapor or smoke from medical marijuana is known to ease symptoms instantaneously. The effects of vaporizing or smoking medical marijuana are known to wear off quicker than that of other methods. For these reasons, Greenbelt Management believes it is an important option to make available to patients. Production of eight to ten strains of cannabis with a mix of THC:CBD ratios will result in approximately thirty-two to forty brands of raw material for patient selection.

- Label sample:


**RAW MATERIAL LABEL**

Greenbelt Management  
180 Johnson St.  
Middletown, CT. 06457

**Type:** Raw Cannabis  
[Registered Brand Name]  
[Satvia/Indica/Hybrid]  
[Lot and Batch #]

**Quantity of MMJ:** 00.00 (g)  
**Packaging Date:** [MM/DD/YYYY]  
**Expiration Date:** [MM/DD/YYYY]

**Instructions:** [List Instructions Here]



1234567890

**Testing Date:** [MM/DD/YYYY]  
**Cannabinoid Profile (%)**  
CBC: 00.00%  
CBD: 00.00%  
CBDA: 00.00%  
CBG: 00.00%  
CBN: 00.00%  
THC: 00.00%  
THCV: 00.00%

**Lab Rating:** [PASS or FAIL]

**Ingredients:** [List Ingredients Here]

**Allergens:** [List Allergens Here]

**KEEP OUT OF REACH OF CHILDREN**

2 in. (vertical dimension)  
3 in. (horizontal dimension)

- Packaging:

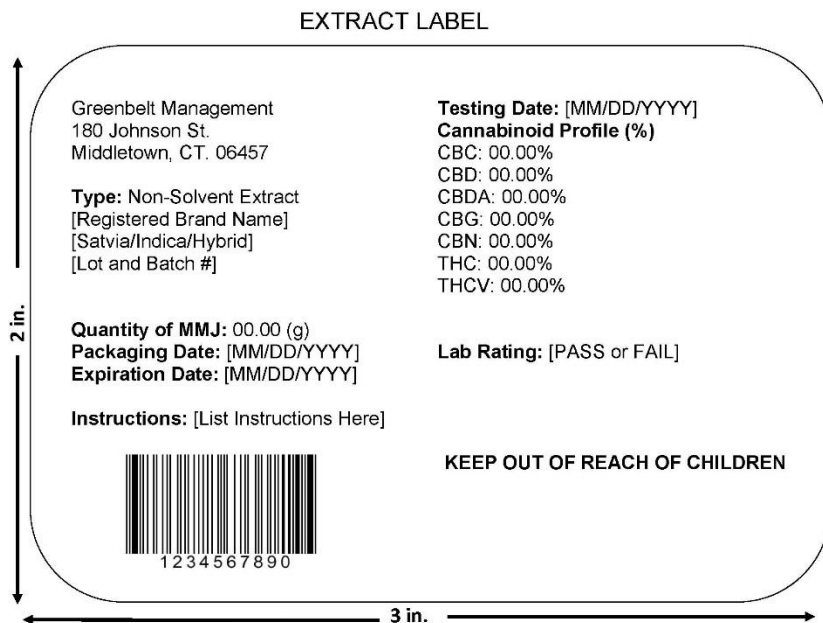
Raw material will be packaged in recycled plastic round pharmaceutical containers with re-closable child-resistant tops.

Extracts.

- Product description.

Extracts: Greenbelt Management will produce extractions for the purpose of manufacturing other consumables as well as the purpose of vaporizing and smoking. Using extractions to manufacture other consumables such as edibles, tinctures, and oils, decrease the volume of product needed to combine with other ingredients. For instance, the dosage amount in one gram of extract is easier to measure and combine with other ingredients than a quarter ounce of raw material. Additionally, extractions can be used as an inhalant by method of vaporizing or smoking. The effects of consuming extractions is known to be much stronger than the consumption of raw material. However, extractions can be used in much smaller quantities to reach the desired level of symptom relief. Extractions will be used to produce concentrates for sale and for further internal manufacturing.

- Label sample:



- Packaging:

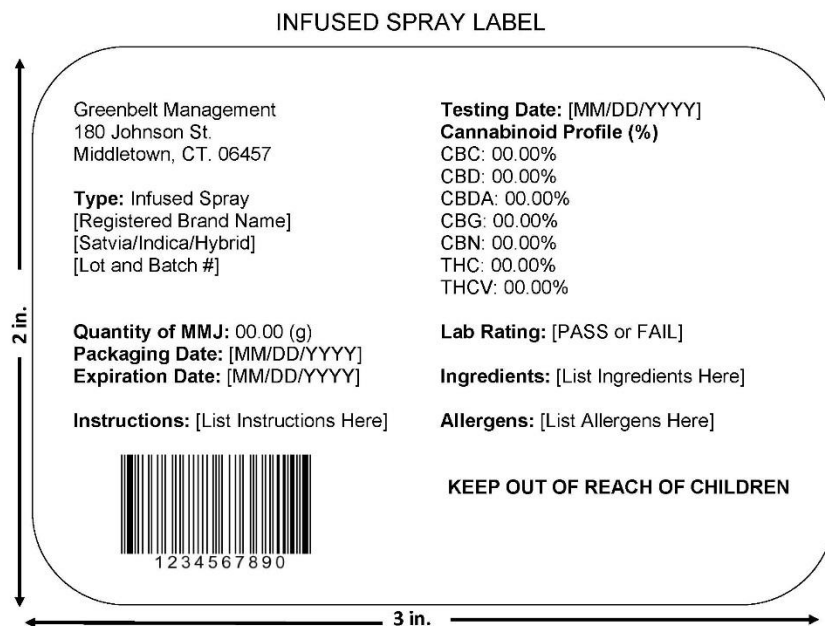
Extracts for sale will also be packaged in recycled plastic round pharmaceutical containers with re-closable child-resistant tops or placed in glass containers and packaged in a re-closable child-resistant pouch (Child Resistant Re-closable Easy Open (CRREO) pouch).

Sprays.

- Product description.

Spray: Greenbelt Management will produce medical marijuana infused sprays for the purpose of sublingual consumption. Spray is intended to be placed underneath the tongue where it is able to penetrate the thin layers of oral tissue and enter the bloodstream relatively quick. Spray is very useful for patients because it is known to produce light symptom relief while maintaining mental clarity. A line of spray products will be manufactured in two strengths to treat a variety of conditions in the first year of operations. Additional spray products will be developed in subsequent operating years.

- Label sample:



- Packaging:

Sprays cannot be packaged in a child-resistant atomizer. Therefore, sprays will be packaged in a re-closable child-resistant pouch (Child Resistant Re-closable Easy Open (CRREO) pouch).

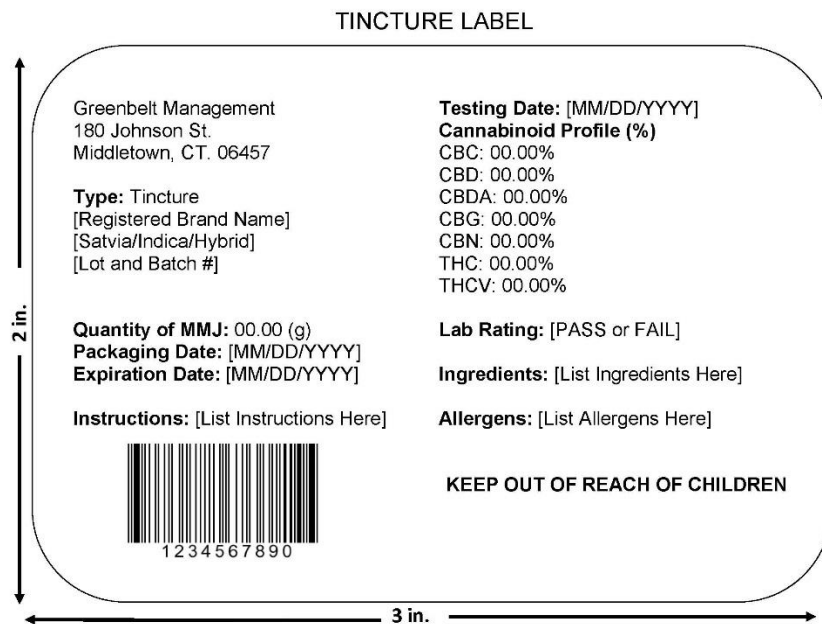


Tinctures.

- Product description.

Tinctures: Greenbelt Management will produce medical marijuana infused tincture for the purpose of sublingual consumption. Tincture is intended to be placed underneath the tongue where it is able to penetrate the thin layers of oral tissue and enter the bloodstream relatively quick. Tincture is very useful for patients because it is known to produce light symptom relief while maintaining mental clarity. Tinctures will be produced utilizing both alcohol and glycerin bases for patients with various dietary restrictions. A variety of single use dosing levels will be produced for sale to dispensaries.

- Label sample:



- Packaging:

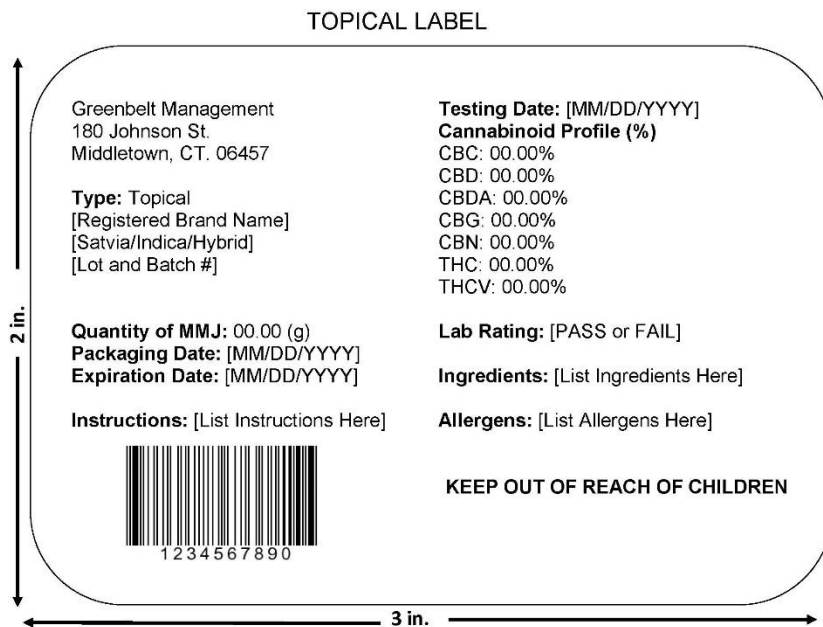
Tinctures will be packaged in single-use doses in child-resistant liquid blister packaging.

Topicals.

- Production description:

Topical: Greenbelt Management will produce topicals for the purpose of external application. Topicals such as lotions and salves are known to soothe muscle pain, stiffness, and soreness and offer a therapeutic method of consumption to medical marijuana patients. A line of topicals will contain lotions and salves in a variety of strengths to treat multiple conditions.

- Label sample:



- Packaging:

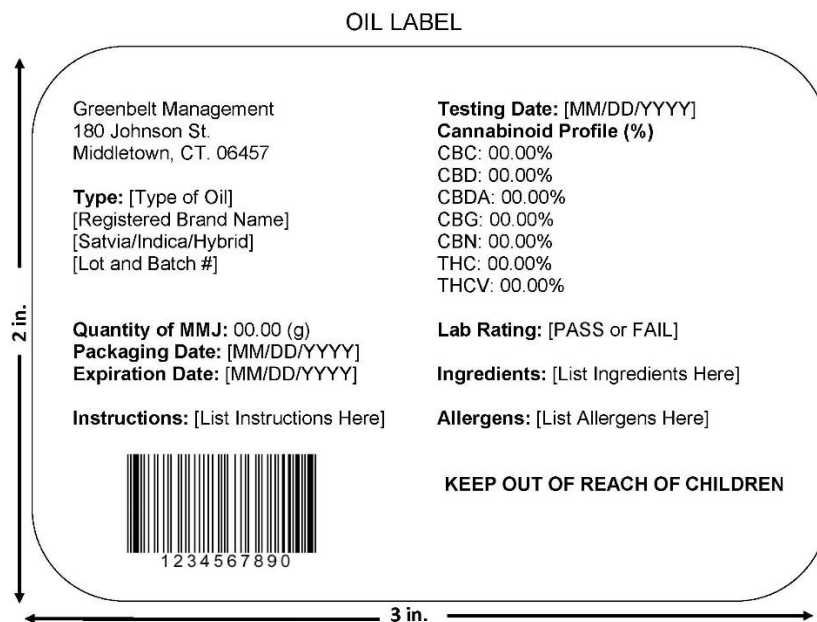
Topicals will be packaged in single-use child-resistant cosmetic blister packaging.

Oils.

- Product description:

Oil: Greenbelt Management will produce a variety of medical marijuana infused oils for the purpose of several delivery methods including combustion, vaporization, and as a food product ingredient. A high-CBD oil will be the focus of Greenbelt Management as recent research and anecdotal reports of efficacy for managing multiple conditions have increased patient demand in other medical marijuana states. Greenbelt will not produce food products, but will provide cooking oil products for home use by patients.

- Label sample:



- Packaging:

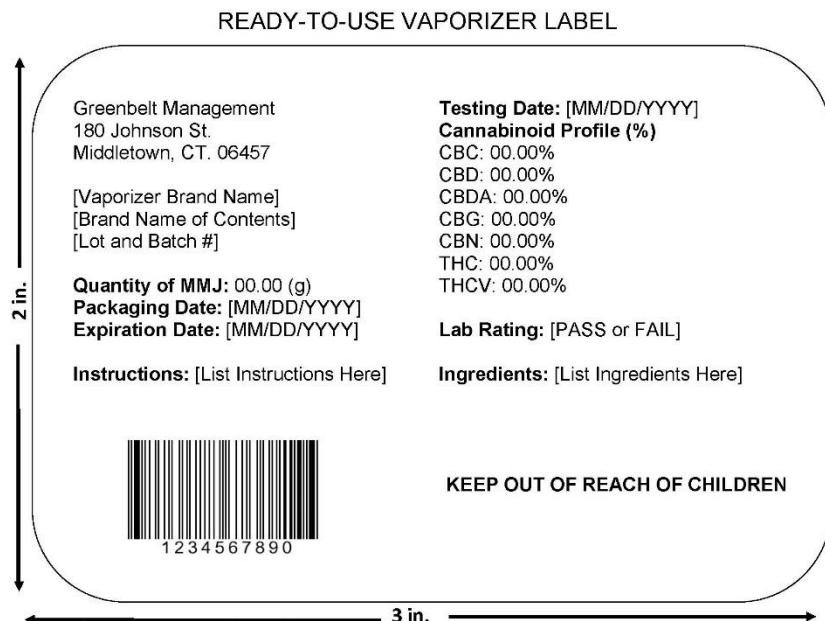
Oils will be packaged in an appropriate food grade container which will prevent spills and leakage and will be further packaged in a re-closable child-resistant pouch (Child Resistant Re-closable Easy Open (CRREO) pouch).

Ready-to-Use Vaporizers.

- Product description:

Vaporizer: Greenbelt Management will produce pre-filled cartridges of medical marijuana extractions or infused oil to be used with vaporizer pens. The vaporizer pen Greenbelt Management is working with allows patients to alter the dosage and volume of inhalations using a management software that connects directly to the vaporizer. This user-friendly software enables patients to obtain a desired level of symptom relief while reducing the risk of overuse. The contents of the vaporizer pen will be an oil extraction manufactured in Greenbelt's production facility and tested in a licensed laboratory. These vaporizer pens are ideal for patients needing the instant benefits of medical marijuana but do not want to smoke. The vaporizer pen releases the medicinal compounds of marijuana into a carcinogen-free vapor, eliminating the health risks of smoking. Greenbelt Management will continue to pursue measures like these to reduce substance abuse in Connecticut and the overuse of medical marijuana.

- Label sample:



- Packaging:

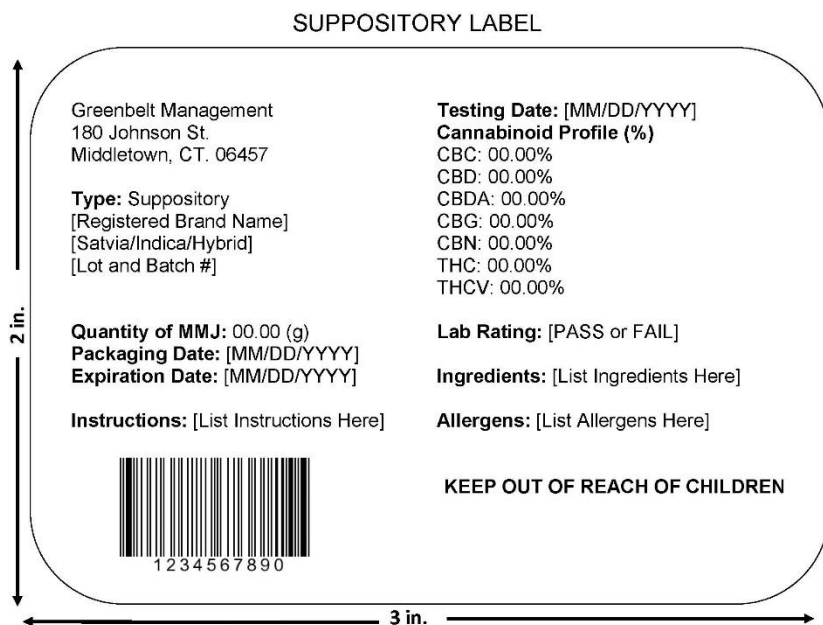
Oils will be packaged in an appropriate food grade container which will prevent spills and leakage and will be further packaged in a re-closable child-resistant pouch (Child Resistant Re-closable Easy Open (CRREO) pouch).

Suppositories.

- Product description:

Greenbelt Management will produce medical marijuana suppositories for the purpose of rectal consumption. The rectal route of consuming medical marijuana is known to have stronger and longer lasting effects than that of oral consumption. The use of suppositories is more common patients with strict dietary requirements or who are suffering from digestive disorders.

- Label sample:



- Packaging:

Oils will be packaged in an appropriate food grade container which will prevent spills and leakage and will be further packaged in a re-closable child-resistant pouch (Child Resistant Re-closable Easy Open (CRREO) pouch).

Section Exhibits:

Exhibit C. – Draft Products and Pricing Policies

Exhibit C. – Packaging and Labeling Policies

Manufacturer: Pactech LLC  
Model: Child Resistant Unit Dose Pouch  
ASTM Type: IVC

Description:

This is a flexible non-reclosable pouch (Figure1).



Figure 1

The package is opened by using a scissors to cut it open.

The manufacturer's instructions on the front of the pouch are (Figure 1):

Cut Here  
(a dashed line)

There are two different sets of instructions on the closure. One set of the manufacturer's instructions on the closure are (Figure 2):

(arrow pointing clockwise) CLOSE TIGHTLY (arrow pointing clockwise)

Protect Your Children!

(picture of hand signaling stop with two children's faces)

(arrow pointing counterclockwise) TO OPEN PUSH DOWN & TURN (arrow pointing counterclockwise)

Another example of the instructions are (Figure 3):



Figure 3

(arrow pointing clockwise) CLOSE TIGHTLY (arrow pointing clockwise)

(arrow pointing counterclockwise) TO OPEN PUSH DOWN & TURN (arrow pointing counterclockwise)

*Please note that Direct Mail Rx is a fictitious firm and the name was supplied for illustrative purposes.*

Manufacturer: O-I  
Model: Ultra-Loc  
ASTM Type: IA

Description:

This is a two-piece plastic/plastic continuously-threaded closure (Figure 1).



Figure 1

The closure is opened by pushing down on the closure and simultaneously turning it counterclockwise (Figures 2).



Figure 2



Manufacturer: Kerr Group Inc., (a subsidiary of Berry Plastics Corporation)  
Model: CR-III  
ASTM Type: IA

Description:

This is a two-piece plastic/plastic continuously-threaded closure (Figure 1).



Figure 1

The closure is opened by pushing down on the closure and simultaneously turning it counterclockwise (Figure 2). The side of the closure has uniform piping around its entire circumference.



Figure 2

The manufacturer's instructions on the closure are (Figure 2):

(counterclockwise arrow) PUSH DOWN & TURN  
CLOSER  
TIGHTLY  
TO OPEN (counterclockwise arrow)

holding the tab in, and rotating the actuator counterclockwise from the non-dispensing position (Figure 6A) until the actuator hole appears in the dispensing position (Figure 6B). The actuator is then pressed to dispense product. A series of six protruding ridges stick out too far to get past the plastic housing (see arrows in Figures 6A and 6B) and prevent the actuator from rotating too far clockwise or counterclockwise.



Figure 5



Figure 6A



Figure 6B

The manufacturer's instructions on the CR Mpak and Snap-on Dispensing System are the same. These instructions are below (Figures 5, 6A, and 6B):

(on the flexible tab on the side of the actuator in Figure 5)  
PUSH

(Figures 6A and 6B a triangle indicating the direction of the spray)  
PRESS  
LOCK  
(clockwise arrow)

The second version, the Snap-on Dispensing System (see Figure 3), involves the finger pump being permanently attached to a separate container after the package is filled. The Snap-on Dispensing System does not have a tamper-evident feature over the “U” shaped cut-out in the plastic housing.



Figure 3

There are 4 sets of double ridges inside the plastic housing located 90 degrees apart (indicated by the arrows inside the plastic housing on the left in Figure 4). These double ridges snap over a single continuous ridge on the bottle (see bottle on the right in Figure 4) to permanently secure the finger pump to the bottle.

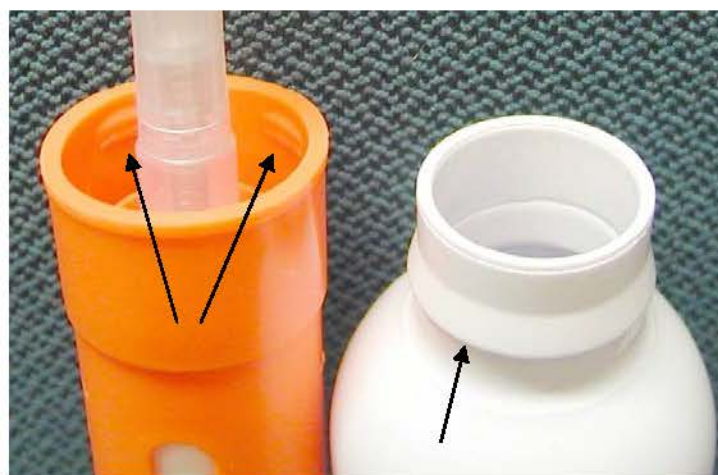


Figure 4

Both the MPak and Snap-on Dispensing System consist of a finger pump spray actuator that fits inside a plastic housing. The CR feature on both the MPak and Snap-on Dispensing System involves pushing a flexible tab on the side of the actuator (Figure 5),

Manufacturer: Packaging Concepts Assoc., LLC  
Model: Mpak, Snap-on Dispensing System  
ASTM Type: IXA(2)

Description:

There are two versions of this finger pump spray dispenser. The first version, the Mpak, is a one-piece package that incorporates the finger pump and the container body (see Figure 1A). The package is filled from the bottom and then a cap permanently seals the bottom of the package (Figure 1B). This version of the Mpak is available in two sizes.



Figure 1A



Figure 1B

The Mpak incorporates a tamper evident feature over the “U” shaped cut-out in the plastic housing (see arrow in package on right in Figure 2). The “U” shaped cut-out in the plastic housing is the position for the actuator to dispense product (see package on left in Figure 2).

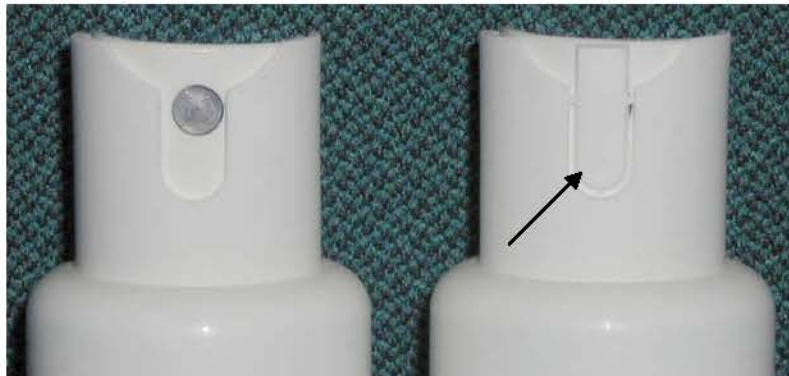


Figure 2

holding the tab in, and rotating the actuator counterclockwise from the non-dispensing position (Figure 6A) until the actuator hole appears in the dispensing position (Figure 6B). The actuator is then pressed to dispense product. A series of six protruding ridges stick out too far to get past the plastic housing (see arrows in Figures 6A and 6B) and prevent the actuator from rotating too far clockwise or counterclockwise.



Figure 5



Figure 6A



Figure 6B

The manufacturer's instructions on the CR Mpak and Snap-on Dispensing System are the same. These instructions are below (Figures 5, 6A, and 6B):

(on the flexible tab on the side of the actuator in Figure 5)  
PUSH

(Figures 6A and 6B a triangle indicating the direction of the spray)  
PRESS  
LOCK  
(clockwise arrow)

The second version, the Snap-on Dispensing System (see Figure 3), involves the finger pump being permanently attached to a separate container after the package is filled. The Snap-on Dispensing System does not have a tamper-evident feature over the “U” shaped cut-out in the plastic housing.



Figure 3

There are 4 sets of double ridges inside the plastic housing located 90 degrees apart (indicated by the arrows inside the plastic housing on the left in Figure 4). These double ridges snap over a single continuous ridge on the bottle (see bottle on the right in Figure 4) to permanently secure the finger pump to the bottle.

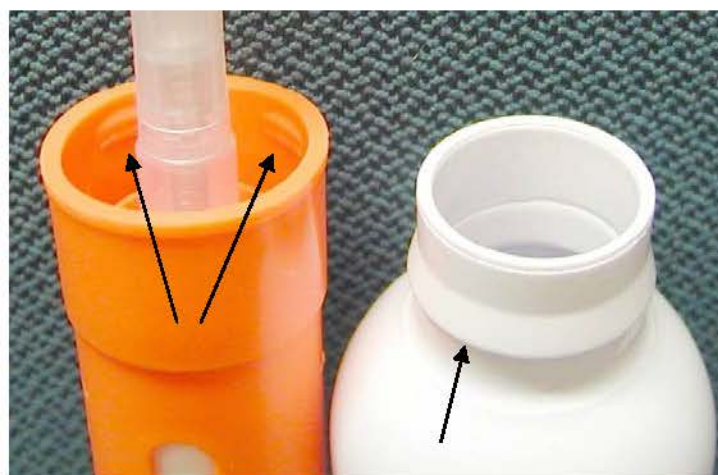


Figure 4

Both the MPak and Snap-on Dispensing System consist of a finger pump spray actuator that fits inside a plastic housing. The CR feature on both the MPak and Snap-on Dispensing System involves pushing a flexible tab on the side of the actuator (Figure 5),

Manufacturer: Packaging Concepts Assoc., LLC  
Model: Mpak, Snap-on Dispensing System  
ASTM Type: IXA(2)

Description:

There are two versions of this finger pump spray dispenser. The first version, the Mpak, is a one-piece package that incorporates the finger pump and the container body (see Figure 1A). The package is filled from the bottom and then a cap permanently seals the bottom of the package (Figure 1B). This version of the Mpak is available in two sizes.



Figure 1A



Figure 1B

The Mpak incorporates a tamper evident feature over the “U” shaped cut-out in the plastic housing (see arrow in package on right in Figure 2). The “U” shaped cut-out in the plastic housing is the position for the actuator to dispense product (see package on left in Figure 2).

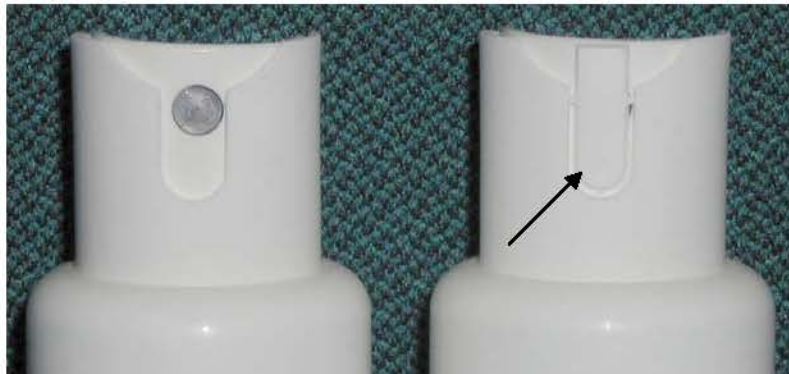


Figure 2

There are no manufacturer's instructions on either the PS 211 or PS 239 closure. The PS 194 has manufacturer's instructions, which are (Figure 5):



Figure 5

**PUSH** (two arrows at 45<sup>0</sup> are pointing at each side of the spout)





The snap closure is permanently attached to the container by continuous threads and matching ratchets on the closure and container (see arrow to ratchets on the closure and the bottle in Figure 3).

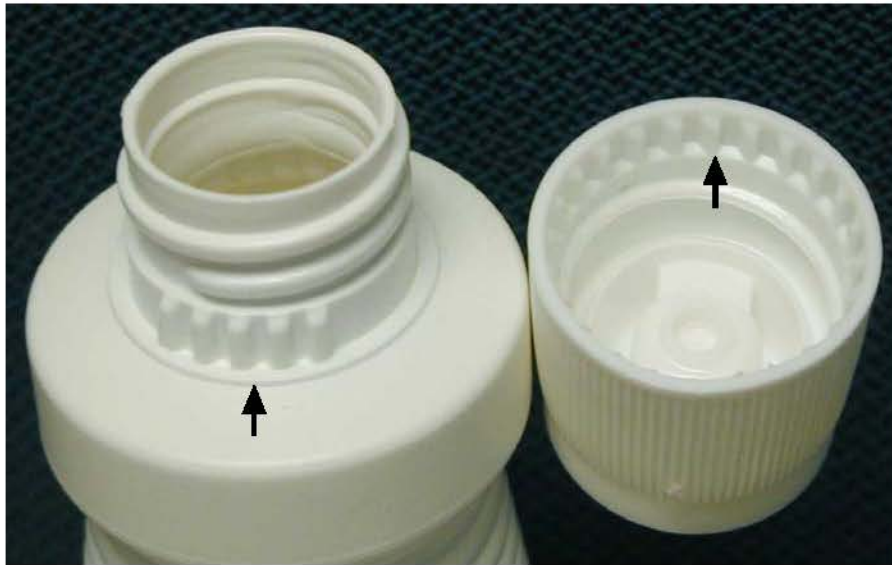


Figure 3

The closure is opened by pushing down on a groove between horizontal lines at the back of the spout (see arrows in Figure 4) and then lifting the spout up. The PS 211 (closure on right in Figure 4) and PS 239 (45° angle top closure on left in Figure 4) have horizontal lines on both the spouts and the back part of the closure top. The PS 194 (Figure 5) has horizontal lines on the spout only.

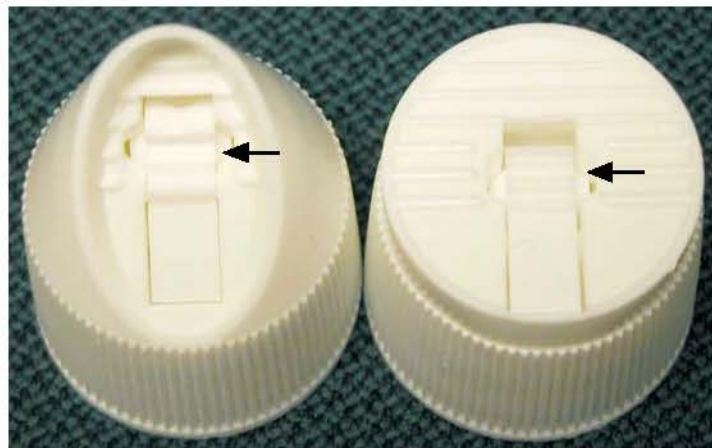


Figure 4

Manufacturer: Polytop Corporation  
Model: PS 211 (ToggLoc), PS 239 (Angle Face), PS194 (ToggLoc)  
ASTM Type: III D(1)

Description:

This is a one piece plastic snap closure with a dispensing spout (Figure 1). The closures shown in Figure 1 are from left to right, the PS 211 (a white flat top closure), PS 239 (a white 45° angle top closure), and PS 194 (a red flat top closure).



Figure 1

These closures can be fitted to either bottles (Figure 2A) or tubes (Figure 2B).



Figure 2A



Figure 2B

The manufacturer's instructions on the closure are (Figure 4):

PULL (inside a triangle)



Figure 4



Figure 2

The closure has a top part with a hole in it and a bottom part with a “T” shaped tab (see arrow in Figure 3) that locks into the hole. The closure is opened by pulling the tab forward so that the top of the “T” shape fits through the hole and simultaneously lifting up on a semicircular protrusion at the front on the top part of the closure. In the closed position, the “T” shaped tab from the bottom part of the closure locks into the hole on the top part of the closure (see top part of closure in Figure 3); the top part of the closure is down even with the bottom; and a plug from the top part fits into the small dispensing spout.

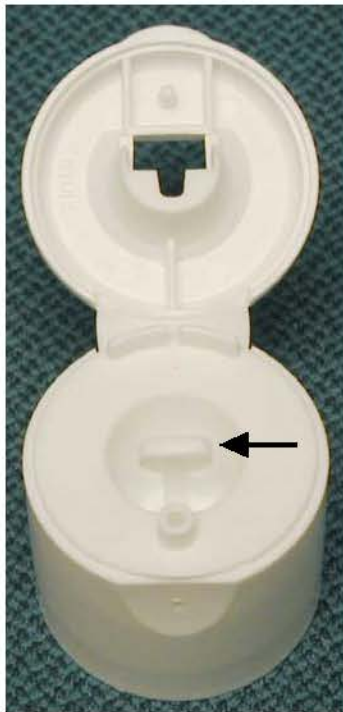


Figure 3

Manufacturer: Stull Technologies  
Model: StullSURE  
ASTM Type: III D

Description:

This is a one-piece plastic snap closure with a captive hinge (Figure 1). The closure has a top part that covers a small dispensing spout on the bottom part of the closure (see the opened closure on the right with the arrow pointing to the dispensing spout in Figure 1).

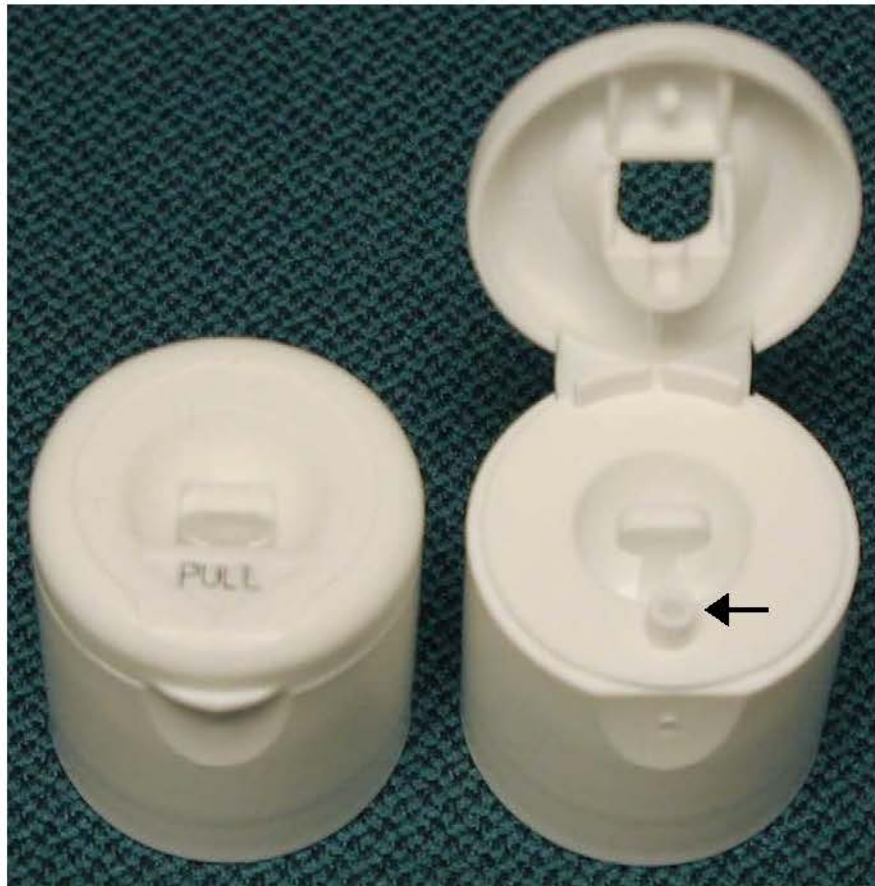


Figure 1

The closure is permanently attached to the container by pressing it onto the container, where it is held in place by a ridge on the inside of the closure (see arrow in Figure 2).

Manufacturer: Van Blarcom Closures Inc.  
Model: Dropper Closure  
ASTM Type: 1A

Description:

This is a two-piece plastic/plastic continuously threaded-closure with a dropper in the center of the closure (Figure 1A, B and C).



Figure 1 A



Figure 1B

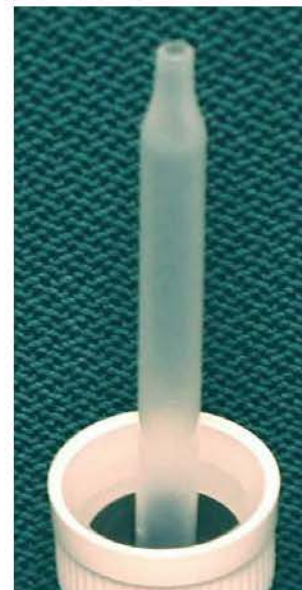


Figure 1C

The closure is opened by pushing down on the closure and simultaneously turning it counterclockwise.

The manufacturer's instructions on the closure are (Figure 1B):

-CLOSE TIGHTLY (arrow clockwise)  
TO OPEN PUSH DOWN & TURN (arrow counterclockwise)

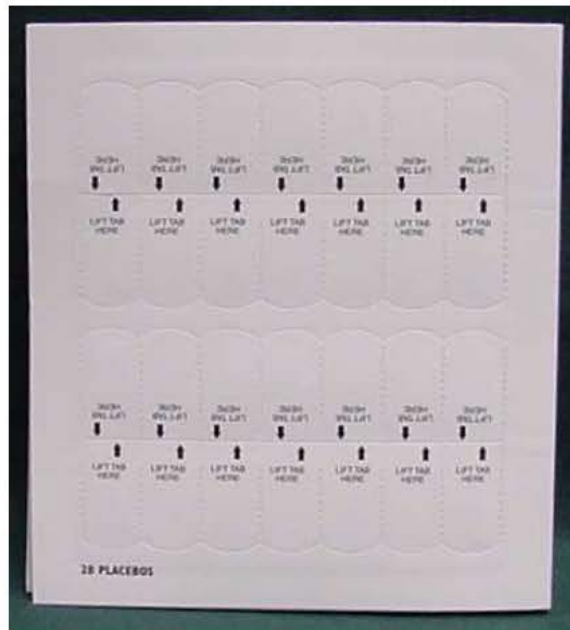


Figure 3



Figure 4

The manufacturer's instructions on the front of the card are (Figure 4):

#### INSTRUCTIONS

1. BEND PACK TO EXPOSE TAB
2. HOLD TAB AND DETACH
3. BEND PACK WHILE PUSHING ON CAPSULE

Manufacturer: Intini Marketing Inc.  
Model: Bend & Peel Blister Pack  
ASTM Type: VIII

Description:

This is a semi-rigid blister non-reclosable package. The front of the card covers each capsule with a clear semi-rigid plastic film (Figure 1) and the back of the card is a paper and foil combination (Figures 2 and 3).

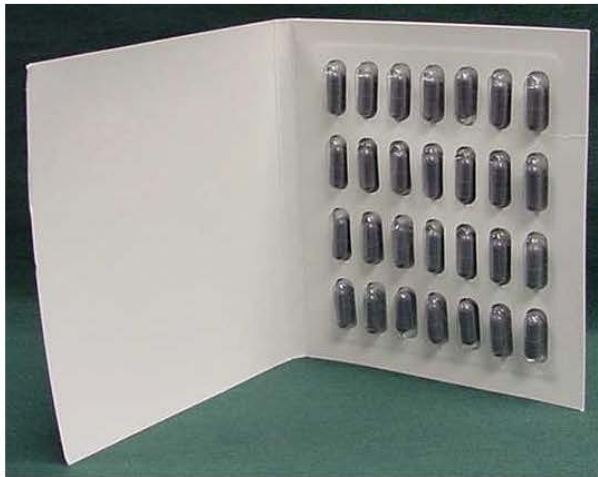


Figure 1

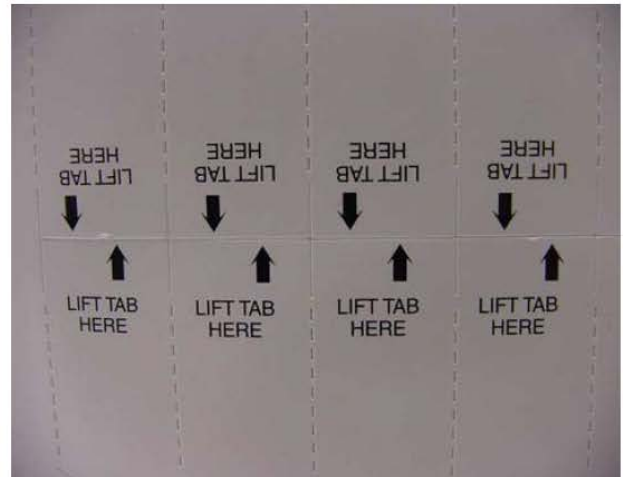


Figure 2

The package is opened by bending the back of the card along the line between the two tabs to expose the end of a tab (at the arrow in Figure 2 and Figure 3). Then the tab is grasped and detached from the back of the card (Figure 4), and the card is bent once more while pushing the capsule out the back of the card (Figure 4).



The manufacturer's instructions on the back of the blister card are (Figure 2B and Figure 3):

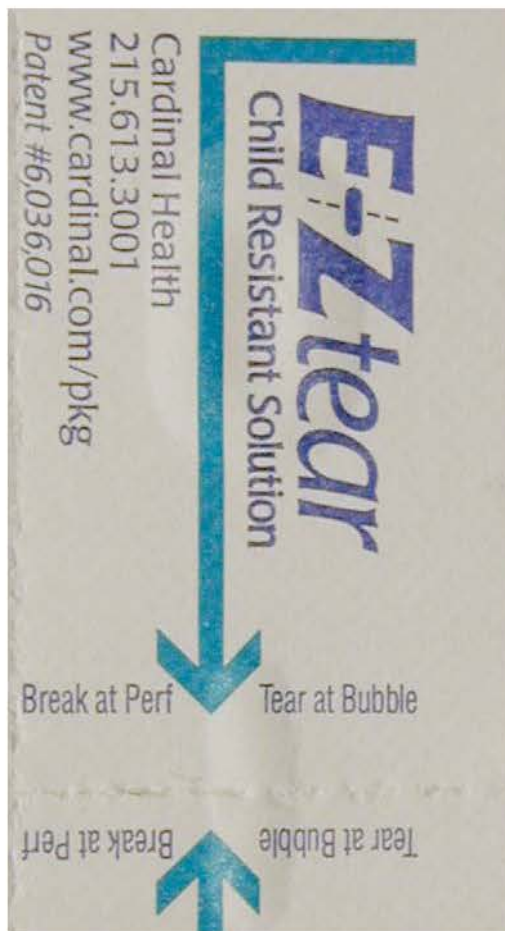


Figure 3

("L" shaped arrow pointing to center of blister where tear notch (bubble) is located)

E-Z tear

Child Resistant Solution

(perpendicular to "L" shaped arrow) Tear at Bubble      Break at Perf

Manufacturer: Cardinal Health  
Model: E-Z tear  
ASTM Type: VIII I

Description:

This is a semi-rigid blister non-reclosable package (Figure 1A). The front of the card covers each tablet with a clear semi-rigid plastic film (Figure 1B) and the back of the card is a paper and foil combination.



Figure 1A

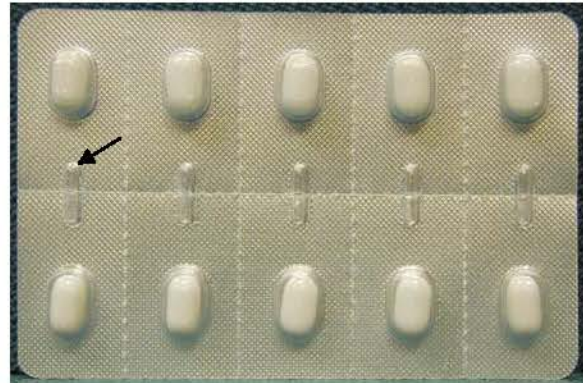


Figure 1B

The package is opened by folding at the perforation between two tablets where there is an internal (hidden) tear notch (see arrow in Figure 1B and Figure 2A), tearing the notch (bubble), and peeling the foil backing off the tablet (Figure 2B).



Figure 2A



Figure 2B

The package is closed by reversing the procedure, squeezing the two lever locks around the zipper tab, pulling the zipper tab into the lock aligning the hole in the zipper tab with the knob, pushing down, and then releasing the two lever locks.

The manufacturer's instructions on the front of the CRREO Pouch are (Figure 1):

#### How to Unlock Zipper

STEP 1. (picture of the zipper tab lifting off the knob and the two lever locks being squeezed in)

SQUEEZE ZIPPER  
LOCK LEVERS, LIFT  
METAL TAB AND  
PULL ZIPPER TO  
OPEN.

#### How to Lock Zipper

STEP 2. (picture of the zipper tab on the knob between the two lever locks)

SQUEEZE ZIPPER LOCK  
LEVERS, PULL ZIPPER  
TAB COMPLETELY INTO  
LOCK. ALIGN ZIPPER  
TAB HOLE OVER KNOB  
AND PUSH DOWN.

Manufacturer: Pactech LLC  
Model: CRREO Zipper Pouch  
ASTM Type: XIA

Description: This is a flexible reclosable pouch (Figure 1).



Figure 1

The CRREO zipper pouch package consists of a pouch with a zipper, a zipper tab, a knob, and two lever locks. The zipper tab has a hole in it that fits over the knob in the locked position. The package is opened by squeezing the two lever locks around the zipper tab, lifting the zipper tab off the knob, and pulling the zipper to open (Figure 2).

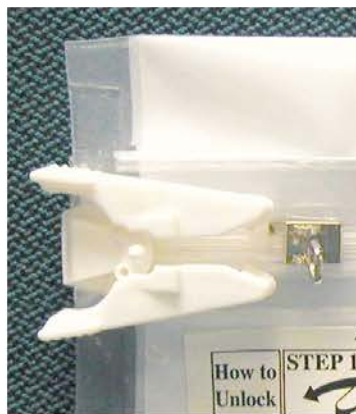


Figure 2

## Greenbelt Management – Facility Access and Security Plans

b. A detailed description of the process that the producer will take to ensure that access to the production facility premises will be limited only to employees.

Greenbelt Management has developed a robust security and access control plan ([Exhibit C](#)) built upon the expertise of our primary security provider, Kratos Public Safety & Security Solutions Inc. and Denver Relief Consulting. We utilize a multi-faceted approach in our security programs employing security policies and procedures that incorporate facility design features, equipment and surveillance, and policies and training in order to protect human, inventory, and physical assets. Additionally, because our facility is owned by the City of Middletown, the City will install a security camera viewing the entrance to the site complex which will be monitored by the police department. Greenbelt Management will install exterior cameras on the perimeter of the facility.

### Compliance with Regulations:

- All Greenbelt Management security policies and systems will comply with all regulations found in the Regulations of Connecticut State Agencies sections 21a-408-1 to 21a-408-70.

### Security Policies:

- Security policies will be regularly updated by management and security advisors.
- Management will maintain a close working relationship with the City of Middletown as the Greenbelt Management facility is City-owned property.
- Greenbelt Management will coordinate with Middletown law enforcement for: collaborative training and exercises, observation patrols, incident response, and informational meetings.
- All employees are required to undergo security training with semi-annual refresher trainings.
- Employees are required as a condition of employment to report any security issues immediately to management.
- All badge and identification issuance actions and visitor records will be maintained and stored for security purposes.

#### Facility Design Features:

- The facility is on the second floor of a commercial, industrial building providing an added layer of protection from burglary.
- The vault storage area is custom built for the use and the location by a Connecticut company located in Bethel.
- All limited access areas will be protected with biometric controls or electronic card access control with door access reporting capability.
- The facility will utilize mechanisms that permit employees to have secure views of their surroundings when working including convex mirrors, elevated vantage points, and strategic placement of work areas.

#### Identification Badge Policies:

- All persons in the facility must prominently display a color coded identification badge which indicated their access privileges. All employees are required as a condition of employment to report any deviation from this policy.

#### Robbery Prevention Procedures:

- Greenbelt Management will employ additional levels of security including robbery prevention protocols.
- Employees working on-site will vary working hours and lunch breaks to ensure maximum coverage.
- Two employees will be required for all facility opening and closing procedures.
- Employees will be trained in suspicious activity awareness techniques.
- All limited access areas will be cleaned regularly to remove old fingerprints.

#### Information Technology Security:

- Data security will be regarded as highly as physical security.
- The general manager will employ the services of an information technology contractor to manage the security of inventory control and security information systems.

#### Section Exhibits:

Appendix A - Kratos Security Plan

Exhibit C. - Draft Policies and Procedures

## Greenbelt Management – Air Treatment Systems

c. A detailed description of any air treatment or other system that will be installed and used to reduce off-site odors.

- Greenbelt Management will employ rooftop forced air cooling units in several different zones. The multi-zone design allows us to power down exhaust fans and systems in one area for maintenance, repair, and frequent filter replacements.
- Each unit serving cultivation, processing, and storage areas will utilize internal carbon filtration at the return point.
- The entire facility will be negatively pressured with an exhaust point at a high point in the rear of the facility which will use a carbon filter to scrub the exhaust.
- All area neighbors will be provided with contact information for the general manager who will investigate and respond to complaints within 24 hours.

## Greenbelt Management – Training and Continuing Education

d. A detailed description of the training and continuing education opportunities that will be provided to production facility employees.

Greenbelt Management is committed to the professional development of our staff. Turnover is costly in any industry, but the heavy training requirements for our operation provide us every incentive to retain our employees. All cultivation employees may participate in a master horticulturalist, or other related, certification program with approval from the general manager. Additionally, production employees may receive an equivalent tuition reimbursement for job related courses or classes (e.g. chemistry, production efficiency, etc.). In addition to professional training, we have intensive internal training programs as described in Exhibit C.2.d. A combination of training methods will be implemented including train-the-trainer methods, on the job training, and training by our consultants and advisors. Highlights of our planned training program include:

### **Authorized trainers.**

- Every employee must be trained by the general manager to provide new employee orientation and basic training modules to their co-workers.
- Specialized areas of training such as security or sanitation may be provided by outside resources including consultants or service providers.
- The general manager must ensure training content and presentations from outside trainers meet the needs and requirements of the company.

### **Module-based training.**

Greenbelt Management will implement a strategy of module based training. Each module covers a single topic in-depth. Training modules include:

- New employee orientation.
- Train the trainer.
- Monthly department meetings.
- Compliance, regulation, and law.
- Confidentiality.
- Facility safety.
- Facility security.
- Emergency and incident management.



- Inventory management and diversion prevention.
- Medical marijuana and plant science.
- Community and patient relations.
- Recordkeeping.
- Product handling and sanitation.

**Evaluation required.**

- Greenbelt Management’s training program is essential to achieving quality, efficient, and compliant production of pharmaceutical grade medical marijuana.
- The general manager shall evaluate the training program annually and based on the results of the evaluation, shall implement necessary changes and determine the need for re-training of staff.

**Staff feedback.**

The general manager shall solicit and record feedback on the quality and efficacy of a training module from staff which received the training. Feedback may be solicited utilizing the following methods:

- Post-training group discussions.
- Individual interviews.
- Anonymous surveys.

**Stakeholder feedback.**

The general manager will solicit and record feedback from dispensaries, consultants, community members, etc., about the competence of the company in the areas that the training program addressed. Feedback solicited from stakeholders should address the following:

- The quality of interactions with staff.
- Any changes in company policies or procedures directly affecting the stakeholder.
- The effectiveness of the company overall.
- Any changes in the way the company is perceived by the stakeholder.

**Observation and performance review.**

The general manager shall evaluate the effectiveness of training through observation of employee performance. These evaluations should consider:

- Adoption of policies, procedures, concepts, and attitudes presented in the training for new employees.

- Level of improvement and drive or lack thereof toward improvement in the performance of veteran staff.
- Adoption of the training topics in practice and how well they are working.
- Managers and trainer observations of staff attitudes, methods, and competency.
- The level of discussion between staff members and managers regarding training topics presented on an ongoing basis.

## Greenbelt Management – Anti-Diversion Controls

e. A detailed description of any processes or controls that will be implemented to prevent the diversion, theft or loss of marijuana.

The prevention of diversion by any means is essential to the operation and to the health and safety of Connecticut residents. Our anti-diversion policies have been informed by industry experts who have operated and consulted in facilities in several regulated jurisdictions. These policies are reinforced by the attentive and hands on owner-operator management structure. Greenbelt Management produces medical marijuana, which is a controlled substance with many incentives for diversion. Supply chain security is a top priority of Greenbelt Management and a primary job duty of all employees. Diversion includes, but is not limited to employee or third-party theft or unauthorized transfer or disposal of medical marijuana products by an employee. Best practice dictates that Greenbelt Management demonstrates control and security over our controlled substances inventory at all times. Greenbelt Management has a preliminary letter of intent with MJ Freeway to provide inventory control, but intends to confirm compliance with all regulations prior to installation. A summary of Greenbelt Management policies developed to prevent diversion include:

Accountability measures.

- The general manager is responsible for the development and implementation of the Greenbelt Management's anti-diversion policies.
- All Greenbelt Management employees and contractors are responsible for reporting incidents.
- Any employee who participates in, allows, or fails to report diversion may be reported to law enforcement and terminated from Greenbelt Management in accordance with the Standards of Conduct in the Employee Manual and regulations.

Restricted employee access to medical marijuana.

- No person that is discovered to have a history of theft or diversion based on a background check will be employed by the company.
- General manager approval is required for any inventory movements. Only the general manager shall have access to vault storage areas.

Employee diversion education.

- Each new employee must sign a written acknowledgement and be verbally advised by the general manager that diversion is a crime and as a condition of employment they are required to report any incident of diversion by the individual, a co-worker, or any other person.

Environmental scanning.

- The general manager shall regularly review information from external sources including Middletown law enforcement, trade and patient associations, advocacy groups, list serves, and dispensaries related to factors that may impact the incentive for diversion (e.g. system-wide marijuana shortages, changes in law, rapidly increasing patient registrations, etc.).
- If the general manager concludes there is a heightened risk of diversion based on environmental factors, a situational risk mitigation plan must be developed and implemented. The general manager shall consult with a third-party security advisor for additional recommended measures (e.g. employing use of a third-party transportation company for security).

Packaging and labeling.

- Medical marijuana products must be packaged in child-resistant packaging. Tamper-proof or tamper-evident packaging should be used whenever possible.

Inventory and reporting policies.

- Two employees, including the general manager on-duty, are required to record propagation activities, plant movement, or transfer to manufacturing any medical marijuana products in the inventory control system. Each employee must confirm with their signature the accuracy of an invoice or manifest, identification numbers, number of containers, the total inventory count received, and the accuracy of the entry of the inventory into the inventory management system or point of sale system.

Distribution of received medical marijuana products.

- Two employees including the general manager on-duty, are required to move inventory from the storage area to the packaging area for packaging and distribution. These employees must not be the same two employees which received the inventory to the location.

Storage of expired and wasted medical marijuana products.

- All marijuana awaiting disposal must be stored in a locked container, recorded, and disposed of in accordance with regulations.

Regular audits required.

- The performance of audits and inventory counts in accordance with the company's compliance and audit, and disposal policies.
- The general manager must ensure a quick resolution of discrepancies and errors.
- The general manager shall perform a periodic review of system administrators and responsible personnel to prevent diversion opportunities.
- Audit procedures must ensure a real-time inventory is available from the inventory control system in each area, as a minimum requirement.
- Any inventory discrepancies discovered by any employee must be reported to the general manager upon discovery. Any discrepancies discovered during a shift must be resolved before the end of the shift.
- The general manager must monitor unresolved inventory discrepancies on a daily basis, approve and document the reconciliation entry of any inventory discrepancy.

Inventory Management System Requirements.

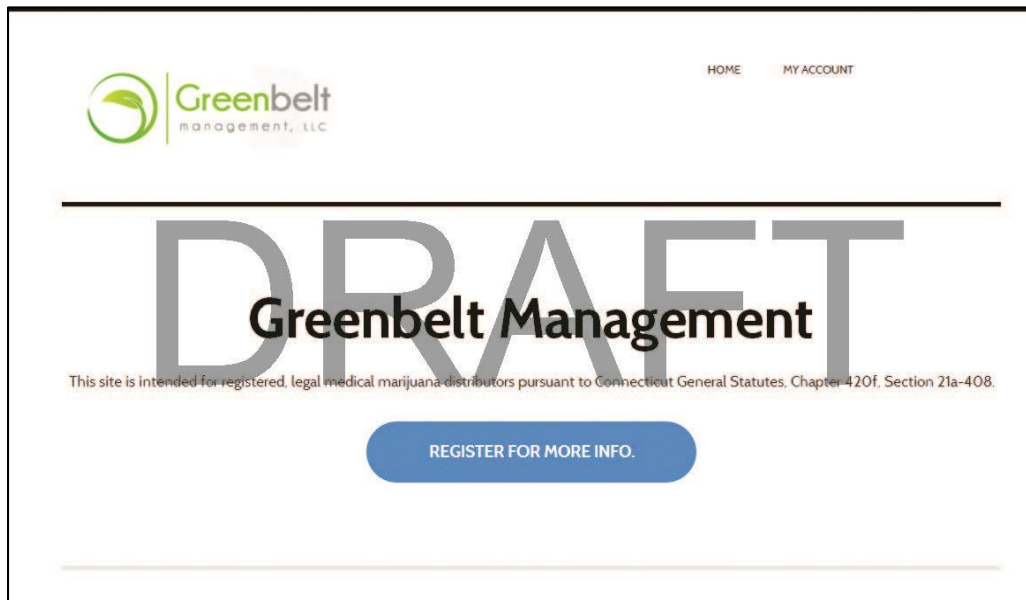
The general manager shall ensure that the inventory control system provides reporting that details:

- A "total inventory in storage" by location and batch report should record user, date, time, item, quantity, and storage access in chronological order.
- An "all events" report must provide detail on all user activity and transaction types within a time frame, and must be able to be tailored to specific data requirements, such as individual items or users.
- A "controlled substances vault compare" report must allow administrators to cross-reference inventory that leaves the storage area and moves to the vault or manufacturing area, or any other location to the inventory at that location. Transactions that do not match show up on this report by location, item, quantity, date, time, and user.
- A "review send" report must provide detailed information regarding the removal of medical marijuana products from the storage area, specifying the user, time, date, item, quantity, and intended destination.
- A "dispensing" report must provide detailed information regarding the transaction of medical marijuana at the dispensary, indicating the user, time, date, item, quantity, and inventory movement at the dispensary.

## Greenbelt Management – Proposed Marketing Plan

1. Provide a copy of the applicant’s proposed marketing plan and include any web templates and educational materials such as brochures, posters, or promotional items.

Greenbelt Management does not intend to engage in any public advertising practices. Should the company decide to advertise in the future, it will obtain the approval of the Commissioner as required by regulation. Greenbelt Management shall provide a secure web portal (restricted to licensed dispensaries) to provide product information and on-line ordering. Once confirmed by a general manager, Greenbelt Management shall issue a log-in and temporary password to enter the web site. Dispensaries shall be required to change their passwords quarterly. Only a dispensary facility manager shall be issued a password by the general manager. All on-line orders will be confirmed by telephone. Draft web templates follow:



## Blue Dream

\$280

**THC** 21.72%

**CBD** 1.10%

**CBN** 0.03%

We recommend this strain for the following conditions:

- Cancer
- Epilepsy
- Chronic Pain

Blue Dream is a hybrid that is great for the daytime when you need relief. It is a combination of Blueberry and Haze strains and was bred to combine the cerebral effects of a sativa with the relaxing effects of an indica.

Price listed reflects the cost per ounce. Note that items added to your cart will not be shipped and purchases cannot be made directly through this website.



ADD TO CART

• Reviews (1)

### Reviews



Dispensary X -  
November 6, 2013:

This type of marijuana has helped a patient manage their pain without coming in every day during the week.



DRAFT

#### RECENT BLOG POSTS



FACTS ABOUT MMJ



WHAT INFORMATION YOU SHOULD GIVE PATIENTS



STRAINS AND WHICH CONDITIONS THEY HELP BEST WITH.

#### ABOUT US

LOREM IPSUM DOLOR SIT AMET, CONSECTETUER ADIPISCING ELIT. AENEAN COMMODO LIGULA EGEE DOLOR. AENEAN MASSA. CUM SOCIIS NATOQUE PENATI ET MAGNIS DIS PARTURIENT MONTES, NASCETUR RIDICULUS MUS, DONEC QUAM FELIS, ULTRICIES.

#### YOUR ACCOUNT

LOG OUT  
RECENT ORDERS  
DOCUMENTATION  
PREFERENCES

#### COMPANY INFO

1 ANYWHERE AVE  
YOUR CITY, STATE  
ZIP CODE  
555-555-5555  
EMAIL@EMAIL.COM



## Product Guide

Thank you for selecting a Greenbelt product. The information in this pamphlet is designed to help you with correct usage of your medical marijuana product, as well as provide ingredients and any applicable warnings. This guide is for use by registered medical marijuana patients in the state of Connecticut, and none of this information constitutes medical advice. Please use these products as instructed by your primary physician.

### Cannabis Tincture



Tincture is intended to be ingested sub-lingually by placing one dropper full under the tongue, then allowing to rest for up to one full minute.  
**Ingredients:** glycerine, infused cannabis saliva.  
**Warning:** do not drive or operate heavy machinery for up to 6 hours after using this product.  
See package for test results.

### Cannabis Lotion

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**Warning:** Etiam ultricies nisi vel augue. Curabitur ullam corper ultricies nisi. Nam eget dui.



### General Info

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**Sed consequat,** leo eget bibendum sodales, augue velit cursus nunc. Sed ut perspiciatis unde omnis iste natus error sit voluptatem accusantium dolorumque laudantium, totam rem aperiam, eaque ipsa quae ab illo inventore veritatis et quasi architecto beatae vitae dicta sunt explicabo. Nemo enim ipsam voluptatem quia voluptas sit aspernatur aut odit aut fugit,



### Dispenser Pen

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**Warning:** Etiam ultricies nisi vel augue. Curabitur ullam corper ultricies nisi. Nam eget dui.

5234 Anywhere St,  
Anytown, CT  
55555-5555  
www.outfile.com



This information is for educational purposes only and is not intended to steer or influence choices made by patient or caregiver with regard to the selection of a marijuana product, and should only be distributed after a completed transaction.

## Protection of Proprietary Information Request

Greenbelt Management, LLC respectfully requests the information contained in the following pages marked as confidential, be given protection from Freedom of Information Act requests as it contains proprietary information. In particular, this section contains information regarding personal and company finances, which we believe to be personal and confidential.

The information contained in this bid for licensure by the Department of Consumer Protection is not subject to Freedom of Information Act requests pursuant to C.G.S. Section 1-210(b)(24), which exempts as follows:

“(24) Responses to any request for proposals or bid solicitation issued by a public agency or any record or file made by a public agency in connection with the contract award process, until such contract is executed or negotiations for the award of such contract have ended, whichever occurs earlier, provided the chief executive officer of such public agency certifies that the public interest in the disclosure of such responses, record or file is outweighed by the public interest in the confidentiality of such responses, record or file;”

In addition to the general exemption of responses to RFP's found in In addition to the general exemption found in C.G.S. Section 1-210(b)(24), this information is also exempt from the Connecticut Freedom Of Information Act pursuant to C.G.S. Section 1-210(b)(5)., this information is also exempt from the Connecticut Freedom Of Information Act pursuant to C.G.S. Section 1-210(b)(5).



## Greenbelt Management – Corporate Documents

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.

### **Greenbelt Management** Limited Liability Company

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Operating Agreement

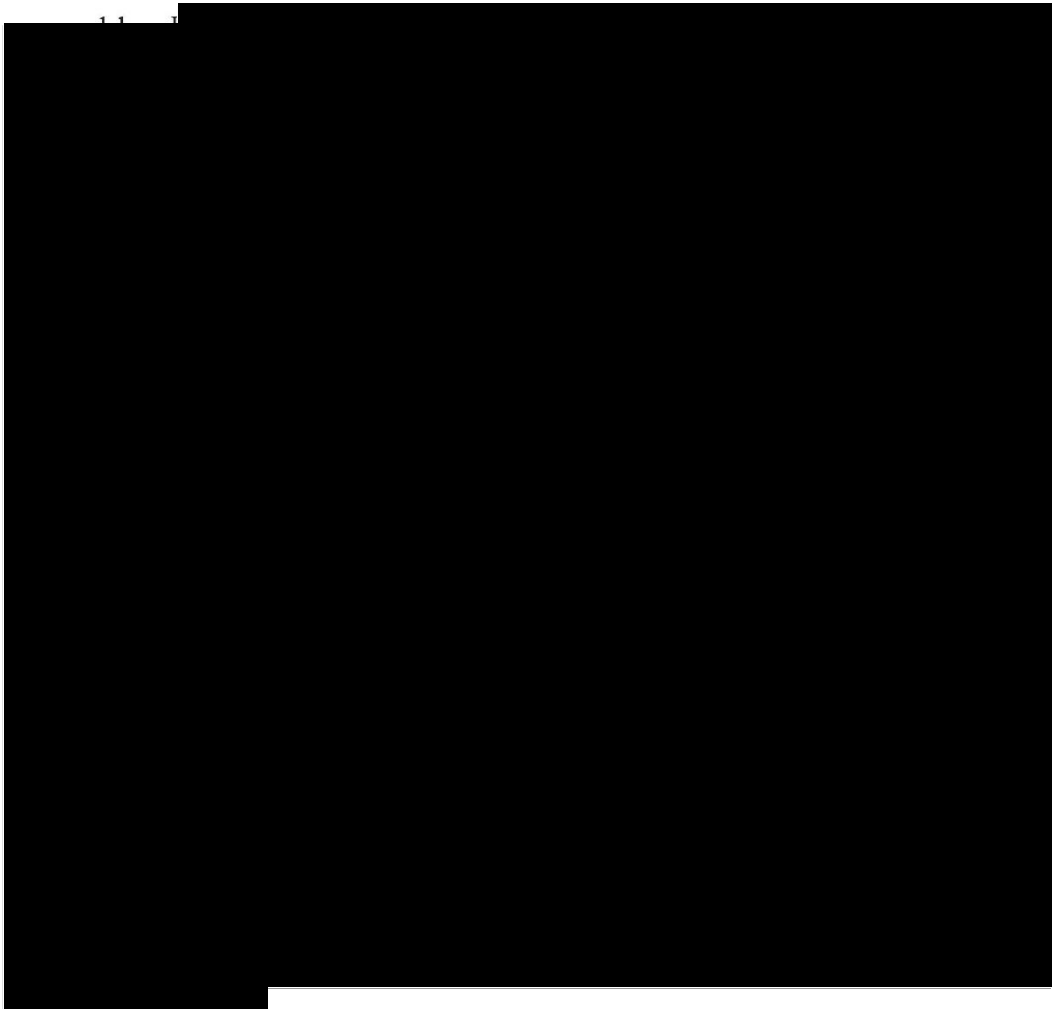
Of

**Greenbelt Management** Limited Liability Company

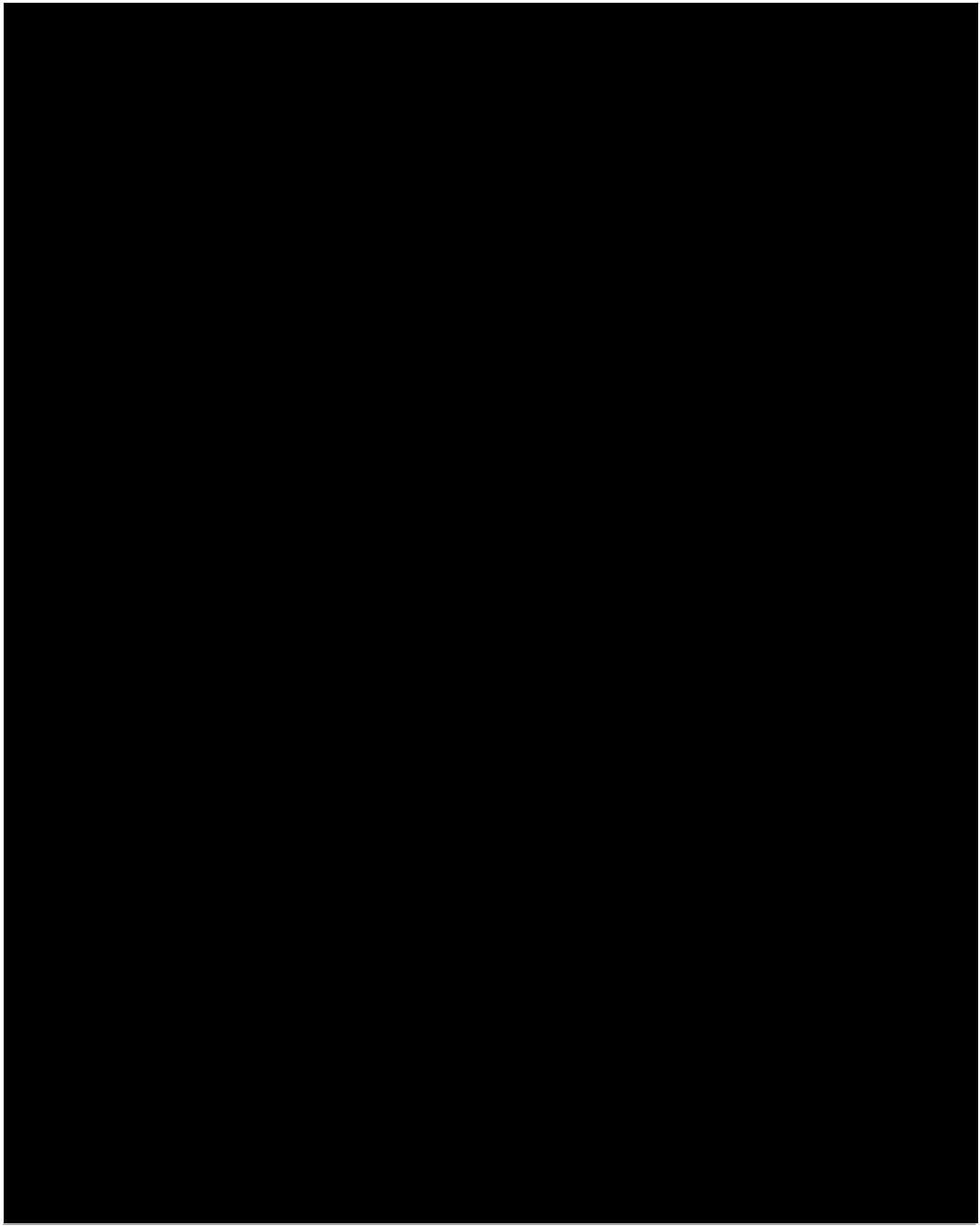
12/08/2013

ARTICLE I.

OFFICES



**CONFIDENTIAL**

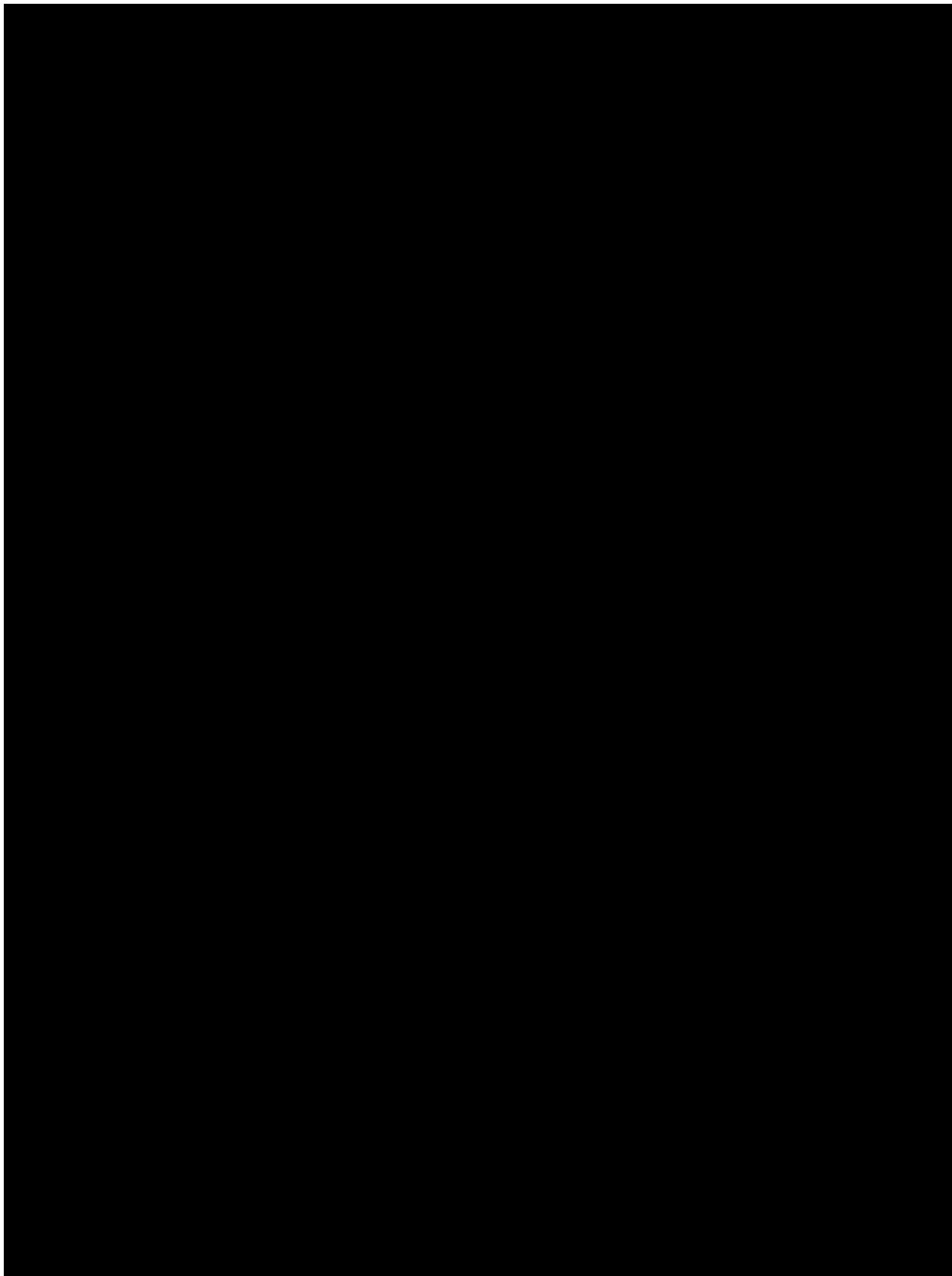


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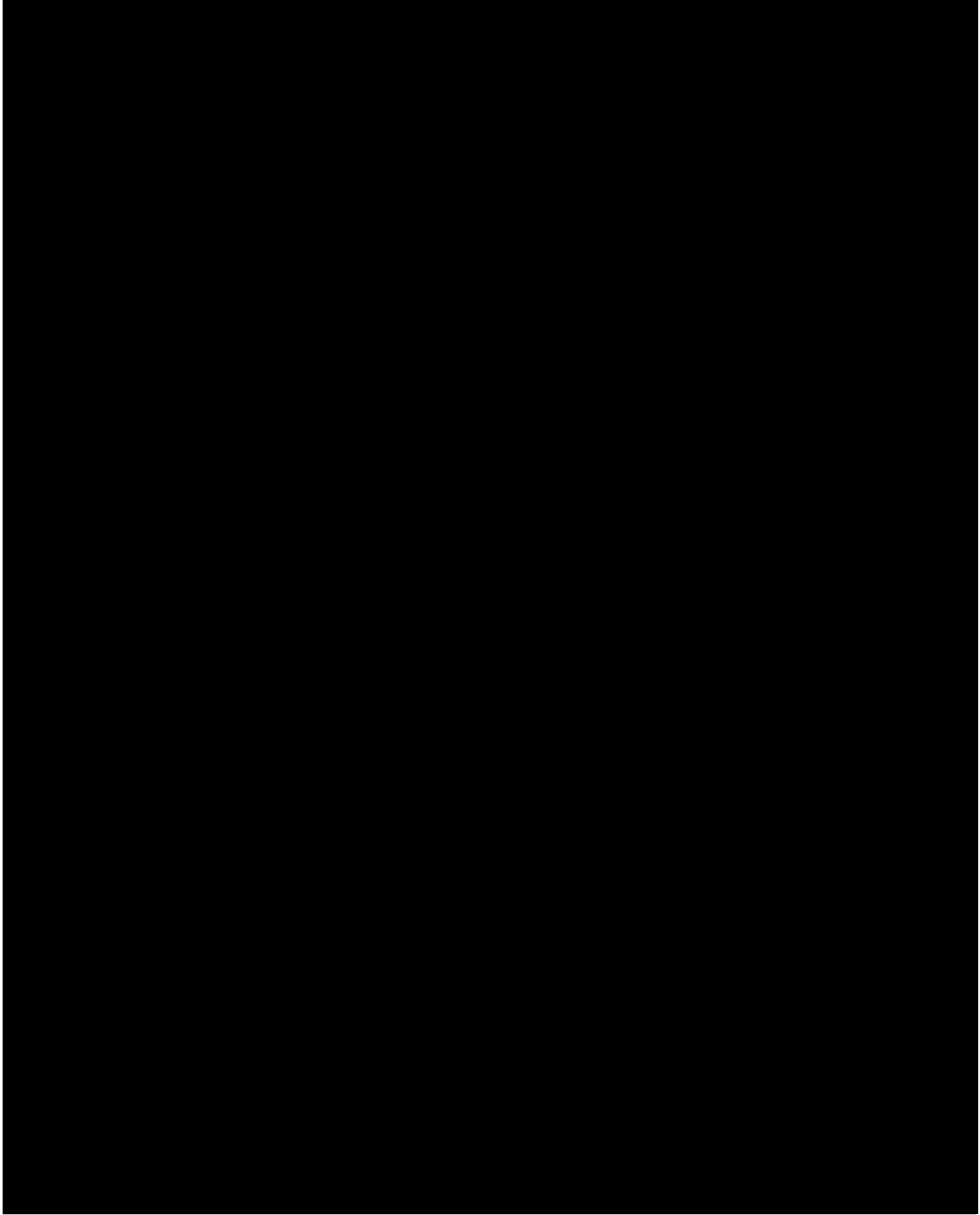
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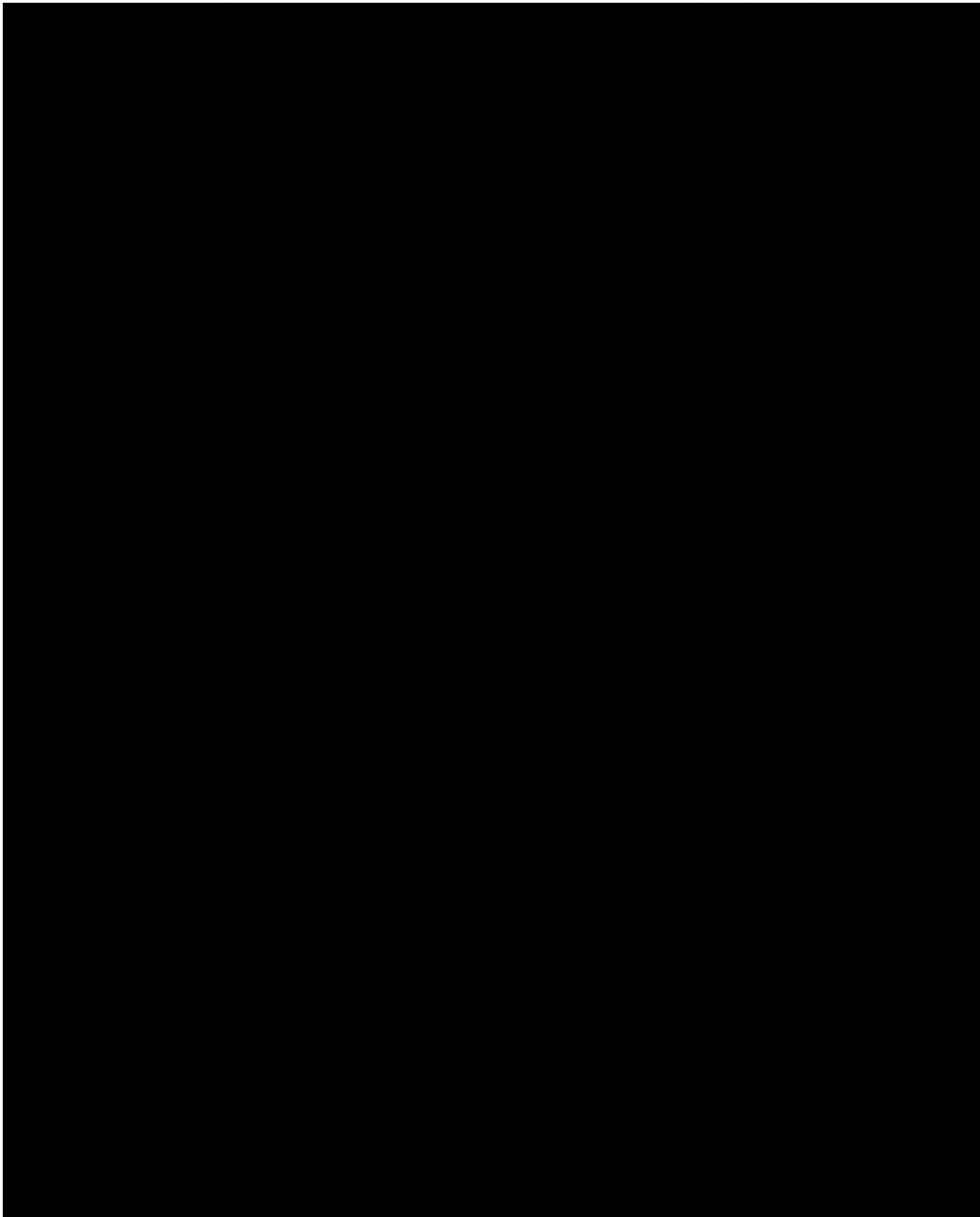
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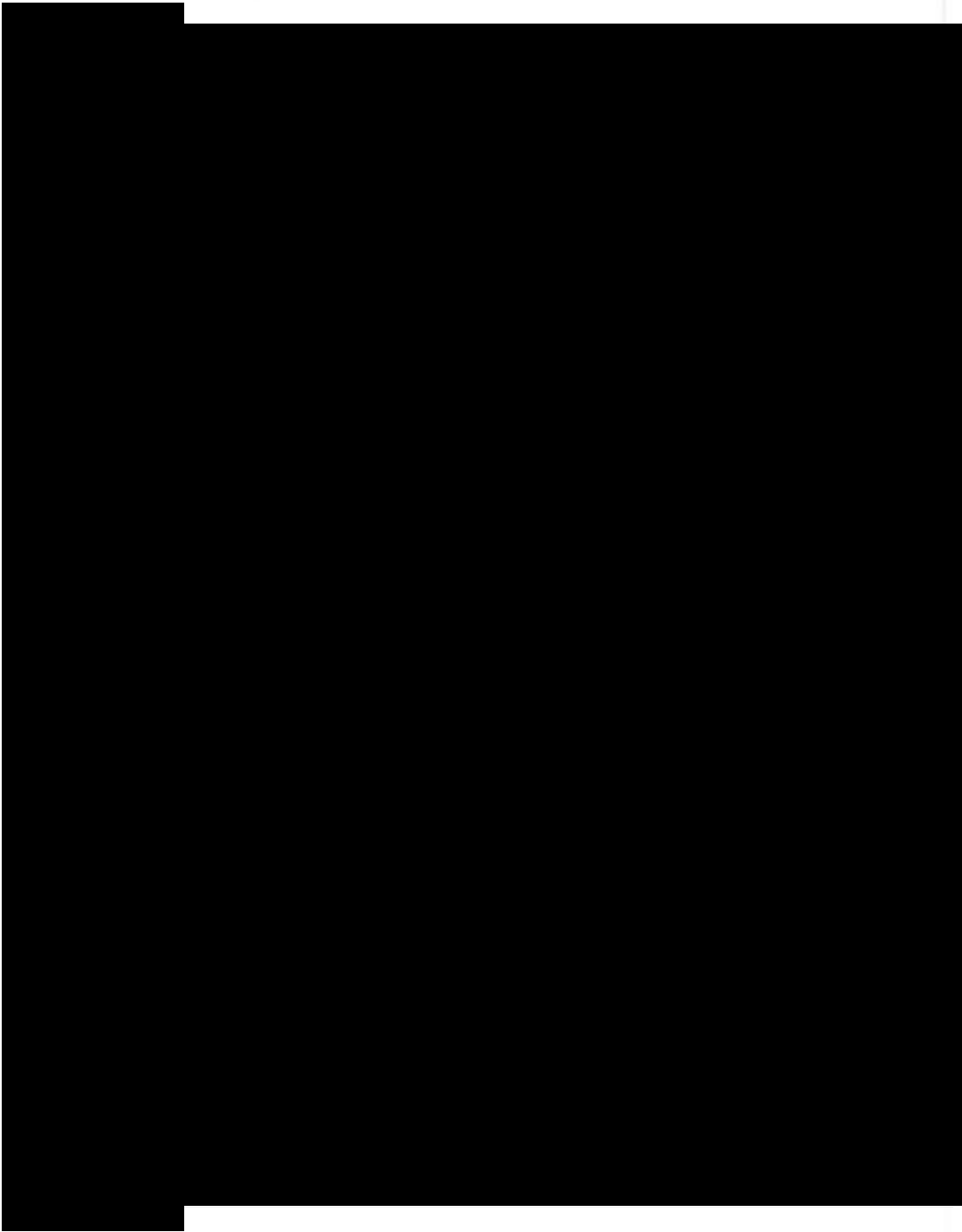


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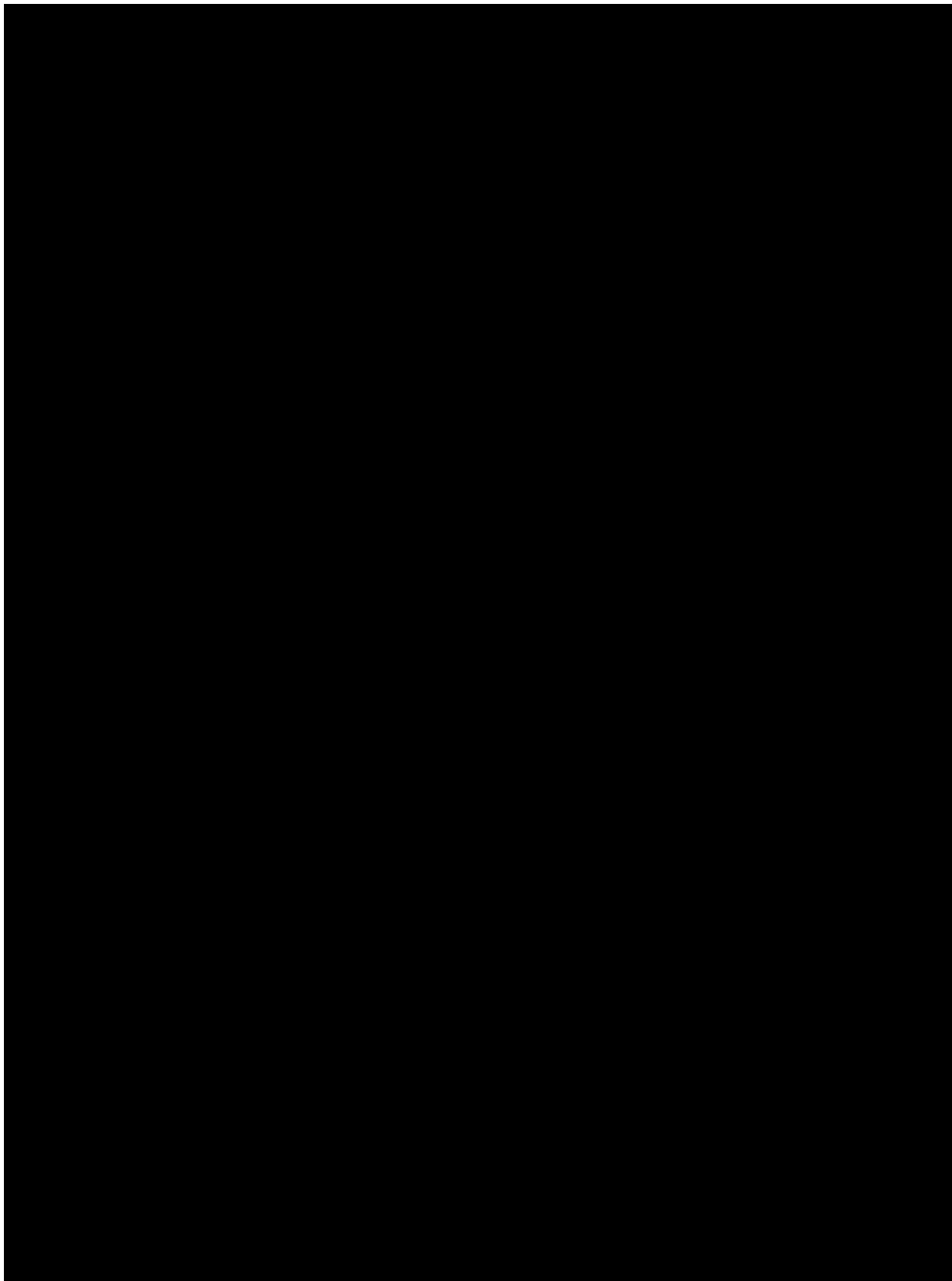


**CONFIDENTIAL**





**CONFIDENTIAL**



**CONFIDENTIAL**



**CONFIDENTIAL**

RATIFICATION



**CONFIDENTIAL**



# 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

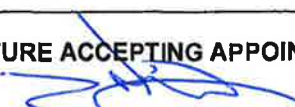
PHONE: 860-509-6003

WEBSITE: [www.concord-sofs.ct.gov](http://www.concord-sofs.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.

<b>FILING PARTY (CONFIRMATION WILL BE SENT TO THIS ADDRESS):</b> NAME: <b>Greenbelt Management LLC</b> ADDRESS: <b>1189 Post Road, 3A</b>  CITY: <b>Fairfield</b> STATE: <b>CT</b> ZIP: <b>06824</b>		<b>FILING FEE: \$120</b> MAKE CHECKS PAYABLE TO "SECRETARY OF THE STATE"
<b>1. NAME OF LIMITED LIABILITY COMPANY - REQUIRED:</b> (MUST INCLUDE BUSINESS DESIGNATION I.E. LLC, L.L.C., ETC.) <b>Greenbelt Management LLC</b>		
<b>2. DESCRIPTION OF BUSINESS TO BE TRANSACTED OR PURPOSE TO BE PROMOTED - REQUIRED:</b> ATTACH 8 1/2 X 11 SHEETS IF NECESSARY.  To engage in any lawful act or activity for which a limited liability company may be formed under the Connecticut Limited Liability Act.		
<b>3. LLC'S PRINCIPAL OFFICE ADDRESS - REQUIRED:</b> (NO P.O. BOX) PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: <b>1189 Post Road, 3A</b>  CITY: <b>Fairfield</b> STATE: <b>CT</b> ZIP: <b>06824</b>		
<b>4. MAILING ADDRESS, IF DIFFERENT THAN #3:</b> PROVIDE FULL ADDRESS. "SAME AS ABOVE" NOT ACCEPTABLE. ADDRESS: <b>1189 Post Road, 3A</b>  CITY: <b>Fairfield</b> STATE: <b>CT</b> ZIP: <b>06824</b>		
<b>5. APPOINTMENT OF STATUTORY AGENT FOR SERVICE OF PROCESS - REQUIRED:</b> (COMPLETE A OR B NOT BOTH) <input checked="" type="checkbox"/> <b>A. IF AGENT IS AN INDIVIDUAL.</b> PRINT OR TYPE FULL LEGAL NAME:  <b>Jason Nickerson</b>		
<b>BUSINESS ADDRESS</b> (P.O. BOX NOT ACCEPTABLE) IF NONE, MUST STATE "NONE"		<b>CONNECTICUT RESIDENCE ADDRESS</b> (P.O. BOX NOT ACCEPTABLE)
ADDRESS: <b>1189 Post Road, 3A</b>  CITY: <b>Fairfield</b> STATE: <b>CT</b> ZIP: <b>06824</b>		ADDRESS: <b>1189 Post Road, 3A</b>  CITY: <b>Fairfield</b> STATE: <b>CT</b> ZIP: <b>06824</b>
<b>SIGNATURE ACCEPTING APPOINTMENT:</b> 		

B. IF AGENT IS A BUSINESS:

PRINT OR TYPE NAME OF BUSINESS AS IT APPEARS ON OUR RECORDS:

**CT BUSINESS ADDRESS** (P.O.BOX UNACCEPTABLE)

ADDRESS:

CITY:

STATE:

ZIP:

**SIGNATURE ACCEPTING APPOINTMENT ON BEHALF OF AGENT:**

[Signature line]

**PRINT NAME & TITLE OF PERSON SIGNING:**

[Print name and title line]

**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)
Jason Nickerson	LLC Member	1189 Post Road, 3A Fairfield, CT 06824	1189 Post Road, 3A Fairfield, CT 06824

**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 21st DAY OF December, 2012

NAME OF ORGANIZER (PRINT OR TYPE)	SIGNATURE
Jason M Nickerson	

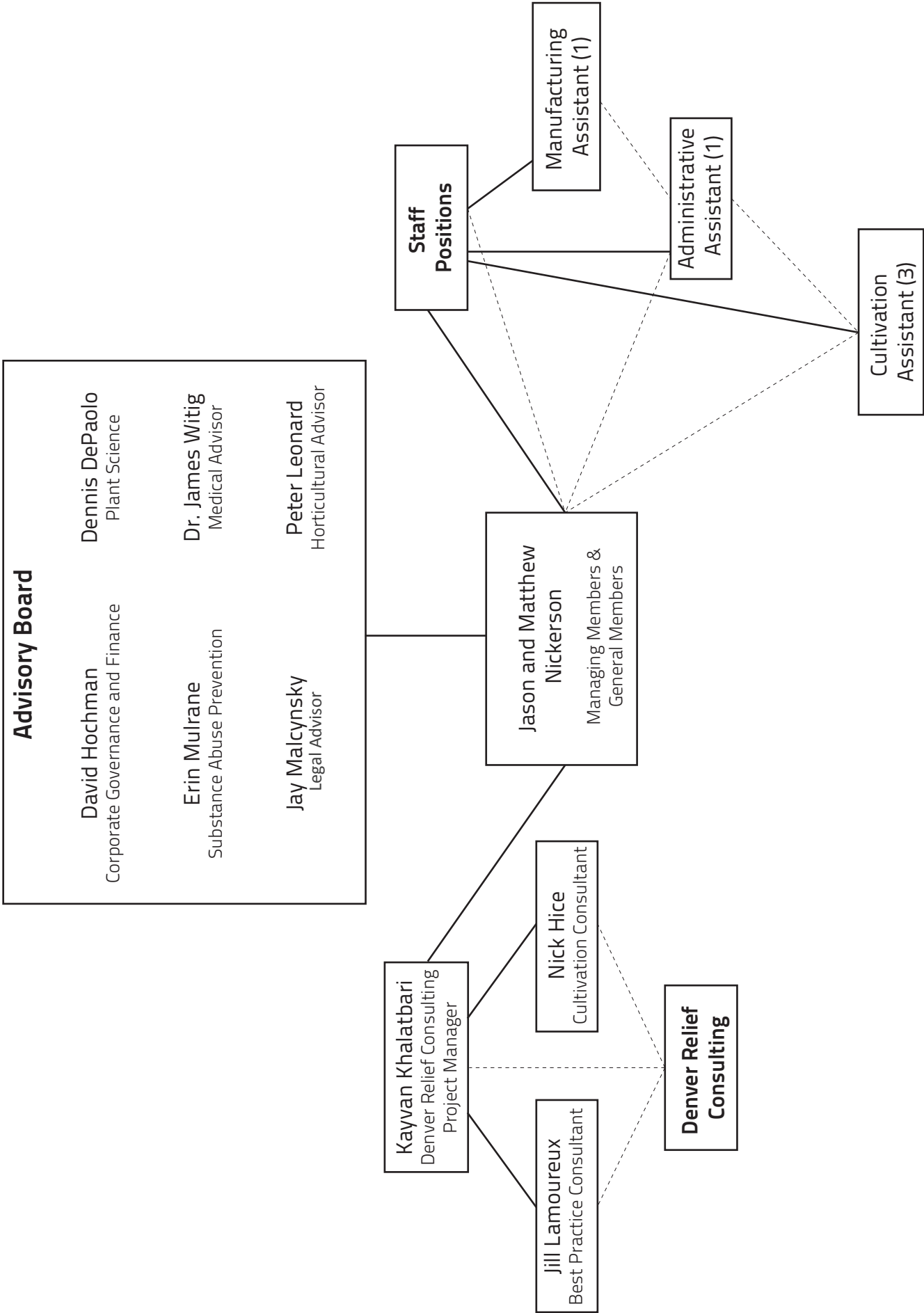
AN ANNUAL REPORT WILL BE DUE YEARLY IN THE ANNIVERSARY MONTH THAT THE ENTITY WAS FORMED/REGISTERED AND CAN BE EASILY FILED ONLINE @ [www.concord-sots.ct.gov](http://www.concord-sots.ct.gov)  
CONTACT YOUR TAX ADVISOR OR THE TAXPAYER SERVICE CENTER AT THE DEPARTMENT OF REVENUE SERVICES AS TO ANY POTENTIAL 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](http://www.ct.gov/drs)

## Greenbelt Management – Organization Chart

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.

Exhibits

Exhibit 2.a. – Qualifications





## Greenbelt Management – Compensation Agreements

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.

## EXECUTIVE EMPLOYMENT AGREEMENT

This Executive Employment Agreement ("Agreement") is made and effective this October 12<sup>th</sup>, 2013 by and between Greenbelt Management LLC. ("Company") and Matthew Alexander Nickerson ("Executive").

NOW, THEREFORE, the parties hereto agree as follows:

### 1. Employment.

Company hereby agrees to initially employ Executive as its Chief Financial Officer and Executive and hereby accepts such employment in accordance with the terms of this Agreement and the terms of employment applicable to regular employees of Company. In the event of any conflict or ambiguity between the terms of this Agreement and terms of employment applicable to regular employees, the terms of this Agreement shall control. Election or appointment of Executive to another office or position, regardless of whether such office or position is inferior to Executive's initial office or position, shall not be a breach of this Agreement.

### 2. Duties of Executive.

The duties of Executive shall include the performance of all of the duties typical of the office held by Executive as described in the bylaws of the Company and such other duties and projects as may be assigned by a superior officer of the Company, if any, or the board of directors of the Company. Executive shall devote his entire productive time, ability and attention to the business of the Company and shall perform all duties in a professional, ethical and businesslike manner. Executive will not, during the term of this Agreement, directly or indirectly engage in any other business, either as an employee, employer, consultant, principal, officer, director, advisor, or in any other capacity, either with or without compensation, without the prior written consent of Company.

### 3. Compensation.

Executive will be paid compensation during this Agreement as follows:

A base salary of \$70,000 per year, payable in installments according to the Company's regular payroll schedule. The base salary shall be adjusted at the end of each year of employment at the discretion of the board of directors.

#### 4. Benefits.

A. Holidays. Executive will be entitled to at least 8 paid holidays each calendar year and 10 personal days. Company will notify Executive on or about the beginning of each calendar year with respect to the holiday schedule for the coming year. Personal holidays, if any, will be scheduled in advance subject to requirements of Company. Such holidays must be taken during the calendar year and cannot be carried forward into the next year. Executive is not entitled to any personal holidays during the first six months of employment.

B. Vacation. Following the first six months of employment, Executive shall be entitled to 7 paid vacation days each year.

C. Sick Leave. Executive shall be entitled to sick leave and emergency leave according to the regular policies and procedures of Company. Additional sick leave or emergency leave over and above paid leave provided by the Company, if any, shall be unpaid and shall be granted at the discretion of the board of directors.

D. Pension and Profit Sharing Plans. Executive shall be entitled to participate in any pension or profit sharing plan or other type of plan adopted by Company for the benefit of its officers and/or regular employees.

E. Expense Reimbursement. Executive shall be entitled to reimbursement for all reasonable expenses, including travel and entertainment, incurred by Executive in the performance of Executive's duties. Executive will maintain records and written receipts as required by the Company policy and reasonably requested by the board of directors to substantiate such expenses.

#### 5. Term and Termination.

A. The Initial Term of this Agreement shall commence on January 1<sup>st</sup> 2014 and it shall continue in effect for a period of January 1<sup>st</sup> 2015. Thereafter, the Agreement shall be renewed upon the mutual agreement of Executive and Company. This Agreement and Executive's employment may be terminated at Company's discretion during the Initial Term, provided that Company shall pay to Executive an amount equal to payment at Executive's base salary rate for the remaining period of Initial Term. In the event of such termination, Executive shall not be entitled to any incentive salary payment or any other compensation then in effect, prorated or otherwise.

B. This Agreement may be terminated by Executive at Executive's discretion by providing at least thirty (30) days prior written notice to Company. In the event of termination by Executive pursuant to this

subsection, Company may immediately relieve Executive of all duties and immediately terminate this Agreement, provided that Company shall pay Executive at the then applicable base salary rate to the termination date included in Executive's original termination notice.

C. In the event that Executive is in breach of any material obligation owed Company in this Agreement, habitually neglects the duties to be performed under this Agreement, engages in any conduct which is dishonest, damages the reputation or standing of the Company, or is convicted of any criminal act or engages in any act of moral turpitude, then Company may terminate this Agreement upon five (5) days notice to Executive. In event of termination of the agreement pursuant to this subsection, Executive shall be paid only at the then applicable base salary rate up to and including the date of termination. Executive shall not be paid any incentive salary payments or other compensation, prorated or otherwise.

D. In the event Company is acquired, or is the non-surviving party in a merger, or sells all or substantially all of its assets, this Agreement shall not be terminated and Company agrees to use its best efforts to ensure that the transferee or surviving company is bound by the provisions of this Agreement.

#### 6. Notices.

Any notice required by this Agreement or given in connection with it, shall be in writing and shall be given to the appropriate party by personal delivery or by certified mail, postage prepaid, or recognized overnight delivery services;

If to Company:

Greenbelt Management LLC

1189 Post Road, Suite 3A Fairfield CT, 06824

If to Executive:

Matthew Nickerson

15 Foster Place, Sea Cliff, NY 11579

#### 7. Final Agreement.

This Agreement terminates and supersedes all prior understandings or agreements on the subject matter hereof. This Agreement may be modified only by a further writing that is duly executed by both parties.

#### 8. Governing Law.

This Agreement shall be construed and enforced in accordance with the laws of the state of Connecticut.

#### 9. Headings.

Headings used in this Agreement are provided for convenience only and shall not be used to construe meaning or intent.

#### 10. No Assignment.

Neither this Agreement nor any or interest in this Agreement may be assigned by Executive without the prior express written approval of Company, which may be withheld by Company at Company's absolute discretion.

#### 11. Severability.

If any term of this Agreement is held by a court of competent jurisdiction to be invalid or unenforceable, then this Agreement, including all of the remaining terms, will remain in full force and effect as if such invalid or unenforceable term had never been included.

#### 12. Arbitration.

The parties agree that they will use their best efforts to amicably resolve any dispute arising out of or relating to this Agreement. Any controversy, claim or dispute that cannot be so resolved shall be settled by final binding arbitration in accordance with the rules of the American Arbitration Association and judgment upon the award rendered by the arbitrator or arbitrators may be entered in any court having jurisdiction thereof. Any such arbitration shall be conducted in the relevant State of Connecticut court or such other place as may be mutually agreed upon by the parties. Within fifteen (15) days after the commencement of the arbitration, each party shall select one person to act as arbitrator, and the two arbitrators so selected shall select a third arbitrator within ten (10) days of their appointment. Each party shall bear its own costs and expenses and an equal share of the arbitrator's expenses and administrative fees of arbitration.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date first above written.



---

Greenbelt Management LLC, Authorized Signatory



10/12/13

---

Matthew Nickerson, CFO

## EXECUTIVE EMPLOYMENT AGREEMENT

This Executive Employment Agreement ("Agreement") is made and effective this October 12<sup>th</sup>, 2013 by and between Greenbelt Management LLC. ("Company") and Jason Michael Nickerson ("Executive").

NOW, THEREFORE, the parties hereto agree as follows:

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### 2. Duties of Executive.

The duties of Executive shall include the performance of all of the duties typical of the office held by Executive as described in the bylaws of the Company and such other duties and projects as may be assigned by a superior officer of the Company, if any, or the board of directors of the Company. Executive shall devote his entire productive time, ability and attention to the business of the Company and shall perform all duties in a professional, ethical and businesslike manner. Executive will not, during the term of this Agreement, directly or indirectly engage in any other business, either as an employee, employer, consultant, principal, officer, director, advisor, or in any other capacity, either with or without compensation, without the prior written consent of Company.

### 3. Compensation.

Executive will be paid compensation during this Agreement as follows:

A base salary of [REDACTED] per year, payable in installments according to the Company's regular payroll schedule. The base salary shall be adjusted at the end of each year of employment at the discretion of the board of directors.

### 4. Benefits.

A. Holidays. Executive will be entitled to at least 8 paid holidays each calendar year and 10 personal days. Company will notify Executive on or about the beginning of each calendar year with respect to the holiday schedule for the coming year. Personal holidays, if any, will be scheduled in advance subject to requirements of Company. Such holidays must be taken during the calendar year and cannot be carried forward into the next year. Executive is not entitled to any personal holidays during the first six months of employment.

B. Vacation. Following the first six months of employment, Executive shall be entitled to 7 paid vacation days each year.

C. Sick Leave. Executive shall be entitled to sick leave and emergency leave according to the regular policies and procedures of Company. Additional sick leave or emergency leave over and above paid leave provided by the Company, if any, shall be unpaid and shall be granted at the discretion of the board of directors.

D. Pension and Profit Sharing Plans. Executive shall be entitled to participate in any pension or profit sharing plan or other type of plan adopted by Company for the benefit of its officers and/or regular employees.

E. Expense Reimbursement. Executive shall be entitled to reimbursement for all reasonable expenses, including travel and entertainment, incurred by Executive in the performance of Executive's duties. Executive will maintain records and written receipts as required by the Company policy and reasonably requested by the board of directors to substantiate such expenses.

## 5. Term and Termination.

A. The Initial Term of this Agreement shall commence on January 1<sup>st</sup> 2014 and it shall continue in effect for a period of January 1<sup>st</sup> 2015. Thereafter, the Agreement shall be renewed upon the mutual agreement of Executive and Company. This Agreement and Executive's employment may be terminated at Company's discretion during the Initial Term, provided that Company shall pay to Executive an amount equal to payment at Executive's base salary rate for the remaining period of Initial Term. In the event of such termination, Executive shall not be entitled to any incentive salary payment or any other compensation then in effect, prorated or otherwise.

B. This Agreement may be terminated by Executive at Executive's discretion by providing at least thirty (30) days prior written notice to Company. In the event of termination by Executive pursuant to this subsection, Company may immediately relieve Executive of all duties and immediately terminate this



Agreement, provided that Company shall pay Executive at the then applicable base salary rate to the termination date included in Executive's original termination notice.

C. In the event that Executive is in breach of any material obligation owed Company in this Agreement, habitually neglects the duties to be performed under this Agreement, engages in any conduct which is dishonest, damages the reputation or standing of the Company, or is convicted of any criminal act or engages in any act of moral turpitude, then Company may terminate this Agreement upon five (5) days notice to Executive. In event of termination of the agreement pursuant to this subsection, Executive shall be paid only at the then applicable base salary rate up to and including the date of termination. Executive shall not be paid any incentive salary payments or other compensation, prorated or otherwise.

D. In the event Company is acquired, or is the non-surviving party in a merger, or sells all or substantially all of its assets, this Agreement shall not be terminated and Company agrees to use its best efforts to ensure that the transferee or surviving company is bound by the provisions of this Agreement.

#### 6. Notices.

Any notice required by this Agreement or given in connection with it, shall be in writing and shall be given to the appropriate party by personal delivery or by certified mail, postage prepaid, or recognized overnight delivery services;

If to Company:

Greenbelt Management LLC

1189 Post Road, Suite 3A Fairfield CT, 06824

If to Executive:

Jason Nickerson

1189 Post Road, Suite 3A Fairfield CT, 06824

#### 7. Final Agreement.

This Agreement terminates and supersedes all prior understandings or agreements on the subject matter hereof. This Agreement may be modified only by a further writing that is duly executed by both parties.

#### 8. Governing Law.

This Agreement shall be construed and enforced in accordance with the laws of the state of Connecticut.

#### 9. Headings.

Headings used in this Agreement are provided for convenience only and shall not be used to construe meaning or intent.

#### 10. No Assignment.

Neither this Agreement nor any or interest in this Agreement may be assigned by Executive without the prior express written approval of Company, which may be withheld by Company at Company's absolute discretion.

#### 11. Severability.

If any term of this Agreement is held by a court of competent jurisdiction to be invalid or unenforceable, then this Agreement, including all of the remaining terms, will remain in full force and effect as if such invalid or unenforceable term had never been included.

#### 12. Arbitration.


The parties agree that they will use their best efforts to amicably resolve any dispute arising out of or relating to this Agreement. Any controversy, claim or dispute that cannot be so resolved shall be settled by final binding arbitration in accordance with the rules of the American Arbitration Association and judgment upon the award rendered by the arbitrator or arbitrators may be entered in any court having jurisdiction thereof. Any such arbitration shall be conducted in the relevant State of Connecticut court or such other place as may be mutually agreed upon by the parties. Within fifteen (15) days after the commencement of the arbitration, each party shall select one person to act as arbitrator, and the two arbitrators so selected shall select a third arbitrator within ten (10) days of their appointment. Each party shall bear its own costs and expenses and an equal share of the arbitrator's expenses and administrative fees of arbitration.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the date first above written.

 10/12/13

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Greenbelt Management LLC, Authorized Signatory



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Jason Nickerson, COO

### **Memorandum of Understanding**

This Memorandum of Understanding (“MOU”) made and entered into November 14<sup>th</sup>, 2013 by and between Greenbelt Management, LLC (“Client”) the corporation formed in accordance with the laws of the State of Connecticut that submits an application(s) for approval of a Producer License to the Department of Consumer Protection and Denver Relief Consulting, LLC, a limited liability corporation duly organized and existing under the laws of the State of Colorado having its principal office at 1 Broadway #A200, Denver, CO 80203 (“Consultant”), collectively known as the (“Parties”).

WITNESSETH :

WHEREAS, Client and Consultant desire to execute this MOU as an initial consulting agreement and advisory services contract prior to the adoption of a Advisory Services Agreement anticipated to be executed by the Client and Consultant in relation to the operation and management of a Licensed Production Facility (LPF) in the State of Connecticut;

WHEREAS, Client and Consultant will execute an Advisory Services Agreement in conjunction with this MOU and such consulting agreement shall include a \$10,000.00 mobilization fee in the event the Client is awarded necessary registration to operate an LPF in Connecticut;

WHEREAS, Client desires to retain the Consultant and Consultant desires to serve as a consultant and advisor with regard to the LPF.

WHEREAS, Client and Consultant desire to execute an Advisory Services Agreement in conjunction with this MOU for compliance, extracts, infused products and cultivation consulting services provided by the Consultant to the Client at Consultant’s standard billing rates;

WHEREAS, the Client agrees to compensate Consultant a minimum of \$1,000 per month, should the hours worked not exceed that amount in compensation.

WHEREAS, Consultant agrees to reserve for Client no less than ten hours of consulting services each week for a period of 36 months from the date of notice to proceed as a Licensed Producer from the Connecticut Department of Consumer Protection.

NOW, THEREFORE, in consideration of the covenants and promises contained herein, the Parties agree to following:

#### **Section 1 Services Provided by Consultant**

During the term of this MOU and thereafter as agreed to by the Parties, the Consultant shall provide the following services, which shall be provided under the supervision of the Client:

- a) Advisement and oversight of construction of the production facility, and

subsequent production facility operations services until the termination of this MOU;

- b) Comprehensive employee training in compliance and operation of production facility and development of standard operating procedures; and
- c) Periodic audits of production facility to ensure compliance with applicable regulations. Audits shall be conducted each month for the first year of the term of this MOU and shall be conducted on a quarterly basis thereafter until the MOU is terminated.

Additionally, Consultant shall have the sole authority and discretion to appoint and remove any Consultant employee who may have been utilized by Consultant in providing services to or for Client. It is understood that it is possible no person employed by the Consultant will be provided on a full-time basis to oversee or perform the operations of the Client. Consultant does represent that it will make sufficient personnel available so that the compliance advisement and oversight during construction of the production facility will be carried out in a professional businesslike manner and in accordance with the policies of the Client.

### **Section 2 Consultant Duties**

Without in any way limiting the general duties and authority of Consultant under this MOU, Consultant shall perform the following specific duties for Client:

- a) Inform Client of operations and obtain prior approval for all business and financial decisions;
- b) Assist in maintaining legal status of Client to the best ability of the Consultant and in cooperation with Client;
- c) Utilize any of Consultant's or Client's employees in carrying out the duties of the Consultant under this MOU;
- d) Employ its best efforts to cause the Client's Business and activities to comply with all Connecticut state and local laws including but not limited to the establishment of policies and procedures for all related parties; and
- e) Such other duties as are reasonably needed by the Client to maintain pre-and post- licensing statutory and regulatory compliance and sufficient cultivation facilities and operations.

### **Section 3 Client Duties**

The Client shall undertake to perform its duties of oversight and policy determination without interfering with the day-to-day management and operations as described herein as duties delegated to the Consultant.

### **Section 4 Term of Agreement; Termination**

This MOU shall be effective from the date in the preamble of this MOU, and unless extended by written agreement of the Parties, shall be terminated upon the earlier to occur of one of the following events:

- a) The execution and adoption of a Advisory Services Contract including a

provision for equity conversion; or

- b) Client's management interferes with the authority of Consultant to manage and conduct the day-to-day operations of the Client related to the services described herein that remains uncured after Client receives a ten-day written warning by Consultant and Consultant agrees in writing to the termination; or
- c) Client's management determines there is "cause" for terminating the Agreement. For purposes of this provision, "cause" shall mean (a) failure of Consultant to provide adequate services in accordance with this MOU after receipt of three written 10-day warnings from Client's management, (b) commission of acts by Consultant outside the scope of this MOU that cause material embarrassment or damage to Client which undermines the name and business activities of Client that cannot be cured, or (c) the conclusion from two independent outside certified public accountants or the conviction in a court of law that Consultant has misappropriated, embezzled or otherwise stolen Client's funds; or
- d) Any material act by Consultant that jeopardizes Client's permit as evidence by a written notice naming Consultant or Consultant employees by the applicable state or local licensing authority; or
- e) Failure of Client to obtain a permit to become a Licensed Producer.

#### **Section 5 Restriction Against Contracting with Manager**

Without the prior written or otherwise recorded consent of Consultant's advisement, Client specifically agrees that it will not employ or otherwise retain the service of any individual who, while employed by Consultant, has provided services to or for Client on behalf of Consultant pursuant to Consultant's obligations under this MOU. This restriction shall apply, with respect to any employee of Consultant for a period of one (1) year following the termination of this MOU.

#### **Section 6 Insurance; Bonding**

The parties recognize and acknowledge that it is imperative that Client have adequate insurance coverage for its business operations. The parties shall mutually undertake to determine the most effective and least costly means of providing all of the customary insurance for a company engaged in the business of Client, particularly for the Business which Consultant's duties and responsibilities will be required under this MOU. The insurance will include, but not necessarily be limited to, casualty and liability insurance and fidelity bonds covering Administrator, its employees and agents if requested by Dispensary's management. The amounts of insurance shall be determined by Client's management.

#### **Section 7 Notices**

All notices to be given by one party to the other pursuant to this MOU shall be in writing and mailed, postage prepaid by certified United States mail, or sent by facsimile transmission or e-mail with delivery confirmation, to the other party addressed to the receiving party's last known address or at such other address as a party may specify by notice to the other party. Notices shall be effective on dispatch.

**Section 8 Financial Reporting**

During the term of this MOU, the parties shall cooperate in causing to be prepared such financial statements and tax returns as shall be required by Client's management or by law.

**Section 9 Applicable Law**

This MOU shall be governed by and construed and interpreted in accordance with the laws of the State of Connecticut.

**Section 10 Severability**

If any provision of this MOU shall be held to be invalid by a court of competent jurisdiction, the remainder of this MOU shall nevertheless remain fully enforceable as if the invalid provision were not a part of the MOU.

**Section 11 Arbitration**

All claims, disputes, controversies or differences which may arise between the Parties out of or in relation to or in connection with this MOU or for the breach thereof shall be finally settled by arbitration in the State of Connecticut in accordance with the state law. The award rendered by the arbitrator(s) shall be final and binding upon both Parties concerned.

**Section 12 Headings**

The headings used in this MOU are inserted for convenience only and constitute neither a portion of this MOU nor in any manner affect the provisions or interpretations of this MOU.

**Section 13 Counterparts**

This MOU may be signed in any number of counterparts, each of which shall be deemed an original, but all of which shall constitute one and the same instrument.

**Section 14 Warranty, After Service and Others**

Detailed terms and conditions not stipulated in this MOU shall be agreed to in the Advisory Services Agreement.

**Section 19 Limitations of Liability**

Consultant shall not be liable to Client, its governing body, its management or its equity holders for any actual or perceived financial insufficiencies in or losses from the operations of Client unless caused by Consultant's actions that would be grounds for termination of this MOU by Client for "cause"

IN WITNESS WHEREOF, the Parties hereto have caused their duly representative to execute this MOU on the date first written above.

Greenbelt Management, LLC

By: 

Printed Name: JASON M. NICKERSON

Authorized representative of Greenbelt  
Management, LLC

Denver Relief Consulting, LLC

By: 

Printed Name: Kayvan S.T. Khalatbari

Title: Manager



## Greenbelt Management – Financial Instruments

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.

N/A – 100% Owner Equity Financing

## Protection of Proprietary Information Request

Greenbelt Management, LLC respectfully requests the information contained in the following pages titled as, marked as confidential, be given protection from Freedom of Information Act requests as it contains proprietary information. In particular, this section contains information regarding personal and company finances, which we believe to be personal and confidential.

The information contained in this bid for licensure by the Department of Consumer Protection is not subject to Freedom of Information Act requests pursuant to C.G.S. Section 1-210(b)(24), which exempts as follows:

“(24) Responses to any request for proposals or bid solicitation issued by a public agency or any record or file made by a public agency in connection with the contract award process, until such contract is executed or negotiations for the award of such contract have ended, whichever occurs earlier, provided the chief executive officer of such public agency certifies that the public interest in the disclosure of such responses, record or file is outweighed by the public interest in the confidentiality of such responses, record or file;”

In addition to the general exemption found in C.G.S. Section 1-210(b)(24), this information is also exempt from the Connecticut Freedom Of Information Act pursuant to C.G.S. Section 1-210(b)(8).

## Greenbelt Management – Financial Statements

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.

GREENBELT MANAGEMENT, LLC  
FINANCIAL STATEMENTS  
SEPTEMBER 30, 2013

**CONFIDENTIAL**

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**CONFIDENTIAL**

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# O'Connell, Pace, & Company, P.C.

## CERTIFIED PUBLIC ACCOUNTANTS

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E-MAIL: oconnells@opccpa.com

609 FARMINGTON AVENUE  
SUITE 201  
HARTFORD, CT 06105-3063  
(860) 247-3917

Walter F. O'Connell, C.P.A.  
Mario Pace, C.P.A.  
Albert Celentano, C.P.A.  
William Clark, C.P.A., M.S.P.A.

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### INDEPENDENT AUDITORS' REPORT

To the Members  
Greenbelt Management, LLC  
Fairfield, Connecticut

#### **Report on the Financial Statements**

We have audited the accompanying financial statements of Greenbelt Management, LLC (a Connecticut limited liability company), which comprise the balance sheet as of September 30, 2013, and the related statements of income and members' equity, and cash flows for the period from inception (December 21, 2012) to September 30, 2013, and the related notes to the financial statements.

#### ***Management's Responsibility for the Financial Statements***

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### ***Auditors' Responsibility***

Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditors' judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

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**CONFIDENTIAL**

*Opinion*

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Greenbelt Management, LLC as of September 30, 2013, and the changes in its net assets and its cash flows for the period from inception (December 21, 2012) to September 30, 2013 in conformity with accounting principles generally accepted in the United States of America.

Sincerely yours,

*O'Connell, Pace, + Company PC*

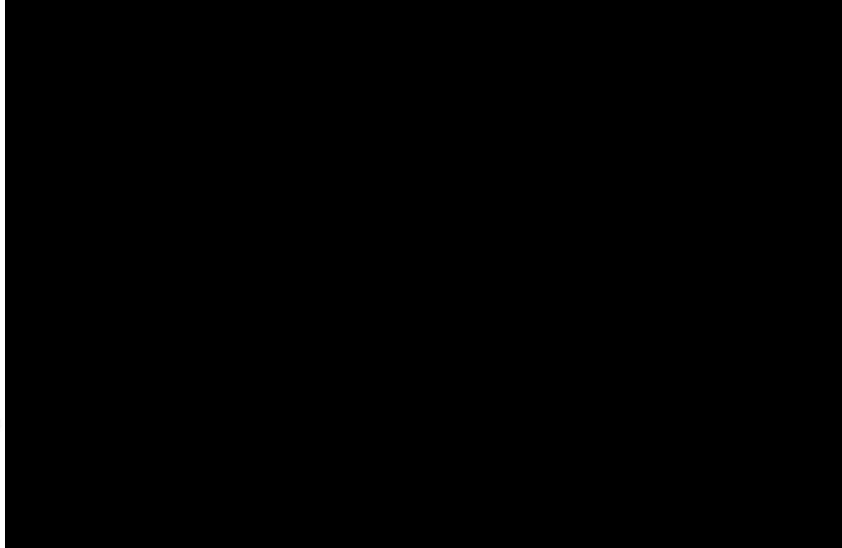
O'CONNELL, PACE, & COMPANY, P.C.  
Certified Public Accountants

November 12, 2013

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**CONFIDENTIAL**

GREENBELT MANAGEMENT, LLC  
BALANCE SHEET  
SEPTEMBER 30, 2013



See independent auditors' report and notes to financial statements

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**CONFIDENTIAL**

GREENBELT MANAGEMENT, LLC  
STATEMENT OF INCOME AND MEMBERS' EQUITY  
FOR THE PERIOD FROM INCEPTION (DECEMBER 21, 2012) TO SEPTEMBER 30, 2013



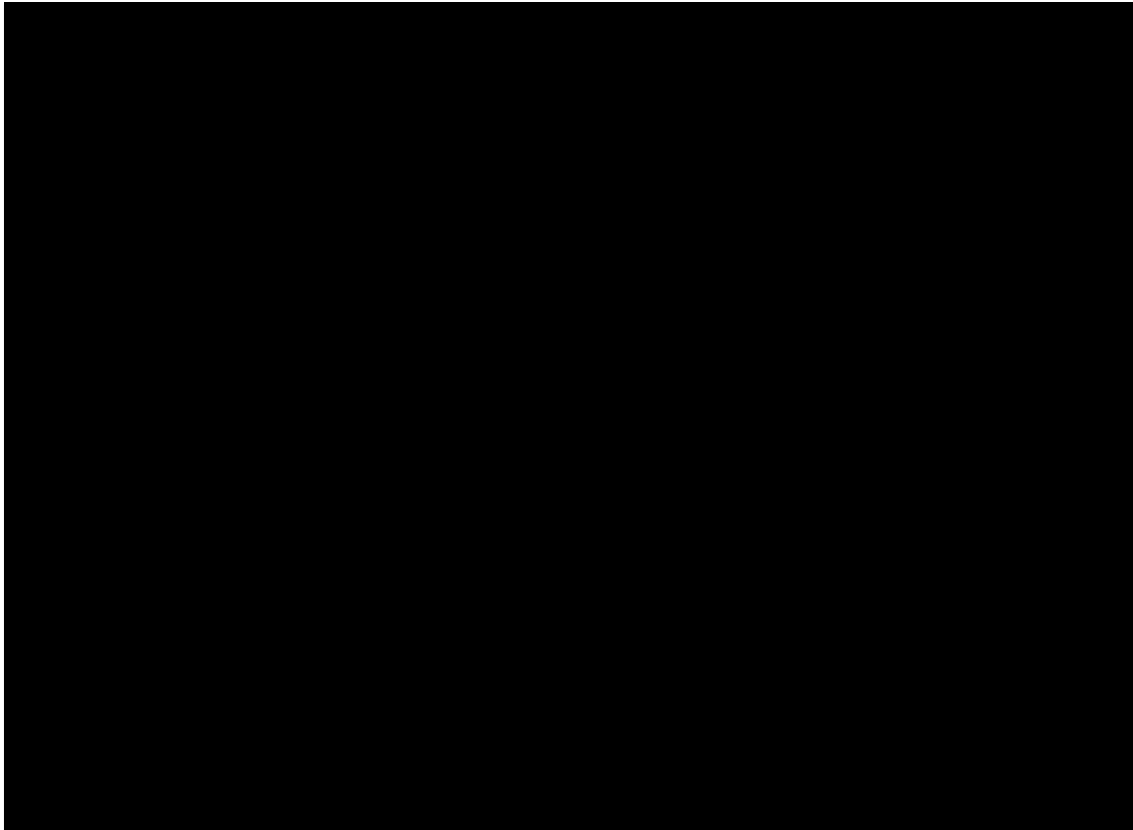
See independent auditors' report and notes to financial statements

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**CONFIDENTIAL**



GREENBELT MANAGEMENT, LLC  
STATEMENT OF CASH FLOWS  
FOR THE PERIOD FROM INCEPTION (DECEMBER 21, 2012) TO SEPTEMBER 30, 2013



See independent auditors' report and notes to financial statements

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**CONFIDENTIAL**

GREENBELT MANAGEMENT, LLC  
NOTES TO FINANCIAL STATEMENTS  
SEPTEMBER 30, 2013

NOTE 1 ORGANIZATION

Greenbelt Management, LLC is a Connecticut medical marijuana production startup which was organized in 2012. The Organization aims to obtain a medical marijuana production license from the State of Connecticut Department of Consumer Protection and develop a production facility in Middletown, Connecticut.

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Basis of Accounting

The financial statements of the Company are prepared on the accrual basis of accounting whereby revenues are recognized when earned and expenditures are recognized when incurred.

Income Taxes

Greenbelt Management, LLC, with the consent of its members, has elected under the Internal Revenue Code to be taxed as a partnership. Accordingly, the members are taxed on their proportionate share of the Company's taxable income. Therefore, no provision or liability for federal or state income taxes have been included in the financial statements.

Management believes the Organization has no uncertain tax positions as of September 30, 2013. The Organization's Federal Forms 1065, *Return of Partnership Income*, are subject to examination by the IRS, generally for three years after the returns were filed.

Cash and Cash Equivalents

For the balance sheet and statement of cash flows, cash and cash equivalents are defined as demand deposits and other investments, with purchased maturities of three months or less.

Fixed Assets

Fixed assets are recorded at cost. Acquisitions of property and equipment and expenditures for repairs, maintenance, renewals, and betterments that materially prolong the useful lives of assets are capitalized. Depreciation is provided on the straight-line method over estimated useful lives of the assets.

GREENBELT MANAGEMENT, LLC  
NOTES TO FINANCIAL STATEMENTS  
SEPTEMBER 30, 2013

NOTE 2 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES - (Continued)

Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions. This will affect the reported amounts of assets and liabilities, disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from these estimates.

Date of Management's Review

Subsequent events have been evaluated through November 12, 2013, which is the date the financial statements were available to be issued.

NOTE 3 SUBSEQUENT EVENT

The Company signed a lease in October 2013 to conduct its activities out of facilities that are leased under a five-year noncancelable operating lease. The lease shall commence on the first of the month immediately following the date of issuance of a license to Greenbelt Management, LLC for the production of medical marijuana by the State of Connecticut Department of Consumer Protection. Such license shall be secured on or before July 31, 2014. Failure to secure said license shall render the lease null and void. The lease contains a renewal option for an additional five-year period.

GREENBELT MANAGEMENT, LLC  
PROJECTED FINANCIAL STATEMENTS  
FOR THE TWELVE MONTHS ENDING  
DECEMBER 31, 2013, 2014, AND 2015

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# O'Connell, Pace, & Company, P.C.

## CERTIFIED PUBLIC ACCOUNTANTS

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Albert Celentano, C.P.A.  
William Clark, C.P.A., M.S.P.A.

---

Greenbelt Management, LLC  
Fairfield, Connecticut

We have compiled the accompanying projected balance sheets and the related statements of projected income and cash flows of Greenbelt Management, LLC (a Partnership) for the twelve months ending December 31, 2013, 2014, and 2015, in accordance with standards established by the American Institute of Certified Public Accountants.

The accompanying projections and this report were prepared for Greenbelt Management, LLC for the purpose of obtaining a license to produce medical marijuana from the Department of Consumer Protection and should not be used for any other purpose.

A compilation is limited to presenting in the form of a projection information that is the representation of management and does not include evaluation of the support for the assumptions underlying the projection. We have not examined the projection and, accordingly, do not express an opinion or any other form of assurance on the accompanying statements or assumptions. Furthermore, there will usually be differences between the projected and actual results, because events and circumstances frequently do not occur as expected, and those differences may be material. We have no responsibility to update this report for events and circumstances occurring after the date of this report.

*O'Connell, Pace, & Company, P.C.*  
O'CONNELL, PACE, & COMPANY, P.C.  
Certified Public Accountants

Hartford, CT  
November 12, 2013

GREENBELT MANAGEMENT, LLC  
PROJECTED BALANCE SHEETS  
DECEMBER 31, 2013, 2014, AND 2015

	<u>For the year ending December 31,</u>		
	<u>2013</u>	<u>2014</u>	<u>2015</u>
Current assets:			
Cash	\$ 78,430	\$ 65,545	\$ 3,250,752
Inventory	-	50,000	51,300
Total current assets	<u>78,430</u>	<u>115,545</u>	<u>3,302,052</u>
Property and equipment	197,697	1,218,908	1,218,908
Less: Accumulated depreciation	-	(97,529)	(195,058)
Net	<u>197,697</u>	<u>1,121,379</u>	<u>1,023,850</u>
Other assets:			
Escrow fund	2,000,000	2,000,000	2,000,000
Total	<u>2,000,000</u>	<u>2,000,000</u>	<u>2,000,000</u>
Total assets	<u>\$ 2,276,127</u>	<u>\$ 3,236,924</u>	<u>\$ 6,325,902</u>
Current liabilities:			
Accounts payable	\$ 7,127	\$ 7,077	\$ 7,182
Total current liabilities	<u>7,127</u>	<u>7,077</u>	<u>7,182</u>
Members' capital	<u>2,269,000</u>	<u>3,229,847</u>	<u>6,318,720</u>
Total liabilities and members' capital	<u>\$ 2,276,127</u>	<u>\$ 3,236,924</u>	<u>\$ 6,325,902</u>

See accountants' report

GREENBELT MANAGEMENT, LLC  
STATEMENTS OF PROJECTED INCOME  
FOR THE TWELVE MONTHS ENDING  
DECEMBER 31, 2013, 2014, AND 2015

	<u>For the year ending December 31,</u>			<u>Total</u>
	<u>2013</u>	<u>2014</u>	<u>2015</u>	
Sales	\$ -	\$ 928,518	\$ 4,732,806	\$ 5,661,324
Cost of sales				
Cultivation	-	509,374	672,552	1,181,926
Labor	-	270,816	395,364	666,180
Supplies and other	-	7,500	290,892	298,392
Total	<u>-</u>	<u>787,690</u>	<u>1,358,808</u>	<u>2,146,498</u>
Gross profit	<u>-</u>	<u>140,828</u>	<u>3,373,998</u>	<u>3,514,826</u>
Operating expenses:				
Professional	-	30,000	31,050	61,050
Depreciation and amortization	-	97,529	97,529	195,058
Postage and delivery	-	6,000	6,210	12,210
Travel and meals	-	18,000	18,630	36,630
Bank fees	-	3,000	3,105	6,105
Office supplies	1,000	6,000	6,210	13,210
License fees	-	100,000	100,000	200,000
Property taxes	-	19,451	22,391	41,842
Total	<u>1,000</u>	<u>279,981</u>	<u>285,126</u>	<u>566,105</u>
Net income (loss)	(1,000)	(139,153)	3,088,873	2,948,721
Members' capital at beginning of period	-	2,269,000	3,229,847	-
Contributions	2,270,000	1,100,000	-	3,370,000
Withdrawals	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>
Members' capital at end of period	<u>\$ 2,269,000</u>	<u>\$ 3,229,847</u>	<u>\$ 6,318,720</u>	<u>\$ 6,318,721</u>

See accountants' report



GREENBELT MANAGEMENT, LLC  
STATEMENTS OF PROJECTED CASH FLOWS  
FOR THE TWELVE MONTHS ENDING  
DECEMBER 31, 2013, 2014, AND 2015

	For the year ending December 31,		
	2013	2014	2015
Cash flows from operating activities:			
Net income (loss)	\$ (1,000)	\$ (139,153)	\$ 3,088,873
Adjustments to reconcile net income (loss) to cash provided by operating activities:			
Depreciation and amortization	-	97,529	97,529
(Increase) decrease in inventory	-	(50,000)	(1,300)
(Increase) decrease in escrow fund	(2,000,000)	-	-
Increase (decrease) in accounts payable	7,127	(50)	105
Net cash provided (used) by operating activities	<u>(1,993,873)</u>	<u>(91,674)</u>	<u>3,185,207</u>
Cash flows from investing activities:			
Capital expenditures	<u>(197,697)</u>	<u>(1,021,211)</u>	<u>-</u>
Net cash provided (used) by investing activities	<u>(197,697)</u>	<u>(1,021,211)</u>	<u>-</u>
Cash flows from financing activities:			
Members' contributions	<u>2,270,000</u>	<u>1,100,000</u>	<u>-</u>
Net cash provided (used) by financing activities	<u>2,270,000</u>	<u>1,100,000</u>	<u>-</u>
Net increase (decrease) in cash	78,430	(12,885)	3,185,207
Cash beginning of period	-	78,430	65,545
Cash end of period	<u>\$ 78,430</u>	<u>\$ 65,545</u>	<u>\$ 3,250,752</u>

See accountants' report

GREENBELT MANAGEMENT, LLC  
SUMMARY OF SIGNIFICANT PROJECTION  
ASSUMPTIONS AND ACCOUNTING POLICIES

NOTE A NATURE AND LIMITATIONS OF PROJECTIONS

These financial projections present, to the best of management's knowledge and belief, the Company's expected results of operations and cash flows for the projected period if it attains the projected sales volume. Accordingly, the projections reflect its judgment as of November 12, 2013, the date of these projections, of the expected conditions, and its expected course of action based on this assumption.

The assumptions disclosed herein are those that management believes are significant to the projections. Furthermore, even if the sales volume is attained, there will usually be differences between projected and actual results, because events and circumstances frequently do not occur as expected, and those differences may be material.

NOTE B SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Nature of Operations

Greenbelt Management's mission is to produce consistently high quality medical marijuana products to Connecticut licensed dispensaries, to advance medical marijuana research, and to be a business which makes positive contributions to the communities it operates in and serves.

*Our Product*

A range of medical marijuana strains and products produced in a state of the art facility according to exacting standards, free from pesticides and inorganic solvents and selected or formulated to meet the specific needs of patients with varying medical conditions and profiles.

*Our Community*

Medical marijuana cultivation centers have an obligation not only to the health and well being of the patients that use their medicine, but to their communities as well. It is Greenbelt's intention to be a positive force in the community and to regularly contribute both monetarily and physically to community projects and programs.

*Patients and Dispensary Clients*

To work diligently to respond to feedback from dispensary clients, research studies and Connecticut's medical marijuana patients to be constantly improving and advancing products.

See accountants' report

GREENBELT MANAGEMENT, LLC  
SUMMARY OF SIGNIFICANT PROJECTION  
ASSUMPTIONS AND ACCOUNTING POLICIES

NOTE B SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

*Our Team*

To provide training, support, clear expectations, high standards, and inspiration in a safe work environment. To continually develop an honest relationship built on mutual enthusiasm, communication, professionalism, and respect. Our team - ambassador of our mission and brand, is the essential link between product and community.

*Our Profits*

To maximize responsible, profitable growth while maintaining integrity towards our products, customers, staff, community and environment.

Basis of Reporting

The accompanying projections have been prepared on the accrual method of accounting. Accordingly, revenues are recognized as earned and expenses are recognized as incurred.

Inventory

Inventory consists of a range of medical marijuana products and is stated at the lower of cost or market using the first-in, first-out (FIFO) method.

Accounts Payable

Accounts payable represent obligations incurred by the Company, but not settled as of the accounting period. These consist of vendor invoices for direct costs such as inventory and supplies. Projected accounts payable were based on historical industry data.

Depreciation and amortization

Depreciation expenses have been calculated over the useful lives of the assets. Repairs to the assets have been deducted as operating expenses.

Income taxes

Greenbelt Management, LLC is a Limited Liability Company taxed as a Partnership. The Company itself is not a taxpaying entity for the purposes of federal and state income taxes. Income taxes of the Company are computed on the total income from all sources, accordingly, and no provision for income taxes is made in these financials.

See accountants' report

GREENBELT MANAGEMENT, LLC  
SUMMARY OF SIGNIFICANT PROJECTION  
ASSUMPTIONS AND ACCOUNTING POLICIES

NOTE C      SALES

The Company projected its sales based on its survey of the historical industry data and current market conditions. The sales for the twelve months ending December 31, 2013, 2014, and 2015 were adjusted to account for startup expenses and customer development. The sales for the twelve months ending December 31, 2012 and 2013 were projected with a significant incline to arrive at normal operating conditions.

NOTE D      COSTS OF SALES

The cost of sales consists of cultivation, occupancy, labor, utility, and other costs related to production. The Company estimated the cost of sales percentages based on historical industry data and current market conditions.

NOTE E      FUNDING OF OPENING AND START UP OPERATIONS

Upon issuance of a license to develop and operate a medical marijuana facility from the Connecticut Department of Consumer Protection, the Company will execute transactions with its members to effectuate the necessary funding. The two members are Jason Nickerson and Matthew Nickerson. It is anticipated that, at this time, the two members will make equity contributions of equal amounts in order to fully fund the opening and start up of the operations of Greenbelt Management, LLC.

Greenbelt Management – Applicant Tax Returns

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.

N/A

Tax Returns submitted but not  
subject to FOI request

## Protection of Proprietary Information Request

Greenbelt Management, LLC respectfully requests the information contained in the following pages marked confidential, be given protection from Freedom of Information Act requests as it contains proprietary information. In particular, this section contains information regarding personal and company finances, which we believe to be personal and confidential.

The information contained in this bid for licensure by the Department of Consumer Protection is not subject to Freedom of Information Act requests pursuant to C.G.S. Section 1-210(b)(24), which exempts as follows:

“(24) Responses to any request for proposals or bid solicitation issued by a public agency or any record or file made by a public agency in connection with the contract award process, until such contract is executed or negotiations for the award of such contract have ended, whichever occurs earlier, provided the chief executive officer of such public agency certifies that the public interest in the disclosure of such responses, record or file is outweighed by the public interest in the confidentiality of such responses, record or file;”

In addition to the general exemption found in C.G.S. Section 1-210(b)(24), this information is also exempt from the Connecticut Freedom Of Information Act pursuant to C.G.S. Section 1-210(b)(8).

Greenbelt Management – Producer Backer Tax Returns

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.



Kayvan Khalatbari is the co-founder and director of Denver Relief Consulting (DRC). Mr. Khalatbari has been appointed Project Manager to Greenbelt, and DRC has been retained to provide cultivation, manufacturing, and operational guidance. Mr. Khalatbari is a principal in a successful Colorado dispensary and has overseen the design and development of several medical marijuana operations over the last four years. His years of experience in an electrical engineering firm prior to beginning his enterprise, lends Greenbelt Management with the technical expertise needed to design a functional and efficient cultivation and manufacturing space. He is able to advise and train his clients in all accepted commercial cannabis cultivation methodologies, organic and otherwise. DRC will provide cost and yield projections and reliable production recipes, enhancements, and mitigation measures to base company protocols and staff procedures.

Mr. Khalatbari will work with the owners of Greenbelt Management to establish best practices, functional and efficient designs, standards, and protocols for all phases of production operations. Consulting with our Plant Science Advisor, Dennis Depaolo, Greenbelt Management will seek to categorize, isolate, enhance, and produce those strains of commercial grade marijuana showing the greatest therapeutic and palliative characteristics, value and cannabinoid profiles in a perpetual cycles to provide for our patient population.

Greenbelt Management believes in a holistic approach to quality control, beginning with our facilities and employees themselves. High standards of sanitation, safety, and best practices to mitigate normal environmental contaminants and other threats to cultivation will be enacted and overseen by our Best Practice Consultant, Jill Lamoureux. Ms. Lamoureux will work with the management and production staff to establish thorough policies and procedures, record keeping, and batch tracking protocols to document quality production levels and conversely, traceability and proven corrective action plans when a substandard outcome or condition is discovered.

The production operation will employ standard High Intensity Discharge artificial light modeling for propagation. There will be 42 metal halide fixtures in propagation and vegetative spaces, and flowering areas of the facility will house 256 high pressure sodium fixtures in four separate cultivation bays. A hybrid cultivation system will be implemented utilizing an organic media and soil mix. A sustainable coco base is used for all vegetative and flowering plants. Feeding schedules are designed so that nutrient from the soil and organic fertilizers are taken up by the plant leaving only trace minerals remaining in the media. A drip table system and demand feeding schedule replaces traditional ebb and flow systems so that no waste water is disposed to the municipal drainage system. Greenbelt plans to establish operations upon licensing in a 15,000 square foot facility leased from the city of Middletown, Connecticut with an option for an additional contiguous 15,000 square feet.

Greenbelt Management also intends to offer a suite of topical and ingestible cannabis products for those who prefer or are not able to smoke. Various forms of cannabinoid extraction result in compounds commonly referred to as hash and or concentrate. Ancillary products made with extracted cannabinoids are typically referred to as Marijuana Infused Products, or MIPS. The methods of production of MIPS is primarily the practice of isolation of the therapeutic components of marijuana by the following principal methods of extraction; water, food-grade Butane and super or subcritical CO2 extraction. These processes will produce a concentrate of various purities and potency, and typically cost is correlated to the level of refinement. Manufacturing concentrates are a key to providing functional alternatives to traditional smoke ingestion methods, especially for the most debilitated among the patient population. A side benefit is that these processes also represent efficiencies to the medicinal marijuana operation in that they utilize the trimming remnants from mature marijuana flowers that might otherwise be classified as waste to be disposed of yet in fact still contains significant valuable and useful levels of active cannabinoids once properly extracted. This process should and will be further refined by employing a decarboxylation procedure. Decarboxylation is a simple process by which the raw material to be used for extraction is prepared and heated at low heat to convert latent cannabinoids into their active states and counterparts, significantly enhancing potency.

An extensive set of policies and procedures will be implemented refined by the team. A wide range of production protocols will be addressed. A draft version of the protocols can be found in Exhibit F.1. and will undergo continual improvement as operations develop.

Exhibits

Exhibit C. – Draft Cultivation Procedures

Exhibit C. – Draft Manufacturing Procedures

## Greenbelt Management – Product Safety

1. A detailed description of how the applicant's growing protocol will produce a plant free of mold, disease, heavy metals and other contaminants.

Greenbelt Management will adhere to standards and procedures for quality control that will ensure the production and processing of pharmaceutical grade marijuana. Operations will be in full compliance with Department regulations and mandatory testing requirements. In the event that a recall is warranted as determined by Greenbelt Management, the Department, or other public agency, we will be prepared to execute a withdraw or recall immediately. Our procedures require that employees perform mock recalls at least two times per year in order to identify problems in the protocols. A draft of Greenbelt Management's quality control and recall procedures can be found in Exhibit G.1. At a minimum, the final policies and procedures will address the following areas:

Quality control measures in processing operations.

- The cultivation manager must ensure that all crops are evaluated for quality during processing and receive laboratory testing in accordance with the Department mandates.
- Cultivation employees working in processing operations must be trained to identify signs of contamination and sub-standard product. The general manager must approve the disposal of any crops.
- Two or more trained employees must perform a visual microscopic and naked-eye inspection of each crop processed to determine:
  - Organoleptic characteristics (color, texture and odor);
  - Presentation of the material (raw, cut, crushed, compressed);
  - The presence of admixtures, foreign matter (sand, glass particles, dirt), mold, or signs of decay;
  - The presence of insects; and
  - The presence of foreign material originating from poor or degraded containers.
- All crops are to be inspected by two or more trained employees for all visible foreign matter and sub-standard material to be removed.
- Foreign matter includes:
  - Plant material from other strains/species or from other parts of the harvested strains/species;
  - Soil and rocks;
  - Insects; and
  - Wire, glass, paper, tools or tool parts, and other man-made objects.
- Sub-standard material includes, for example:

- Discolored leaves or flowers;
  - Evidence of mold; or
  - Any other material that would cause the crop to fail to meet its specifications as determined by the general manager or cultivation manager.
- The inspection for foreign matter and sub-standard material must be conducted while the crop is sufficiently well displayed on a sanitary surface by two or more employees to allow for sufficient visibility (e.g., on a conveyor, or spread out on tables, screens, or tarps).
  - Damaged and/or degraded plant material must be removed and disposed of with general manager approval and in accordance with Department regulations.

Representative and analytical samples.

Our current sampling protocol is adapted from the World Health Organization protocols for sampling medicinal herbs. As the Department issues additional guidance in this area, our procedures will be updated accordingly.

- Representative samples sufficient in size shall be taken from each batch (each strain must be tested) by the general manager.
- Analytical samples must be taken in accordance with our quality control protocols.
- Representative samples must be properly recorded in the inventory management system and held in a secured storage area for one year.
- Sample records must accurately reflect the origination of the sample to allow trace-back.
- Samples shall be labeled with the contents by the plant name and identification; the date of harvest; the identification number; and any other identifying information and stored separately from product inventories in a manner that maintains sample quality and identification.

Pest control procedures.

- The cultivation area must be designed, maintained, and monitored to restrict pests, including insects, rodents, and other animals. The cultivation manager must ensure that pest management activities comply with our policies and procedures to ensure worker and product safety.

Spray and feeding protocols required.

- The general manager must maintain a current a plant spraying and feeding protocol. Each cultivation employee must review the spraying and feed protocols daily.

- Each employee is responsible for following the established protocol unless otherwise directed by the cultivation manager. Any variance from the published protocol must be recorded in the Procedure Variance Log.
- Records of published protocols should be maintained for twenty-four months at a minimum.
- The protocol must detail for each strain in production:
  - Product to be applied.
  - Reason for application.
  - Method of application.
  - Frequency of application.
  - Next scheduled date of application.
  - Employee responsible for next application.
  - Status of lights, HVAC, and air circulation during application (i.e. lights on, HVAC off, and fans off).
  - PPE required for application (i.e. mask required, Tyvex suit optional).
  - Restrictions preventing application (i.e. do not apply within four hours of any foliar application).
  - Life Cycle Stage restrictions - (i.e. apply in vegetative state only or may be applied in all stages).
  - Re-entry intervals.
  - Posting requirements.
  - Other precautions (i.e. cover medium).

#### Cultivation Environment.

All necessary precautions must be taken during the cultivation and processing of marijuana to prevent contamination of marijuana and packaging materials. These safeguards include, but are not limited to:

- Cleaning and sanitizing all equipment, containers, and other contact surfaces as necessary;
- Controlling airborne contamination;
- Using sanitary handling procedures;
- Washing or cleaning containers and packaging components that contain soil or other contaminants;
- Using safe water in all operations;
- Performing chemical, microbiological, or other testing, as necessary to prevent the use of contaminated ingredients in cultivation and processing operations;
- Sterilizing, pasteurizing, freezing, refrigerating, heating, pressurizing, controlling hydrogen-ion concentration (pH), controlling humidity, controlling water activity (aw), or using any other effective means

to remove, destroy, or prevent the growth of microorganisms and prevent marijuana product decomposition;

- Storing packaging materials, in-process marijuana, and marijuana products appropriately to prevent contamination and adulteration;
- Preventing cross-contamination and mix-ups between contaminated or adulterated marijuana and clean marijuana; and
- Using effective measures to protect marijuana products against adulteration by plastic, glass, metal, or other foreign materials when at risk due to processing equipment or materials.

Quality control measures in cultivation operations.

The general manager must establish visual surveillance schedules for each crop in cultivation. Detailed visual surveillance of each crop must be performed and documented weekly at a minimum. Cultivation employees performing surveillance must look for and record findings for the cultivation area assigned. The following items should be included in surveillance operations:

- Signs of pest infestations.
- Changes in biological colonies.
- Mold and mildew.
- Leaf and tip burn, discoloration, and spotting.
- Changes in appearance of the media.
- Changes in stalk density and branch elasticity.
- Regular in-house testing must be scheduled by the cultivation manager based on current operational needs and recorded in the Crop Maintenance Log. Tests that must be performed include:
  - Soil pH.
  - Nutrient pH, Total Dissolved Solids (TDS), and Electro-Conductivity (EC).
  - Soil EC/pH testing using a saturated media extraction (1 part soil to 2 parts water filtered) or the leachate pour-through method.

Exhibits.

Exhibit C - Draft Cultivation Protocols

Exhibiti C. - Draft Manufacturing Protocols

2. An explanation of how the applicant will limit employee exposure to potentially unsafe chemicals or other unsafe conditions.

The safety of our employees is Greenbelt Management’s first priority. The cultivation manager must identify and mitigate department specific safety considerations. Cultivation facilities have a high risk for electrical hazards, low-toxicity pesticide, and mold contamination. The cultivation manager, in coordination with the general manger, shall schedule regular infrastructure and equipment maintenance in order to reduce fire risk and other potential hazards. Other than electrical hazards, few exposures in a cultivation facility are expected to cause significant exposure risks.<sup>1</sup> Safety procedures shall develop a culture of safety in the cultivation facility.

**Personal protective equipment (PPE).**

- The cultivation manager must implement and maintain a PPE program. The program must be compliant with OSHA and EPA standards and address:
  - Hazards present;
  - Selection, maintenance, and use of PPE;
  - Training; and
  - Monitoring.
- Cultivation employees must be provided appropriate personal protective equipment and training and trained in decontamination procedures.
- Upgraded PPE must be immediately provided if any change in facility status results in dangerous exposures to cultivation employees.
- Standard PPE required for all cultivation employees includes:
  - Accessible eye wash stations with sufficient quantities of potable water.
  - Uniforms with some level of fire resistance.
  - Chemical resistant gloves.
  - Boots with water resistance and slip protection.
  - N-95 or P-100 disposable respirators.
  - A full-face air purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional, is required for employees with beards or performing substance spray applications.

<sup>1</sup> Martyny, J., VanDyke, M., Schaeffer, J., & Serrano, K. (2012). Health Effects Associated with Indoor Marijuana Grow Operations.

- Tyvex coveralls for employees performing substance spray applications.

Chemical spill response.

- All cultivation employees must be appropriately trained on spill response. Every employee is responsible for participating in spill response activities.
- A fully stocked spill kit must be maintained in the cultivation facilities. Areas with high spill risk should be stocked with a mobile spill kit for immediate mitigation.
- Inform the cultivation manager immediately. The cultivation manager or general manager must notify necessary parties.
- The cultivation manager shall determine the severity of the spill and the toxicity of the chemical and execute the appropriate response.
- Remove all non-critical employees from the spill area and address any immediate medical needs.
- Contain the spill. Use necessary PPE. Containment solutions include absorbents and rubber dams.
- Place necessary notifications at areas of entry to the spill area.
- Dispose of all hazardous waste in accordance with manufacturer instructions and state and local laws.
- Decontaminate the spill area in accordance with the MSDS and manufacturer instructions.



## Greenbelt Management – Marijuana Transport

### 1. Provide a detail description of the proposed method of transportation of marijuana and marijuana products.

The owners will solely be responsible for the transportation of Greenbelt Management's products to licensed facilities. Greenbelt Management will arrange deliveries twice a month per dispensary and may adjust the delivery schedule to meet the needs of the licensed dispensary facilities and their patients. As demand requires additional delivery personnel, managers will be allowed to transport in two-person delivery routes. All deliveries will be handled in accordance with Department regulations.

#### **Transportation Procedures**

Authorized delivery personnel required.

Two managers are required for each delivery and must carry their registration card at all times and provide it to authorities upon request. One employee must stay with the vehicle at all times when marijuana is present in the vehicle.

Shipment verification.

- Prior to transport two employees must weigh, inventory, and account for on video and in the inventory system all marijuana products transported.

Manifest required.

- The general manager responsible for packaging a delivery order must complete a shipping manifest in a form and manner determined by the Department, for retention by the origination location, carry a copy of the manifest with the products being transported, and obtain an original signature from the recipient; and
- Securely transmit a copy of manifest to a receiving dispensary.
- Hard copies of shipping manifests must be retained for no less than one year and made available to the Department upon request.

Loading areas.

- Areas used to load medical marijuana products for transportation are limited access areas and must be secure. The general manager must ensure and maintain security in all loading areas. Greenbelt

Management shall secure any loading areas with physical barriers guarding against unauthorized access to the area.

- Access control points must include the positive identification of all employees and service providers at all points of entry.
- The alarm system must provide silent alarm capability and full coverage video surveillance of all loading areas.
- The general manager in coordination shall authorize access to loading areas and issue employee keys and codes.

Transportation vehicles.

- Any vehicle used to transport marijuana must have a secure, locked storage compartment that is part of the vehicle. The general manager must ensure all transportation vehicles are compliant prior to authorizing a transfer to the vehicle.
- Any vehicle used for transportation of marijuana may not bear any markings that indicate the vehicle is being used to transport marijuana or that indicates the Greenbelt Management name.
- Each vehicle used for transport of marijuana shall have a global positioning system monitoring device that is monitored by an employee at the production facility during transport.
- No marijuana may be visible from the outside of the vehicle and vehicle must be maintained in accordance with all state motor-vehicle laws.

Route planning.

- No extraneous stops may be made when transporting marijuana.
- The general manager shall ensure that all delivery times and routes are randomized.

Geographic risk.

- The general manager in coordination with law enforcement and third-party security advisors shall identify “security risk geographies” with respects to local crime rate, educational system, political and legal conditions hindering or supporting cargo theft.
- Deliveries to high risk geographies must be approved by the general manager.

Cargo theft prevention measures.

The general manager shall employ best practices updated as often as possible to mitigate cargo theft risk. The general manager shall have the authority to employ an approved third-party advisor to assist in the development of policies and procedures. Cargo theft prevention measures include, but are not limited to:

- Strategically partnered transport teams;
- Regular employee briefings focused on awareness;
- Risk-based route planning;
- Active vehicle monitoring using GPS tracking systems;
- Secure radio or satellite communication equipment is required to communicate with personnel at the delivery origination point at all times when the vehicle contains marijuana.
- Utilization of hidden GPS locators in shipping containers; and
- Use of escort vehicles for high-risk deliveries.

Two-Way Radio Communication.

Each delivery vehicle must be equipped with two-way radio communication equipment. The general manager will ensure the system is operational and each dispensary agent who transports marijuana is trained appropriately on its use. Dispensary agents must adhere to the following procedures whenever using radio equipment:

- The “Transportation” channel may only be used for transportation operations.
- The transporting vehicle must perform a radio check-in every hour on hour (X:00). The manager or their designee at the facility shall copy. In the event of a hostage situation, if able, the manager should indicate “Code 0100” if the facility is not previously aware of the hijacking.
- The employee receiving a “Code 0100” transmission must notify authorities immediately of the vehicle’s location, occupants, and contents.
- If any suspicious activity occurs during transport, the manager shall maintain radio communication during the event to report all details to the facility.
- If two-way radio communication fails for any reason, the dispensary agent should make contact by cell phone or land-line immediately after a communication fails.

Transportation Reporting Required.

The general manager shall be responsible for reporting all transportation events.

## Greenbelt Management – Employee Working Environment Plan

1. Employee Working Environment Plan: 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.

Greenbelt Management is an independently owned and operated business. We are committed to creating a positive and healthy environment for all of our staff. Employee retention is a primary goal of our staffing plans. We are a small operation that requires outstanding performance from all of our employees. Additionally, we have executed a neutrality agreement with UFCW Local 371 so that our employees may explore the benefits of union membership and make a determination on participation. We have begun development of an extensive employee policy manual, which will detail our employment policies including:

Management philosophies.

Greenbelt Management pledges to its employees that as long as the affairs of the company are in our hands, the following principles will govern our actions with employees.

- Greenbelt Management employees and their welfare are very important to the success of our company. Our long-range objective is the continuous development of a growing and prospering business through which both the employees and the company will benefit.
- It is our policy to work with all members of our team in a fair and friendly manner and to treat each team member with dignity and respect as well as pay all employees a living wage.
- The management of Greenbelt Management will work continually for the benefit of our present and prospective patients as well as our employees to improve the position of our company. This will enable us to provide excellent jobs for our team members.
- Work priorities such as accuracy, safety, cleanliness, and employee accommodations will be evaluated periodically for possible improvement and will always compare favorably with good industry practice.
- We will devote our best effort to conducting an expanding business within which will prevail an atmosphere of harmony with opportunity for all employees of Greenbelt Management.

Benefits.

- Employees will receive paid time off after one year of service.
- We expect that health insurance benefits will be offered in the second year of operation.

Employee safety and security.

- All employees will be provided on-going training on safety and security issues and will be provided with all resources necessary for a safe and secure working environment.
- No employee shall ever be required to operate or close the facility alone.
- The facility and all security equipment will be maintained and in good working order at all times.

Employee educational opportunities and training:

Greenbelt Management will provide its employees' regular training and professional certification training cover the following areas:

- Local, state and federal marijuana laws;
- Medical marijuana efficacy and recent research;
- Patient confidentiality, education, and care;
- Personnel, product, and premise security; and
- Record keeping and regulatory responsibilities.

Standards of conduct.

Greenbelt Management will exist in a highly regulated area of healthcare provision. Our employees will be both our greatest assets and greatest liabilities. We will implement very strict standards of conduct. Cause for termination may include:

- Theft or inappropriate removal or possession of property;
- Falsification of timekeeping records;
- Falsification of patient or sales records;
- Working under the influence of alcohol or illegal drugs;
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace;
- Fighting or threatening violence in the workplace;
- Boisterous or disruptive activity in the workplace;
- Negligence or improper conduct leading to damage of company-owned or patient-owned property;
- Insubordination or other disrespectful conduct;
- Violation of safety or health rules;
- Smoking in the workplace;

- Sexual or other unlawful or unwelcome harassment;
- Excessive absenteeism or any absence without notice;
- Unauthorized use of telephones, or other company-owned equipment;
- Using company equipment for purposes other than business (i.e. playing games on computers or personal Internet usage);
- Unauthorized disclosure of business practices or confidential information;
- Violation of personnel policies;
- Unsatisfactory performance or conduct; or
- Bringing or allowing weapons on-site.

## Greenbelt Management – Compassionate Need Plan

2. Compassionate Need Plan: Describe any compassionate need program you intend to offer. Include in your response: 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 general applicant; and Any other information you think may be helpful to the Department in evaluating your compassionate need program.

Greenbelt Management's first priority is to produce safe and effective medical marijuana for approved Connecticut patients. Our second priority is to ensure they have access to those products. Traditional health care costs are a tremendous burden to the patient population, while medical marijuana products are yet another layer of unreimbursable and uninsurable expense.

As a producer, we are limited in our options for providing savings directly to patients. As a result, we will partner with dispensaries who will extend discounts to their patients based on the discounts we provide to them. We have initiated discussions with Blue Point Apothecary and Thames Valley Apothecary should either receive a license. Furthermore, we will work with any dispensary as long as they have a solid financial assistance need program in place that ensures the right patients are receiving fair benefits. We will require that the dispensaries extend 100% of our discount to their patients and that they maintain records for auditing if we suspect a problem exists.

Given our projections, we believe that we are able to provide up to fifteen to twenty-five percent of our products at cost to dispensaries for their compassionate need program, for those patients who have a verified level of indigence, to be determined. Once we have reached a stable position with sufficient reserves to provide expansion funds and emergency working capital funds, we closely examine expanding the program. We will explore with our dispensary partners the best expansion at that time considering whether additional at-cost medicine or the addition of reduced or free cost products to the program would benefit the greatest number of patients in need.

## Greenbelt Management – Research Plan

3. Research Plan: 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: 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.

Greenbelt Management is truly excited about the ability to participate in progressing the field of medical marijuana research. We are limited in our capacity to provide patient level research. We have begun to explore the Research Plan concept presented by the Connecticut Pharmacy Association and will determine if our participation would be beneficial upon review of the plan documents and details. We will have a strong team of advisors and consultants in place with the requisite skills sets needed to execute research on product development. Denver Relief Consulting has executed several product development projects including nutrient testing and light science tests with esteemed NASA scientist, Neil Yorio. In conjunction with Dennis Depaolo, our Plant Science Advisor, Greenbelt Management has developed the following research plan to implement with Denver Relief Consulting.

### Greenbelt's Research Vision.

At Greenbelt Management our mission is to advance the efficacy of cannabinoid-based medications by targeting specific debilitating medical symptoms and minimizing adverse side effects to the furthest possible extent. We aim to develop and produce plant-based products that will provide desired alternatives to narcotic palliatives, and to seek collaborations and cost effective methods of production that will meet the needs of an emerging market. To that end, Greenbelt Management intends to refine a portfolio of cannabinoid medicines via its own in-house research as well as through outsourced research collaborations. The company will strive to advance all aspects of the cannabinoid product development process—from botanical research and extraction technology to the formulation of improved drug delivery methods, and will rely upon the results of internal and external clinical trials and studies to do so. As medical marijuana research efforts become more widely acceptable and practiced, Greenbelt will be front and center in an effort to further our understanding of the science behind this plant's effects and how it can be used to best serve the patients of Connecticut and beyond.



Two Sides to the Sciences.

Greenbelt will focus on plant-based sciences and product development by integrating newly defined academic and medical research, which will be guided at the advisement of Plant Science Advisor, Dennis Depaolo. To better develop these products it is imperative to support research aimed at developing a robust understanding of the endocannabinoid system, which is where we intend on directing our focus. We believe that the following two components of medical marijuana require the utmost attention as the medicinal cannabis industry begins to develop.

1. Cannabinoids and Receptor Ligands- Cannabis sativa is the only known plant to produce 21-carbon compounds known as phytocannabinoids, over 60 of which have been identified to date (Izzo et al., 2009). Synthetic cannabinoids are relatively easy to produce at low cost, however when administered as purified medical pharmaceutical grade products such as dronabinol (Marinol) much of the drug's efficacy was lost as compared to cannabis-based natural products (Russo, 20011). The reason behind this observation stems from the fact that there are multiple compounds produced by the cannabis plant, which in conjunction with one another can have a profound effect on the endocannabinoid system. One terpene acts as agonists of the CB2 receptor. The bicyclic sesquiterpene,  $\beta$ -caryophyllene, which is a plant volatile very frequently found in plants, has been shown to selectively target the CB2 receptor at nM concentrations ( $K_i = 155$  nM) and act as a full agonist (Gertsch et al., 2008). Remarkably,  $\beta$ -caryophyllene is also a major compound in Cannabis sativa essential oil and unlike many polyphenolic natural products, is not metabolized immediately. Thus, Cannabis produces two entirely different chemical complexes able to differentially target CB receptors. Interestingly other compounds known as flavonoids, which are essentially polyphenols inhibit fatty acid amide hydrolase (FAAH), which is the enzyme responsible for the breakdown of the endogenous CB receptor ligand anandamide, though they do not significantly bind cannabinoid receptors (Thors et al., 2007, 2008). Dissecting these compounds and understanding their biosynthesis in the plant will lead Greenbelt Management to develop improved cultivars, which can be used for extractions and translated into targeted therapeutics.

As Greenbelt Management is a medical marijuana producer, we will focus on developing new cannabinoid ratios, new products and specific delivery methods to enhance pharmacokinetic effects such as improved solubility or bioavailability. Greenbelt Management is dedicated to supporting both internal and external research that aims to benefit patients though developing a more precise medication to each patient's individual needs. We at Greenbelt

understand how cannabis produces these cannabinoids through our robust plant scientific advisement and can control this production through targeted breeding programs, which we plan on implementing in effort to create specific medications similar to multiple sclerosis pharmaceutical SATIVEX (50:50 THC:CBD) and epileptic pharmaceutical Epidiolex (>98% CBD), which have been produced by GW pharmaceuticals of the United Kingdom.

2. Endocannabinoid System- The endocannabinoid system is a complex system of endogenous receptors and their respective ligands throughout the central and peripheral nervous system, which help regulate functions of the body such as appetite, pain, mood, and memory. The endocannabinoid system was discovered in 1990 (Matsuda, et al., 1990). Since that time, research has focused on the discovery of which specific receptors are involved and the ligands that modulate receptor activity giving rise to a physiological response.

Several receptors respond to cannabinoid ligands. To date 2 cannabinoid receptors (CB1 and CB2) have been identified and well characterized (Matsuda, et al., 1990). Another 3 receptors (GPR18, GPR 55, GPR119) are currently under investigation (McHugh, 2008). CB1 is located primarily in the central and peripheral nervous system and exhibits both positive and negative allosteric modulation. The CB2 receptor is located in the immune system tissue and immune cells. CB2 has a variety of modulatory functions, including immune suppression, induction of apoptosis, and induction of cell migration (Basu et al. 2011). Through the endocannabinoid system we have seen reduced seizures in childhood epileptics through administration of CBD, though this data is largely anecdotal. We have seen reductions in spasticity and pain with administration of Sativex (50:50 THC:CBD) (Barnes, et al., 2006). We have seen both THC and CBD prevent metastasis of aggressive breast cancers (McAllister et al., 2010) and we have seen THC's ability to regulate blood sugar levels (Wargent, et al., 2013). These diverse properties of the phytocannabinoids on the endocannabinoid system promote significant interest in the potential for plant-based therapeutics.

Medical Cannabis Research in the United States.

Today in the United States to complete any cannabis based study one must obtain a permit from the DEA and receive the cannabis used in the studies through the National Institute of Drug Abuse (NIDA). Studies have been completed through these avenues (Abrams, 2011; Ware et al., 2006). These studies have been few and far between and have been extremely difficult to obtain. Therefore Greenbelt Management opts to support academic and medical research, which is the basis for assimilating our understanding of the endocannabinoids system and using that knowledge to develop new targeted therapeutics.

Recently there has been movement from the Federal Government on the subject of medical cannabis. In January 2012 Americans for Safe Access filed an appeal to remove Cannabis sativa from Schedule I in with the D.C. Circuit, which was heard on October 16, 2012. Although the request was denied, on August 29th, 2013 the Jack Cole from the Department of Justice released a memo stating that it will not be top priority to use federal resources in pursuit of marijuana facilities that are directly in compliance with state regulations and laws. In October 2013 the FDA approved an Investigational New Drug (IND) study. The U.S. Food and Drug Administration is now allowing studies of purified CBD (cannabidiol) as an anti-seizure medication. The “new drug” is being provided to physician-investigators by GW Pharmaceuticals of the United Kingdom, which has named its CBD product Epidiolex.

Additionally, Epidiolex has been approved by the FDA as a pure form cannabinoid. The drug consists of more than 98 percent CBD, trace quantities of some other cannabinoids, and zero percent THC. GW Pharmaceuticals will provide two strengths to the physician-investigators: 25 milligrams per milliliter, and 100mg/ml. In preclinical trials the effects of CBD and CBDV were not mediated by the CB1 cannabinoid receptor (Hill et al., 2013), indicating that much more research is needed to understand this drug’s mode of action. To date the FDA has approved intermediate-sized INDs sponsored by Orrin Devinsky, MD, at the NYU School of Medicine, and Roberta Cilio, MD, PhD, at UCSF. Each team is set up to follow 25 patients using Epidiolex as a treatment for pediatric epilepsy.

As medical marijuana and cannabinoid-based medications are fairly new to the pharmaceutical field much research is still required to obtain a more complete understanding of the cannabinoids and their perspective receptors. There appears to be much plasticity of symptom relief when using cannabinoid-based medications, both within dosage effects as well as the variety of conditions of which cannabinoids can treat.

Greenbelts Research Collaborations and Endowment Fund.

In effort to obtain our objectives Greenbelt Management will be creating an endowment fund to support local and nationally based academic and medical research in the field of cannabinoid based medicine. To establish this endowment fund Greenbelt will be donating 5% of its annual net profit to support ongoing cannabinoid based research within the United States. Greenbelt Management is devoted to supporting top-tier pharmacological research on the endocannabinoid system and understanding the mechanism of action stemming from what is currently anecdotal evidence of relief from specific medical conditions. Greenbelt’s endowment to support national research will not only enable development and growth of the industries pharmacological understanding of these drugs but also support research that will allow for the development of more precisely targeted medications. Our over-reaching goal is to be able to develop unique and regulated cannabinoid based medications with specific

delivery systems to target a variety of medical conditions similar to what has been done with Sativex (nabiximols) in the United Kingdom for multiple sclerosis (MS) patients. (Nurmikko et al., 2007).

Greenbelt Management's understanding of the pure and applied pharmacology of new cannabinoids will be brought to light through collaborations with local cannabinoid scientist, Dr. Douglas McHugh. Dr. McHugh is a founding faculty member at the Frank H. Netter MD School of Medicine, Quinnipiac University, North Haven, CT. Dr. McHugh is a member of the International Cannabinoid Research Society (ICRS) and studies the G protein-coupled receptor GPR18 and its role within the endocannabinoid system and microglia.

The Frank H. Netter MD School of Medicine opened its doors at Quinnipiac this year and will be host to studies on the endocannabinoid system. Dr. Douglas McHugh will open his lab in 2016 and will focus his efforts on a new cannabinoid receptor GPR18. GPR18 may soon be categorized as the CB3 receptor and is implicated in microglial migration in the central nervous system. Microglial cells change form from a "resting" surveillant branched form to an "active" ameboid form where they are very active in rewiring of the brain by cleaning cellular debris and apoptotic cells. Understanding of these systems, which modulate complex physiology and cellular behavior, will extend our medical knowledge of how the endocannabinoid system and how this system can be harnessed for potential medical treatments.

Other cannabinoid studies of interest exist on the West Coast. Dr. Sean McAllister at the California Pacific Medical Center Research Institute is studying cannabinoids on differing types of cancer. Dr. Sean McAllister studies the non-toxic and non-psychoactive cannabinoid cannabidiol (CBD) and its effects on inhibition of human breast cancer cell proliferation and invasion. The mechanism involves down-regulation of Id-1 expression, which is implicated in aggressive metastatic cancers of the breast and brain. Greenbelt will collaborate in establishing an endowment fund to support academic and preclinical research on the studies such as these pertaining to further enrichment of cannabinoid-based medications.

Endowment Committee.

Greenbelt will have an endowment committee that will be selected by the executive management team and scientific advisers. This committee will be charged with distribution of the endowment funds through a competitive grant application process or collaborative scientific research projects, including but not limited to phytocannabinoids and the endocannabinoid system. Denver Relief Consulting has committed to assist in developing the fund and sourcing additional medical marijuana business participants.

In-House Plant Science and Product Research.

Using natural variation in the Cannabis genome we can shunt the metabolic pathways of cannabinoid, terpene, and trichome production to increase the flux toward important medicinal compounds inside the plant through our breeding methods. We can then produce extracts of specific cannabinoids for direct concentrated administration at levels recommended by physicians. Working in concert with physicians we can begin to determine dosing structures aimed at specific conditions. This method will greatly increase our knowledge of cannabinoids and their effectiveness through double blind studies. Additionally, we will work in concert with physicians to determine which products provide the most effective palliative relief to our patients in an effort to improve cannabinoid-based medicines. A major research goal of ours is to develop more precise extraction methods and drug delivery systems for cannabinoids to combat these specific ailments. We are taking the approach of a biotech aimed at phytocannabinoid-based medications.

Our specific approach is to develop molecular markers that will assist us in breeding cannabis with specific cannabinoid/terpene and trichome profiles. We have a long-term plan to develop quantitative trait loci and build a more robust reference genome of Cannabis sativa. The genome and transcriptome were published in 2011 (Van Bakel et al., 2011). Being a research-based company we strive to contribute new insights into the understanding of cannabinoid-based medications. We promote rigorous research and development of cannabinoid testing to be effective in providing patients with debilitating conditions a better quality of life.

After receiving advisement and council from top cannabinoid professionals in the field, Greenbelt has determined to advance to Regulated Clinical Trials (RCTs) with patients. However, a regulated product and delivery system is needed. On our path to attaining this goal we plan to promote observational, open label studies, which will provide a plethora of important dosing, safety and outcomes data.

Conclusion.

Our research plan draws on the advancement of the sciences of cannabinoid-based medication from both a plant and a human physiological perspective. We seek to establish an in-house research team for plant sciences as well collaborations with the Frank H. Netter MD School of Medicine at Quinnipiac Medical School. The medical school has named St. Vincent's Medical Center of Bridgeport as its primary clinical partner. It also has affiliations with Mid-State Medical Center of Meriden and Middlesex Hospital of Middletown where Greenbelt plans to be located.

## Citations

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Izzo, Angelo A., Francesca Borrelli, Raffaele Capasso, Vincenzo Di Marzo, and Raphael Mechoulam. "Non-psychoactive Plant Cannabinoids: New Therapeutic Opportunities from an Ancient Herb." *Trends in Pharmacological Sciences* 30, no. 10 (October 2009): 515–527. doi:10.1016/j.tips.2009.07.006.

4. Community Benefits Plan: 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.

Medical marijuana producers have an obligation not only to the health and well-being of the patients that use their programs, but to their communities as well. Jason and Matthew Nickerson have a well-established history of community giving in Connecticut. Greenbelt Management intends to continue that history of giving and community outreach in its operations. We have outlined a strategic plan that we believe will provide benefit to Middletown and Middlesex County. We intend to contribute five percent of net income to three or four organizations with a focus on Middlesex County whenever possible. Recipient organizations will be evaluated regularly to determine their efficient use of donated funds.

The Greenbelt Management Charitable Giving Program focuses on three primary areas: community agriculture, family services, and health.

**Community Agriculture:** The focus in this area is on programs that promote community farming programs providing locally sourced food to the region. Emphasis will be placed on programs that reach beyond community gardening and provide education and other types of development programs.

**Family and Children's Services:** Emphasis is placed on programs that provides families with educational activities targeted toward youths in the kindergarten to twelfth grade age range. Attention is given to the development of math, science, technology and business skills. Other priorities include college scholarship programs, family counseling programs, and assistance with basic family needs.

**Health:** Consideration is given to health organizations that strive to improve the health and well-being of individuals within the community. Programs focused on the holistic care needed by those with illness are preferred recipients.

We have preliminarily established the following guidelines for recipient organizations:

- An organization must have 501(c)(3) status.
- Support is provided for specific programs rather than for general funding.
- Support is not provided to religious organizations or political associations.
- Support is not provided to individuals or to capital or endowment campaigns.
- Support is provided primarily in Middlesex County and Connecticut.

Greenbelt Management has identified the following organizations as possible community partners:

- Connecticut Community Gardening Association
- Middletown United Fathers' Reverend Douglas E. Lawrence Community Garden
- Saint Vincent DePaul Place Amazing Grace Food Pantry
- Dances with Wood (Children's Cancer Group)
- Youth & Family Services of Haddam- Killingworth Inc.



5. Substance Abuse Prevention Plan: 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.

### **Substance Abuse and Overuse Prevention**

As Connecticut natives, we are very concerned with the growing abuse of prescription pharmaceuticals in the state and are proponents of medical marijuana as a safe and effective alternative. We realize the risk of long-term health problems and deaths related to dependence on pharmaceutical drugs, and for this reason are pursuing our producer's license to provide safe and effective substitutes to reduce patient dependence on narcotics and opiates. Greenbelt Management will benefit from the advice of a Substance Abuse Advisor, Erin Mulrane. Erin is a licensed drug addiction counselor with experience as a clinician and therapist. Ms. Mulrane will be essential in advising Greenbelt Management on the patient population and their needs for safe, non-habit forming use of our products.

As our first step toward preventing the misuse of our products, Greenbelt Management will manufacture a vaporizer pen that allows patients to alter both their dosage level and volume of inhalations using a management software that connects directly to the vaporizer. This user-friendly software enables patients to obtain a desired level of symptom relief while reducing the risk of overuse. The contents of the vaporizer pen will be an oil extraction tested in a licensed facility for exact dosing information. Additionally, the vaporizer pen releases the medicinal compounds of marijuana into a carcinogen-free vapor, eliminating the health risks of smoking. We will establish an extensive dispensary training program to educate them on the proper use of the vaporizer. Greenbelt Management will continue to pursue product development to reduce substance abuse in Connecticut and the overuse of medical marijuana.

## Greenbelt Management – Environmental Plan

6. Environmental Plan: 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.

Greenbelt Management is dedicated to minimizing the carbon footprint and environmental impact of our facilities by conserving resources and using sustainable practices whenever available. The owner's extensive construction experience allows Greenbelt Management to construct the most efficient space possible and to minimize construction waste. Additionally, our landlord, the City of Middletown, is providing new solar energy capacity to our facility which will provide an immediate impact on our energy use. To further minimize emissions of carbon dioxide due to the consumption of fossil fuels, Greenbelt Management will implement specific measures to reduce energy consumption and increase production efficiency.

### Minimizing Carbon Footprint.

Energy-efficient equipment and appliances can reduce energy consumption and reduce operation costs significantly, especially over time. While lighting is the most energy-intensive input for production centers, there are options to reduce energy consumption for indoor cultivation. Greenbelt Management will use the following energy-efficient equipment and appliances to maximize efficiency and minimize energy consumption:

**Electronic Ballasts:** we plan to use digitally-controlled electronic ballasts for all lighting sources requiring a ballast. Electronic ballasts reduce electricity usage, reduce heat, reduce air-conditioning and increase light output.

**LED Light -Bulbs:** Greenbelt Management plans to use LED bulbs as the primary source of lighting for two of the three developmental stages of cultivating medical marijuana. LED light bulbs use only 6-9 Watts, and can reduce electricity use up to 70% compared to the traditional high-pressure sodium or metal-halide light -bulbs. The low voltage also reduces the risk of accidental fires or electric shocks if exposed to moisture. LED light bulbs do not experience degradation and rarely need replacing. LED lights are easy and safe to replace because they do not contain vapors, mercury or glass.

**Reflective Material:** We plan to use and reuse reflective materials inside the cultivation center as a tool to maximize light distribution and subsequently reduce the need for additional lighting. Reflective materials will allow us to slightly reduce energy consumption that would otherwise be necessary to cultivate quality medical marijuana.

Locally Sourced Supplies: Greenbelt Management plans to acquire supplies from local retailers whenever possible. This practice reduces the impact of transportation on the environment.

Minimizing Environmental Impact.

Greenbelt Management plans to minimize environmental impact by using selective materials and encouraging sustainable practices throughout operations. As sustainable options become more available and economical we will continue to adopt sustainable practices to minimize environmental impact. In the interim, Greenbelt Management plans to adopt the following practices for minimizing environmental impact:

Material Selection: We plan to exclusively use biodegradable and recyclable packaging for all storage, handling, and packaging needs.

Recycling: Greenbelt Management will provide recycling bins throughout the facility for assorted plastics, glass, aluminum, and paper products.

Composting: We can minimize waste produced from the cultivation of medical marijuana through utilizing composting services to collect used organic material and create new, nutrient-rich, fertile, soil through composting. Greenbelt Management plans to use soil and soilless organic materials as the primary cultivation medium and will coordinate with local community gardens and compost collectors in the area to collect used soil that would otherwise be placed in a land-fill.

Minimizing Production Resources.

Re-using Supplies: We plan to reuse materials for all available cultivation supplies, such as vessels used for containing plants, nutrients, soil and water. Greenbelt Management will also reuse tools for cultivation, such as plant-reinforcement posts, watering and spraying devices, reflective material. These supplies will be reused after a sterilization process and will significantly reduce resource needs.

Electronic Communications: We plan to use email services as the primary channel of communication between management, employees, patients, caregivers, and vendors. Using paperless means of communication will reduce the paper resource needs of Greenbelt Management and reduce paper-waste.

 Greenbelt Management – Team Qualifications

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## JILL LAMOUREUX

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JILL LAMOUREUX is a former cannabis dispensary operator and the lead application consultant for Denver Relief Consulting. In addition to establishing one of Colorado's most respected multi-location dispensary operations, Jill has earned national recognition for her expertise in best practice and operating standards. Jill works with clients navigating complex licensing and application processes throughout the United States and in Canada.

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### **SPECIALTY KNOWLEDGE**

From 2008 to 2012, Jill operated four dispensaries, three cultivation facilities, and one commercial kitchen in Colorado. In 2010, she applied for and obtained state and local licenses in Colorado's first effort to convert unregulated businesses. Jill and her staff completed three mergers and asset purchase agreements, compiled thousands of documents and site plans relating to seven different locations, assembled hundreds of personal documents for more than a dozen business owners, and obtained approval from four municipalities over the course of two months. Each of the company's owners and location were granted licenses, giving her a thorough understanding and deep appreciation for the challenges that come with managing complex application processes.

The only business owner to serve on both the Colorado Department of Public Health and Environment and the Medical Marijuana Enforcement divisions' medical marijuana work groups, Jill played an active role in development of Colorado's first round of industry, physician, patient, and caregiver regulations. Jill provided regulatory advisory and drafting services to all three of Colorado's marijuana business trade associations at the end of 2012. Many of Jill's proposed rules have been adopted and are currently in effect.

Jill recently assisted the Washington State Liquor Control Board in developing their licensing process, joining RAND researchers and fellows as a member of the BOTEK Analysis Corporation team. She developed the medical marijuana business third-party audit and certification program (based on NSF, ISO, and USDA certification programs) for Americans for Safe Access, a national non-profit patient advocacy and scientific research group. Jill is also a key member of the work group developing recommendations for marijuana regulators of the American Herbal Products Association, and regularly develops operating standards for clients in multiple jurisdictions including Canada, Colorado, Massachusetts, Connecticut, and the District of Columbia. Jill has begun developing application strategies for Nevada and Illinois.

## **BACKGROUND**

With a background in municipal revenue bond management and special district administration, Jill provides specialized knowledge necessary for developing policies and procedures in highly regulated environments. Her experience as a start-up dispensary operator in a newly regulated and over-saturated market has given Jill a deep understanding of the common and uncommon challenges faced by new and established cannabis industry operators alike. A diverse range of political and business experiences informs Jill's proposals for sensible and effective regulatory measures, as she continues to work with state policymakers and national industry clients for the ongoing development of a compliant legal cannabis industry.

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## KAYVAN KHALATBARI

KAYVAN KHALATBARI is the co-founder and Operations Manager of Denver Relief, the second longest-operating dispensary in all of Colorado. He is a vocal advocate for the legalization movement and a passionate spokesman for the evolution of a normalized cannabis industry. As a founding partner of Denver Relief Consulting, Kayvan offers comprehensive guidance for the development and management of national and international cannabis operations. He is a lead consultant for clients throughout the United States and Canada, and serves as an advisory board member for the first dispensary awarded a license in Vermont.

Kayvan has appeared on national television and public stages, at business seminars and cannabis competitions. He is an avid philanthropist, outspoken activist, and an inventive entrepreneur with a professional edge that encourages change in the public perception of marijuana.

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### SPECIALTY KNOWLEDGE

As a lead consultant in Colorado, Massachusetts, Washington, D.C., and Canada, Kayvan has first-hand experience navigating a range of complex applications and licensing procedures. He specializes in the development of cultivation and retail facility designs, operating policies and procedures, employee training plans and community outreach programs. Kayvan provides clients with knowledge necessary for ensuring the future viability and legal protection of all cannabis operations, along with guidance for ongoing regulatory navigation, business accounting and post-license management. He organizes referral arrangements with a network of ancillary companies and is currently working on the development of an inventory management system with a company in the United Kingdom.

Balancing business savvy with a passion for community service, Kayvan helped establish the service-centric Green Team in 2009, a volunteer-based community outreach organization that regularly coordinates urban gardening efforts, free bicycle and wheelchair repair clinics, food and clothing collection drives, and trash pickup efforts at public events. The Green Team is currently raising money to send an underprivileged student to college while in the process of converting to a 501(c)(3) to expand their service network nationwide.

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### BACKGROUND

Raised in Lincoln, Nebraska, Kayvan moved to Denver in 2004 with a degree in Architectural Engineering and spent five years working as an electrical systems designer. In an effort to make friends and get involved with his new community,

Kayvan started volunteering with Sensible Colorado and SAFER, non-profit organizations dedicated to drug policy reform and public education.

In 2007, Kayvan partnered with the Assistant Director of SAFER to start Sexy Pizza and continued to support medical marijuana activism through the pizzeria. Sexy Pizza honors non-profit organizations including SAFER, Sensible Colorado, SSDP and LEAP with a pie on the menu that delivers proceeds to them each time it is purchased.

Kayvan is a founding board member of the Medical Marijuana Assistance Program of America, the nation's first alternative treatment preferred provider organization of its kind. He became a board member of the Colorado Youth Symphony Orchestra in 2012, and has volunteered as a "big brother" mentor for Denver Kids Inc. since 2007.

Kayvan's background experience in architectural trades allows him to apply first-hand knowledge of effective building design, construction, and power distribution systems while developing cultivation facility plans for clients. Strong activist roots keep Kayvan connected with a powerful network of policy-reform experts who've achieved landmark success in Colorado with the recent legalization of recreational cannabis use. With progressive cultivation knowledge and socially conscious business practices, Kayvan runs an industry-leading operation known for establishing best practices. He is a multi-faceted mentor offering highly sought expertise for current and prospective cannabis industry professionals.



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## NICK HICE

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NICK HICE is a master cultivator known for managing one of the most successful commercial cannabis operations in Colorado. As a founding partner of Denver Relief Consulting, Nick brings over 15 years of experience with indoor growing under high intensity lighting to national and international clients. His innovative plant care techniques and dynamic approach to cultivation team management have led to the development of highly regarded operations that exemplify industry best practices and maximum efficiency in legal cannabis cultivation.

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### **SPECIALTY KNOWLEDGE**

As the Cultivation Facility Operations Manager for Denver Relief, Nick understands that the greenhouse is the lifeblood of a commercial cannabis operation. His ability to consistently yield quality medical marijuana is a highly sought-after skill. This paired with his ability to communicate with clients makes Nick a trusted advisor at all stages of cultivation facility development, from floor plans to first harvest.

Nick specializes in stabilizing controlled growing environments, minimizing pests and pathogen harms, and implementing nutrient monitoring systems. He has first-hand experience building high-tech greenhouses, and constantly pursues knowledge of new cultivation techniques for high yield cannabis crops.

Nick manages teams of as many as 25 employees at a time, ensuring best practices while maximizing crop production. He regularly conducts LED and plasma light testing as more efficient technology is developed to meet the growing energy demands of large-scale cannabis cultivation operations.

With a strong commitment to professionalizing public perception of cannabis growers, Nick actively scouts expert cultivators for clients looking to employ premium talent. Nick is also an active member of the Green Team, a national network of volunteers dedicated to integrating philanthropy into business practices throughout the retail cannabis industry.

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### **BACKGROUND**

Raised by horticultural entrepreneurs in his hometown of Dayton, Ohio, Nick started working in the commercial agriculture industry long before entering high school. Nick spent much of his adolescence tending to an array of unique plant species sold at the family nursery, a crucial responsibility that helped foster a life-long passion for plant husbandry. After obtaining a Communication Management degree from the University of Dayton, Nick gained experience with effective business management during a decade spent helping run the family-owned

landscape design company, nursery and garden center. He also designed and built commercial and residential irrigation systems during times of drought, adding vital knowledge of waterworks to his arsenal of cultivation skills.

Through his involvement with green industry associations, including the Ohio Nursery and Landscape Association (ONLA) and Professional Landcare Network (PLANET), Nick became an Ohio Certified Nursery Technician (OCNT) and served as a certification committee member from 2007-2009. He helped write OCNT textbooks and testing materials for professional garden center, grower, and landscape certifications.

Adding to his list of achievements, Nick's OG-18 strain won "Best Hybrid" at the first ever U.S. Cannabis Cup in 2013.

# CIRRICULUM VITAE

Dennis Bernard DePaolo



## Current Address:



E-mail: [ddepaolo@cns.umass.edu](mailto:ddepaolo@cns.umass.edu)

## Education:

SUNY Cortland 2009  
B.S. Biology  
GPA 3.3  
Honors

UMASS Amherst  
PhD. Plant Biology 2015  
GPA 3.7

## Academic Activities

Tri-Beta National Honor Society @ SUNY Cortland	President 2009
Teachers Assistant: Bio-100 Lab Instructor	UMASS Amherst 2010-2011
General Genetics and Molecular Biology	2012
Gene and Genome Analysis	2013
Bio-151 Biology Discussion Section	2013

## Academic Research Societies

American Society of Plant Biologists (ASPB)	Member 2012-2013
International Cannabinoid Research Society (ICRS)	Member 2011-2013

## Recent Awards, Grants, Fellowships

UMASS Amherst USDA/NSF Grant Supervisor	Elsbeth Walker 2010-present
UMASS Amherst Travel Grant 2012 – International Symposium on Iron Nutrition and Interactions in Plants	2012
SUNY Cortland Research Travel Grant -- ASPB -- Plattsburgh	2009
SUNY Cortland Summer Research Fellowship Recipient	2008
Boyce Thompson Institute @ Cornell (REU) Plant Genome Research Project	2008

## Research Completed

Identification of <i>yellow stiripe3</i> ( <i>ys3</i> ) in <i>Zea Mays</i> via Map Based Cloning	Fall 2013
University of Massachusetts Amherst. Dr. E. Walker	

Characterization, Genetic Complementation, and Ascorbic Acid Levels of *vitamin C3 (vtc3)* in *Arabidopsis thaliana*. State University of New York College at Cortland. Dr. P. Conklin Spring 2009

Phylogenetic Sequencing of Mushroom Species State University of New York College at Cortland. Dr. T. Baroni Fall 2008

Glucosinolate Production in Response to Aphid Feeding Using *Arabidopsis thaliana* as a Model Species. Boyce Thompson Institute of Plant Research, Cornell University Dr. G. Jander Fall 2008

Identification of VTC3 in *Arabidopsis thaliana* via Map Based Cloning Boyce Thompson Institute of Plant Research, Cornell University Dr. P. Conklin; Dr. G. Jander Summer 2008

Synthesis and Characterization of Pt<sub>2</sub>Cl(X)<sub>2</sub> Anti-tumor Complexes Including their Interactions with *E. coli*. State University of New York College at Cortland. Dr. A. Zipp Summer 2007

### **Academic Presentations:**

*Poster Presentation, D. DePaolo, M. Klein, E Walker*  
“Mutation in ZmTOM1 Leads to Iron Deficiency in Maize *yellow stripe3 (ys3)* Mutant”  
UMASS Amherst Plant Biology  
Spring Symposium October 2013

*Poster Presentation, D. DePaolo, B. Yordem, K. Vasques, S. Conte*  
“Promoter:GUS Analysis of “*yellow stripe like*” Gene Family in *Zea mays*”  
International Symposium on Iron Nutrition and Interactions in Plants,  
UMASS Amherst, MA June 2012.

*Oral Presentation, D. DePaolo*  
“The Hunt for *ys3*” UMASS Amherst  
UMASS Amherst Seminar Series January 2011

*Poster Presentation, D. DePaolo, C. Shatz, P. Conklin*  
“How VTC3 May be Involved in Ascorbic Acid Biosynthesis”  
72<sup>nd</sup> Annual Meeting of the  
Northeast Section of the American Society of Plant Biologists,  
Plattsburgh, NY May 2009.

*Oral Presentation, D. DePaolo, C. Shatz, P. Conklin*  
“VTC3 and Its Roll in Regulating Ascorbic Acid Pools in Plants”

State University of New York at Cortland. Scholars Day. April 2009.

*Oral Presentation, D. DePaolo*

“Identification and Characterization of VTC3 in *Arabidopsis thaliana* via Map Based Cloning and Traditional Sequencing.”

Boyce Thompson Institute of Plant Research, Summer Symposium. August 2008.

*Poster Presentation. D. Depaolo*

“Synthesis and Characterization of PtCl<sub>2</sub>(X-pyridine)<sub>2</sub> Complexes and Their Interactions with *E.coli*.”

State University of New York at Cortland. Scholars Day 2008.

**Publications:**

P. L. Conklin, **D. DePaolo**, B. Wintle, C. Schatz, G. Buckenmeyer, “Identification of Arabidopsis VTC3 as a putative and unique dual function protein kinase::protein phosphatase involved in the regulation of the ascorbic acid pool in plants.” *Journal of Experimental Botany*, 2013 , 64, 10, 2793 -2804. doi: 10.1093/jxb/ert140

## Erin P. Mulrane, LADC, CAC, MA, MATS

### Education

NEW YORK UNIVERSITY

- Master of Arts in Psychology [Fall 2007]

SKIDMORE COLLEGE

- Bachelor of Arts in Psychology, minor in Management and Business [Spring 2005]

### Experience in the Field of Behavioral Health

CONNECTICUT RENAISSANCE

10/2010-present

*Intensive Outpatient Clinician*

Norwalk, CT

- Responsible for syllabi and facilitation of two Intensive Outpatient (IOP) treatment tracks, each meeting for nine hours per week.
- Meet individually with caseload of 12-20 clients, per each IOP track, on a periodic basis to monitor that they are working successfully towards their treatment plan goals.
- Collaborate with clients' attorneys, probation officers and legal referrals on a daily basis to ensure that clients in program comply with legal stipulations.

SELF-EMPLOYED

9/2010-present

*Therapist*

Newtown, CT

- Offer talk therapy to individuals with a variety of problems including but not limited to anxiety, depression and addiction issues.
- Plan for continuity of care for clients by consulting with available services in the area.

REGIONAL NETWORK OF PROGRAMS

5/2009-10/2010

*Senior Counselor/Intern Supervisor*

Stratford, CT

- Consult opiate dependent clients in adjusting methadone/Suboxone (buprenorphine) dose to alleviate withdrawal symptoms and cravings for opiates.
- Responsible for facilitating and creating syllabi for three groups per week, including dual diagnosis and art therapy groups.
- Involve families in treatment by conducting family sessions to educate families and clients on the theories of recovery, addiction and medication assisted therapy.

LIBERATION PROGRAMS, INC.

10/2007-5/2009

*Outpatient Counselor/HIV Prevention Counselor*

Stamford, CT

- Provided individualized treatment and discharge planning for caseload ranging from 45-65 clients, including clients receiving medication for treatment of opiate dependence.
- Regularly conducted HIV rapid testing along with pre and post counseling/risk assessment

WOMEN'S CENTER OF GREATER DANBURY

09/2006-2/2008

*Domestic Violence/Sexual Assault Crisis Hotline Volunteer*

Danbury, CT

- Validated feelings of fear, panic, depression and confusion, then safety plan for possible violent situations.

### Licensures/Certifications/Affiliations

- Licensed Alcohol and Drug Counselor. State of CT License # 000905. 02/2010-present
- Specialty Certificate in Problem Gambling. Connecticut Cert Board. 06/2013 - present
- Certified Addiction Counselor. Connecticut Certification Board. 02/2010-present
- HIV Prevention Counseling Certificate. Department of Public Health. 01/2010-present
- Medication Assisted Therapy Specialist. Connecticut Certification Board. 11/2009-present
- CPR/First Aid Certification from Red Cross. 08/2010-present

## Curriculum Vitae

Date Prepared: 10-15-2013

Name: James C. Wittig, M.D.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Website: [www.TumorSurgery.org](http://www.TumorSurgery.org)

### **Academic Appointments and Other Positions:**

- 1994 President of Alpha Omega Alpha (AOA) Medical School Honor Society, Delta Chapter, NYU School of Medicine, Class of 1994
- 1998-1999 Administrative Chief Resident, Dept. of Orthopaedic Surgery, Columbia Presbyterian Medical Center
- 2001-09/2007 Assistant Professor of Orthopaedic Surgery, New York University School of Medicine
- 2001- Associate Attending, Department of Orthopaedic Surgery, St. Joseph's Hospital and Medical Center, Paterson, NJ
- 2004- Director, Skin and Sarcoma Section of the Cancer Center, Hackensack University Medical Center
- 2004- Clinical Chief, Orthopedic Oncology, Hackensack University Medical Center
- 2006-09/2007 Director, Sarcoma Section, NYU Cancer Institute
- 2007- Chief, Orthopaedic Oncology, Mount Sinai Medical Center

### **Hospital Appointments:**

- 2001-09/2007 Assistant Professor of Orthopaedic Surgery, New York University Medical Center, Tisch Hospital, New York, NY
- 2001-09/2007 Assistant Professor of Orthopaedic Surgery, Hospital for Joint Diseases, New York, NY
- 2001-09/2007 Assistant Professor of Clinical Orthopaedic Surgery, Bellevue Hospital Center, New York, NY
- 2001-09/2007 Assistant Professor of Orthopaedic Surgery, Manhattan Veterans' Administration Hospital, New York, NY
- 2001- Associate Attending, Department of Orthopaedic Surgery, St. Joseph's Hospital and Medical Center, Paterson, NJ

2003-	Attending, Orthopaedic Surgery, The Valley Hospital, Ridgewood, NJ
2004-	Attending, Orthopedic Surgery, Hackensack University Medical Center, Hackensack, NJ
11/2007-	Associate Professor of Orthopaedic Surgery, Mount Sinai Medical Center
10/2008-	Attending, Orthopaedic Surgery, Morristown Memorial Hospital, Morristown, NJ
05/2009-	Attending, Orthopaedic Surgery, Overlook Hospital, Summit, NJ

**Education:**

1990 B.S.	Seton Hall University, Summa cum Laude
1994 M.D.	New York University School of Medicine

**Postdoctoral Training:**

*Internship and Residency:*

1994-1995	Intern in General Surgery, St. Luke's-Roosevelt Hospital Center, New York, NY
1995-1999	Resident in Orthopaedic Surgery, Columbia Presbyterian Medical Center, New York, New York

*Clinical Fellowship:*

1999-2001	Fellow in Orthopaedic Oncology, Washington Cancer Institute, Washington Hospital Center, Children's National Medical Center, Armed Forces Institute of Pathology, Washington, D.C.
1999-2001	Sarcoma Consultant, Surgical Branch, National Cancer Institute, National Institutes of Health, Bethesda, MD

**Certification:**

2003	Board Certified, American Board of Orthopaedic Surgery (07/03)
2013	Board Certified, American Board of Orthopaedic Surgery (02/13)

**Licensure:**

1992	USMLE Step I: 91 <sup>st</sup> Percentile
1994	USMLE Step II: 98 <sup>th</sup> Percentile



1995 USMLE Step III: 83<sup>rd</sup> Percentile  
 1995 Medical Licensure, New York--Active  
 1997 Medical Licensure, New Jersey--Active  
 1998 Medical Licensure, District of Columbia--Expired  
 1998 Medical Licensure, Maryland--Expired  
 1998 Medical Licensure, Virginia--Expired  
 1998 Basic Microsurgery Course, Columbia Presbyterian Medical Ctr

**Awards and Honors:**

1990 Biology Department Honors Citation for Superior Academic Achievement, Seton Hall University  
 1990 Summa cum Laude, Seton Hall University  
 1993 Alpha Omega Alpha (AOA)  
 1994 Most Outstanding Research Presentation on Medical Student Assembly Day, NYU School of Medicine  
 1994 The Lange Medical Publication Award for Outstanding Achievement as a Medical Student, NYU School of Medicine  
 1994 Glover C. Arnold Surgical Award for the Medical Student who Excelled in Surgery, NYU School of Medicine  
 1999 The Orren D. Baab Award for Excellence in Orthopaedic Surgery, Member of the Senior Resident Staff who Best Exemplifies those Qualities of Academic Excellence, Clinical Proficiency and Capacity for Leadership, New York Orthopaedic Hospital  
 2007 Teacher of the Year Award for Outstanding Leadership, Guidance and Selfless Dedication to the Residents of the NYU Hospital for Joint Diseases Department of Orthopaedic Surgery, Class of 2007 (out of 120 orthopaedic surgeons)  
 2009 Top Doctors: New York Metro Area, 12<sup>th</sup> Edition, Castle Connolly  
 2009 New York Magazine: Top Doctors Orthopedic Surgery  
 2010 Top Doctors: New York Metro Area Magazine, 13<sup>th</sup> Edition. January, Castle Connolly  
 2010 Top Doctors in America: The Best Orthopedic Surgeons in America. 9<sup>th</sup> Edition, Castle Connolly  
 2010 New York Super Doctor New York Time Magazine May 12<sup>th</sup>  
 2010 New York Magazine: Top Doctors Orthopedic Surgery  
 2010 Top Doctors in America for Cancer 6<sup>th</sup> Edition, Castle Connolly  
 2011 New York Magazine: Top Doctors Orthopedic Surgery  
 2011 Top Doctors in America: The Best Orthopedic Surgeons in America. 10<sup>th</sup> Edition, Castle Connolly  
 2011 Top Doctors: New York Metro Area 14<sup>th</sup> Edition, Castle Connolly  
 2011 Top Doctors in America for Cancer 7<sup>th</sup> Edition, Castle Connolly  
 2012 Top Doctors: New York Metro Area 15<sup>th</sup> Edition, Castle Connolly  
 2012 Top Doctors in America for Cancer 8<sup>th</sup> Edition, Castle Connolly  
 2012 Top Doctors in America: The Best Orthopedic Surgeons in

- 2012 America. 11th Edition, Castle Connolly  
 2012 Top Doctors in America: The Best Orthopedic Surgeons in America. 12th Edition, Castle Connolly  
 2012 New York Magazine: Top Doctors Orthopedic Surgery  
 2013 New York Magazine: Top Doctor's Orthopedic Surgery  
 2013 Top Doctors: New York Metro Area 16<sup>th</sup> Edition, Castle Connolly  
 2013 Top 13 Orthopedic Oncologist in US: According to *Orthopedics This Week*

**Administrative Leadership Appointments:**

- 2001-09/2007 Director, Orthopedic Oncology Service, Bellevue Hospital  
 Established and Developed Orthopedic Oncology Service  
 Patient Volume: 650 Outpatients Visits and 60 Surgeries per year  
 Supports Pediatric and Medical Oncology, Radiation Oncology, Musculoskeletal Radiology and Pathology
- 2001-09/2007 Course Director, Orthopedic Oncology Lecture Series  
 NYU-Hospital for Joint Diseases Orthopedic Surgery Residents  
 Organized Didactic Lecture Series and Delivered 15 Lectures  
 Instituted Interactive Didactic Lecture Series  
 Well Received by Residents  
 Improved Scores on In-training Examination  
 Instituted On-Line Lecture Series and Unknown Cases
- 2005- Director, Sarcoma Section, Cancer Center, Hackensack University Medical Center  
 Established Orthopedic Oncology/Sarcoma Service  
 Over 100 Surgeries per year  
 Established Multidisciplinary Conferences  
 Supports Pediatric and Medical Oncology, Radiation Oncology, Musculoskeletal Radiology and Pathology
- 2006-09/2007 Director, Sarcoma Section, NYU Cancer Institute  
 Initiated Sarcoma Tissue Bank  
 Pending IRB Approval  
 Initiated Multidisciplinary Sarcoma Conferences  
 Supports Pediatric and Medical Oncology, Radiation Oncology, Musculoskeletal Radiology and Pathology
- 11/2007- Chief, Orthopaedic Oncology, Mount Sinai Medical Center
- 06/2009- Director, Orthopedic Oncology Fellowship, Mount Sinai Medical Center

**Major Committee Assignments:**

2001-2002 New York University School of Medicine Faculty Council  
2002-2003 New York University School of Medicine Credentialing  
Committee

**Memberships, Offices and Committee Assignments in Professional Societies:**

2004- Member, American Academy of Orthopaedic Surgeons  
2010- Member, Musculoskeletal Tumor Society

**Teaching Activities:**

2001- Orthopedic Oncology Didactic Curriculum for St. Joseph's  
Hospital Orthopedic Surgery Resident  
2007- Orthopedic Oncology Didactic Curriculum for Mount Sinai  
Orthopedic Surgery Resident  
2007- Orthopaedic Pathology Course, Mount Sinai Medical Center  
Annual Course; Responsible for Organizing Course, Providing  
Didactic Lectures and Teaching Radiological, Pathological and  
Orthopedic Surgical Aspects of Orthopedic Tumors  
Course Attended by 60-80 Orthopedic Residents per Year

**Major Research Interests:**

1. Clinical Outcome Studies following Limb Sparing Surgery for Bone and Soft Tissue Sarcomas and other Benign Orthopaedic Tumors
2. Overexpression of Protooncogenes and Growth Factor Receptors by Osteosarcoma and other Bone and Soft Tissue Sarcomas
3. Induction Chemotherapy for High Grade Soft Tissue Sarcomas including Radiologic and Pathologic Changes
4. Cryosurgery
5. Epineural Analgesia for Postoperative Pain Control
6. Gene and Protein Expression in Sarcomas and Other Mesenchymal Tumors

**Teaching Experience:**

1998-1999 Administrative Chief Resident, Columbia Presbyterian Medical  
Center  
Organized Lecture Series for Orthopaedic Residents  
Organized Grand Rounds for Orthopaedic Surgery Department

Lectures in Orthopaedic Pathology and Orthopaedic Oncology  
Supervise Junior Residents during Surgical Procedures and during  
Closed Reductions of Fractures  
Instructor in Orthopaedic Surgery for Third Year Medical Student  
Clinical Clerkships

1999-2001 Fellow, Orthopaedic Oncology, Washington Cancer Institute  
Organized Weekly Orthopaedic Oncology Conference for  
Orthopaedic Residents and Medical Students  
Organized and Delivered Biweekly Multidisciplinary Sarcoma  
Conferences  
Supervise Orthopaedic Residents during Surgical Procedures

2001-2007 Assistant Professor of Orthopaedic Surgery, New York University  
School of Medicine  
Organize and Deliver Orthopaedic Oncology Didactic Curriculum  
for Orthopaedic Surgery Residents (20 Lectures per Year)  
Organize and Deliver Weekly Radiology and Pathology Lectures  
for Residents at Bellevue Hospital  
Organize and Deliver Monthly Multidisciplinary Sarcoma  
Conferences  
Teach Residents and Medical Students Orthopaedic Oncological  
Surgery  
Teach Medical Students Physical Diagnosis of the Musculoskeletal  
System

2007 Rotation in Orthopaedic Oncology for Foreign Visiting  
Orthopaedic Surgery Resident: Rodolfo Zamora, MD  
February 1, 2007 to April 30, 2007  
Hospital Clinico Universidad de Chile  
Santos Dumontt 999, Independencia, Santiago, Chile  
Orthopaedic Department Phone: 56 2 978 8225  
Web Site: [www.redclinica.cl](http://www.redclinica.cl)

2007-2008 Rotation in Orthopaedic Oncology for Foreign Visiting  
Orthopaedic Surgery Resident: Claudio Vasquez, MD  
December 1, 2007 to March 1, 2008  
University Hospital Torrecardenas  
Almeria, Spain

**Grand Rounds:**

03/2009 Grand Rounds, Limb Sparing Surgery for Pediatric Sarcomas at  
Hackensack University Medical Center, NJ. Lecture attended by  
50 physicians  
06/2009 Grand Rounds, Limb Sparing Surgery for Sarcomas at

Winthrop-University Hospital. Lecture attended by 50 Orthopedics surgeons and orthopedic residents.  
03/2010 Grand Rounds, Limb Sparing Surgery for Sarcomas at Pro Health, Long Island, NY. Attended by 50-60 Orthopedic Surgeons.

**IRB Approved Research Studies:**

- 2007 Establish tissue bank for bone and soft tissue tumors: sarcomas and benign mesenchymal/musculoskeletal tumors  
Establishment of sarcoma stem cell lines  
Molecular and genetic studies to identify clinicopathologic and molecular prognostic markers to determine treatment outcomes  
Identify new targets for sarcoma treatment  
Evaluate the biologic heterogeneity of sarcomas with respect to abnormalities in growth factors, oncogenes, tumor suppressor genes, markers of drug resistance, and other molecular defects that may be associated with disease progression  
Evaluate changes in these parameters in patients treated with systemic chemotherapy, radiation therapy, targeted therapy (biological approaches)  
Evaluate molecular differences between benign, benign aggressive and malignant mesenchymal tumors and between low and high grade sarcomas  
Evaluate molecular differences between primary sarcomas and their metastases  
Principal investigators: James C. Wittig, MD, Eva Hernando, PhD, Roberto Garcia, MD  
Submitted for IRB approval NYU Medical Center
- 2010 Limb sparing resection for tumors involving the distal humerus and reconstruction with a modular distal endoprosthesis.  
Principal investigators: James C Wittig, MD,  
Co-investigator: Camilo Villalobos, MD, Rodolfo Zamora, MD.  
IRB Approved Mount Sinai Medical Center
- 2013 Pearls and pitfalls of the resection of adductor compartment soft tissue masses  
Principal investigator: James C Wittig, MD  
Co-investigator: Rodolfo Zamora, MD, Camilo Villalobos, MD.  
IRB Approved Mount Sinai Medical Center
- 2013 Is the radiotherapy necessary after the surgical stabilization for pathologic fractures and impending fractures in multiple myeloma?

Principal investigators: James C Wittig, MD  
Co-investigator: Rodolfo Zamora, MD, Camilo Villalobos, MD  
Submitted for IRB approval Mount Sinai Medical Center

2013 Bipolar long stem cemented hemiarthroplasty for proximal femur metastases. Review of 43 cases.  
Principal investigators: James C Wittig, MD  
Co-investigator: Rodolfo Zamora, MD, Camilo Villalobos, MD  
Yehuda Fait  
Submitted for IRB approval Mount Sinai Medical Center

2013 Sarcoma database and biorepository study.  
Principal investigator: Robert G. Maki, MD, PhD  
Co-investigators: Angela Cioffi, MD, Linda Ahn, NP, Katrina Watson, Pamela Merola, MD, Birte Wistinghausen, MD, Ilya Iofin, MD, James Wittig, MD, Roberto Garcia, MD, Elizabeth G. Demicco, MD, Vishal Gupta, MD, Dan Labow, MD, Spiros Hiotis, MD, Sam Sidi, MD, Carlos Cardon-Cardo, MD, Andrew Kasarkis, PhD, John Martignetti, MD PhD, James Manfredi, PhD, Karen Brown, MD, Vanesha White.  
IRB approved Mount Sinai Medical Center

**Grants:**

1999 Institutional grant, Washington Hospital Center, Medstar Research Institute  
Principal Investigator  
Title: Her2/neu and EGFR (Epidermal Growth Factor Receptor) Expression in Osteosarcoma  
Total Costs: \$12,400.00

**Website:**

[www.TumorSurgery.org](http://www.TumorSurgery.org) or [www.BoneCancer.org](http://www.BoneCancer.org)  
Provide Educational Material for Patients and Residents about Bone and Soft Tissue Tumors and Sarcomas including Orthopaedic Oncology and Pathology Lectures, Case Studies, Videos, Unknown Cases, Important Papers and Publications  
Detailed Information and Presentations Describing Step by Step Surgical Procedures  
Orthopaedic Oncology Electronic Newsletter: "Orthopedic Oncology Today"  
Special Children's Corner Designed to Comfort and Educate Children Afflicted with these Diseases  
Support Groups and Patient Testimonials

Office and Administrative Information including Online Forms  
and Checklists for Initial Consultations, Biopsies and  
Radiofrequency Ablation  
Expectations as a New and Follow up Patient  
Special Section Dedicated to Radiofrequency Ablation of Osteoid  
Osteomas

### **National/International Meetings**

- 05/2007 Deshpande C, Wittig J, Patel D, Villalobos CE. Painful shoulder mass in 28 year-old female. Annual Seton Hall University Research Colloquium, NJ. Poster Presentation
- 05/2008 Chokshi N., Villalobos CE., Wittig JC. Hemangioendothelioma of Scapula. A case report. Annual Seton Hall University Research Colloquium. South Orange, NJ. Poster Presentation
- 05/2008 Chokshi N., Villalobos CE, Wittig JC. Hemangioendothelioma of Scapula A case report. Annual NJOS Meeting. Atlantic City, NJ. Poster Presentation
- 09/2009 Bronson W, Hayden BL, Villalobos CE , Malawer MM; Wittig JC Limb-sparing Resection of the Scapula for a Large Chondrosarcoma and Reconstruction of the Shoulder Girdle with a Constrained Total Scapula Prosthesis. *How I do it.* . The International Symposium of Limb Salvage and The Musculoskeletal Tumor Society, Boston, MA. Poster Presentation
- 10/2010 *Moderator:* Video-Based Education Section. Orthopedic Surgery Section. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC.
- 11/2010 *International Guest Speaker:* XLVI Chilean Congress of Orthopedics and Trauma. Coquimbo, Chile
- 12/2010 *Speaker:* Advances in Orthopaedic Trauma and Arthroplasty. December 13, 2010. Miami, Florida.
- 02/2011 *Speaker:* The Multimedia Education Center. 78<sup>th</sup> Annual Meeting American Academy of Orthopaedic Surgeons. February 15-19, 2011, San Diego, CA
- 02/2012 *Speaker:* The Multimedia Education Center. 79<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons. February 7-11, 2012, San Francisco, CA

- 02/2012 *Moderator and Presenter:* Reconstruction of the shoulder girdle. 79<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons. February 7-11, 2012, San Francisco, CA
- 03/2012 *Speaker:* 2<sup>nd</sup> Annual Advances in Orthopaedic Trauma and Arthroplasty. March 8-10, 2012. Miami, Florida.
- 09/2013 Zamora R, Villalobos C, Young L, Gold P, Wittig JC. Results After Surgical Stabilization in Pathologic and Impending Fractures in Multiple Myeloma, Without Postoperative Radiotherapy. 18th International Society of Limb Salvage 2013, Bologna, Italy
- 09/2013 Zamora R, Feit EJ, Villalobos C, Gold P, Wittig JC. Bipolar Long Stem Cemented Hemiarthroplasty for Proximal Femur Metastases. Review of 41 patients. 18th International Society of Limb Salvage, Bologna, Italy.

### **Bibliography:**

#### Textbooks:

1. Martin M. Malawer, James C Wittig, Jacob Bickels. Editor –in-Chief: Sam W. Wiesel. Operative Techniques in Orthopaedic Surgical Oncology. Lippincott Williams and Wilkins. ISBN 13: 9781451176285 ISBN 10: 1451176287 Philadelphia. February 2012

#### Original Reports:

2. Black VH, Wittig JC, Cheung P. Intraadrenal steroid metabolism in the guinea pig: guinea pig adrenal microsomes metabolize androstenedione in a manner distinct from liver microsomes. Endocrine Research 1995; 21(1&2): 315-328.
3. Wittig JC, Simpson B, Bickels J, Malawer M. Giant cell tumor of the hand: superior results with curettage, cryosurgery and cementation. J Hand Surg 2001; 26A(3):546-555.
4. Wittig JC, Bickels J, Kollender Y, Kellar-Graney KL, Meller I, Malawer M. Palliative forequarter amputation for metastatic carcinoma to the shoulder girdle region: indications, preoperative evaluation, surgical technique, and results. J Surgical Oncol 2001; 77:105-113.
5. Bickels J, Wittig JC, Kollender Y, Neff R, Kellar-Graney, Meller I, Malawer M. Reconstruction of the extensor mechanism after proximal tibia resection with endoprosthetic reconstruction. J Arthroplasty 2001; 16:856-862.



6. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. Utilitarian surgical approach for resection of malignant shoulder girdle tumors. *Orthopedics* 2002; 25; 479-484.
7. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. Constrained (rotator cuff- substituting) total scapula prosthesis following tumor resection: description of a new prosthesis and anatomic reconstruction. *Clin Orthop* 2002; 397:143-155.
8. Wittig JC, Bickels J, Kellar-Graney K, Malawer M. Osteosarcoma of the proximal humerus: long term results with limb sparing surgery. *Clin Orthop* 2002; 397:156-176.
9. Bickels J, Wittig JC, Kollender Y, Kellar-Graney K, Meller I, Malawer M. Limb-sparing resections of the shoulder girdle. *J Am Coll Surg* 2002; 194:422-435.
10. Bickels J, Wittig JC, Kollender Y, Henshaw RM, Kellar-Graney K, Meller I, Malawer M. Distal femur resection with endoprosthetic reconstruction: a long-term followup study. *Clin Orthop* 2002; 400: 225-235.
11. Bickels J, Wittig, JC, Kollender Y, Kellar-Graney K, Malawer M, Meller I. Sciatic nerve resection: is that truly an indication for amputation? *Clin Orthop* 2002; 399: 201-204.
12. Bickels J, Wittig JC, Kollender Y, Kellar-Graney K, Mansour KL, Meller I, Malawer M. Enchondromas of the hand: treatment with curettage and cemented internal fixation. *J Hand Surg* 2002; 27A:870-875.
13. Bickels J, Kollender Y, Wittig JC, Cohen N, Meller I, Malawer MM. Vacuum-assisted wound closure after resection of musculoskeletal tumors. *Clin Orthop*. 2005 Dec;441:346-50.
14. Bickels J, Kollender Y, Wittig JC, Meller I, Malawer MM. Function after resection of humeral metastases: analysis of 59 consecutive patients. *Clin Orthop*. 2005 Aug;(437):201-8.
15. Keschner MT, Bong MR, Wittig JC, Tejwani N. Pseudopathologic fracture of the neck of the femur. A case report. *J Bone Joint Surg Am*. 2004 Jul;86-A(7):1534-7.
16. Zhang Y, Howell RD, Alfonzo DT, Yu J, Kong L, Wittig JC, Liu CJ. IFI16 inhibits tumorigenicity and cell proliferation of bone and cartilage tumor cells. *Front Biosci*. 2007 Sep; 12:4855-63.
17. Chatha DS, Rybak LD, Wittig JC, Desai P. Elbow mass in a 9 year old girl. *Clin Orthop Relat Res*. 2007 Oct; 463: 237-43

18. Chatha DS, Rybak LD, Wittig JC, Desai P. Painful tibial lesion in a 16 year old girl. *Clin Orthop Relat Res.* 2007 Nov; 464:247-52
19. Chatha DS, Rybak LD, Wittig JC, Desai P. Ankle pain in a 31 year old man. *Clin Orthop Relat Res.* 2007 Dec; 465: 271-6
20. Kitay A, Rybak LD, Villalobos C, Desai P, Wittig JC. Primary leiomyosarcoma of the proximal tibia: case report and review of the literature. *Bull NYU Hosp JT Dis.* 2008;66(1):49-53.
21. Harsha A, Villalobos, CE, Rybak LD, Borys D, Wittig JC. Painful Distal Femur Lesion in a 13-year-old Girl. *Clin Orthop Relat Res.* 2009 Aug;467(8):2200-5
22. Rybak LD, Rosenthal DI, Wittig JC. Chondrosarcoma: radiofrequency ablation-alternative to surgical resection in selected cases. *Radiology.* 2009 May;251(2):599-604.
23. Koehler SM, Beasley MB, Chin CS, Wittig JC, Hecht AC, Quershi SA. A case report: Synovial sarcoma of the thoracic spine. *Spine J.* 2009 Dec;9(12):e1-6. Epub 2009 Oct 2009
24. Villalobos CE, Rybak LD, Steiner G C, Wittig JC. Osteblastoma of the Sternum. Case Report. Review of the literature. *The Bulletin of The Hospital for Joint Diseases.* Review of the literature. *Bull NYU Hosp JT Dis.* 2010;68(1):55-9
25. Chatha DS, Rybak LD, Wittig JC, Desai P. Chest Wall Mass in a 50-year-old Woman. *Clin Orthop Relat Res.* 2010 May;468(5):1462-6
26. Hochfelder J, Rybak LD, Garcia R, Wittig JC. Orthopaedic Case of the Month: A 30-year-old Woman with a Painful Forearm Mass. *Clin Orthop Relat Res.* 2010 Nov;468(11):3139-44
27. Smilowitz N, Villalobos CE, Rybak LD, Wittig JC. Clear Cell Sarcoma of The Soft Tissue Localized in The Elbow. Case Report. *Curr Ortho Prac.* January/February 2011 - Volume 22 - Issue 1 - p 104-108.
28. Rybak LD, Gangi A, Buy A, La Rocca Viera, Wittig JC. Thermal Ablation of Spinal Osteoid Osteomas Close to Neural Elements: Technical Considerations. *AJR* 2010; 195:293-298
29. Anderson MR, Jeng CL, Wittig JC, Rosenblatt MA. Anesthesia for Patients Undergoing Orthopedic Oncologic Surgeries. *J Clin Anesth.* 2010 Nov;22(7):565-72.

30. Rybak LD, Khaldi L, Wittig J, Steiner GC. Primary synovial chondrosarcoma of the hip joint in a 45-year-old male: case report and literature review. *Skeletal Radiol.* 2011 Oct;40(10):1375-81
31. Epelboin Y, Desai K, Garcia R, Wittig JC. Painful Femur Lesion in a 43-year-old Woman. *Clin Ortho Rel Res. Clin Orthop Relat Res.* 2012 Jul;470(7):2067-72. Epub 2012 May 12
32. Dean E, Villalobos C, Garcia R, Wittig JC. A 16-year-old Male with Multifocal, Painless Osseous Lesions. *Clin Orthop Relat Res.* 2012 Apr 28.
33. Lu Y, Villalobos CE, Zamora R, Wittig JC. Radiological Evaluation of Primary Bone Tumors. *JBJS.* Accepted for Publication

#### Video-Manuscripts and Publications

34. Vap AR, Hayden B, Villalobos CE, Silverman A, Malawer MM, Wittig JC. Extensile Axillary Approach for Schwannoma of the Brachial Plexus. 76<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons, Las Vegas, NV. February 25-28, 2009. Accepted for Video presentation.
35. Villalobos CE, Choi I, Silverman A, Hayden B, Wittig JC. Limb-Sparing Resection of the Scapula with Total Scapula Endoprosthetic Reconstruction: A Case of Multicentric Epithelioid Hemangioendothelioma. *Ann Surg Oncol.* Video manuscript. *Ann Surg Oncol.* Aug; 2009 16(8):2321-2.
36. Vap AR, Hayden B, Villalobos CE, Silverman A, Wittig JC, Malawer MM. The Extensile Surgical Approach for the Resection of a Large Tumors of the Axilla and Brachial Plexus. 64th Annual Meeting of the American Society for the Surgery of the Hand, San Francisco, CA. September 3-5, 2009. Accepted for video presentation
37. Bronson W, Hayden BL, Villalobos CE, Wittig JC, Malawer MM. Chondrosarcoma of the Scapula Treated with a Limb-Sparing Resection and Total Scapula Reconstruction. 64th Annual Meeting of the American Society for the Surgery of the Hand, San Francisco, CA. September 3-5, 2009. Accepted for Video presentation.
38. Wittig JC, Villalobos CE, Hayden BL, Silverman A. Osteosarcoma of the Proximal Humerus Treated with a Limb-Sparing Resection and Prosthetic Reconstruction. 64th Annual Meeting of the American Society for the Surgery of the Hand, San Francisco, CA. September 3-5, 2009. Accepted for Video presentation.

39. Wittig JC, Villalobos CE, Hayden BL, Silverman A, Azam I, Choi I. Recurrent Giant Cell Tumor of the Distal Humerus with a Limb-Sparing Resection and Prosthetic Reconstruction. 64th Annual Meeting of the American Society for the Surgery of the Hand, San Francisco, CA. September 3-5, 2009. Accepted for Video-presentation.
40. Wittig JC, Bronson W, Villalobos CE, Hayden BL, Malawer M. Radical Resection of the Scapula for Large Chondrosarcoma and Reconstruction with a Constrained Total Scapula Prosthesis. 95<sup>th</sup> Annual Clinical Congress of the American College of Surgeons, Chicago, IL. October 11-15, 2009. Accepted for Video presentation.
41. Hayden BL, Villalobos CE, Silverman AM, Choi I, Malawer MM, Wittig JC. Ewing's Sarcoma of the Scapula Limb Sparing Resection of the Scapula and Reconstruction with a Pediatric Total Scapula Tumor Prosthesis. 77<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons, New Orleans, LA. March 9-13, 2010. Accepted for Video presentation.
42. Hayden BL, Villalobos CE, Choi I, Malawer MM, Wittig, JC. Ewing's Sarcoma of the Scapula Limb-Sparing Resection of the Scapula Resection of the Scapula and Reconstruction with a Total Scapula Tumor Prosthesis. 77<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons, New Orleans, LA. March 9-13, 2010. Accepted for Video presentation.
43. Bronson W, Hayden BL, Villalobos CE, Choi I, Malawer MM, Wittig JC. Radical Resection of the Scapula for a Large Chondrosarcoma Reconstruction of the Shoulder Girdle with a Constrained Total Scapula Prosthesis. 77<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons, New Orleans, LA. March 9-13, 2010. Accepted for Video presentation.
44. Hayden BL, Villalobos CE, Silverman AM, Choi I, Malawer MM, Wittig JC. Osteosarcoma of Distal Femur with Skip Metastasis to Proximal Femur: Total Femur resection with Prosthesis Reconstruction. 77<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons, New Orleans, LA. March 9-13, 2010. Accepted for Video presentation.
45. Wittig JC, Villalobos CV, Hayden BL, Choi I, Silverman A, Malawer MM. Osteosarcoma of the Proximal Tibia: Limb-Sparing Resection of the Proximal Tibia and Reconstruction with a Modular Segmental Proximal Tibia Tumor Prosthesis. *Ann Surg Oncol*. 2010 Jul 7.
46. Silverman A, Villalobos CE, Hayden B, Wittig JC. Intra-articular Resection and Reconstruction with Modular Segmental Proximal Humerus Prosthesis for a Pathologic Fracture. 65<sup>th</sup> Annual Meeting of The American Society for Surgery of The Hand, Boston, MA. October 7-9, 2010. Accepted for Video presentation.

47. Wittig JC, Villalobos CE, Hayden BL, Silverman AD, Choi I, Malawer MM. Proximal Tibia Sarcoma: Limb-Sparing Resection, Prosthetic Reconstruction and Rotation of the Gastrocnemius Muscle. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation.
48. Wittig JC, Villalobos CE, Desai, K, Rybak LD. Radiofrequency Ablation of an Osteoid Osteoma of Calcaneus Bone. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation.
49. Wittig JC, Villalobos CE. Sacrococcygeal Chordoma: Intralesional Resection and Cryosurgery. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation.
50. Wittig JC, Villalobos CE, Hayden BL, Silverman A, Choi I, Malawer MM. Osteosarcoma of Distal Femur: Limb-Sparing Resection and Prosthetic Reconstruction. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation.
51. Wittig JC, Silverman A, Villalobos CE, Hayden BL. Chondrosarcoma of Proximal Femur: Limb-Sparing Resection and Prosthetic Reconstruction. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation
52. Wittig JC, Hayden BL, Villalobos CE, Silverman A, Malawer MM. Extensive Squamous Cell Carcinoma of the Shoulder Girdle: Limb-sparing Total Scapula and Proximal Humerus (Tikhoff-Linberg Type) Resection with Prosthetic and Soft Tissue Reconstruction. 96<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Washington, DC. October 3-7, 2010. Podium-Video Presentation
53. Hayden B, Villalobos CE, Silverman A, Malawer M, Wittig JC. Limb-Sparing total Scapula and Proximal Humerus (Tikhoff-Linberg Type) Resection with Prosthetic and Soft Tissue Reconstruction. 65<sup>th</sup> Annual Meeting of The American Society for Surgery of The Hand, Boston, MA. October 7-9, 2010. Accepted for Video presentation.
54. Moucha CS, Greendyk RA, Lerner BA, Silverman AM, Hayden BL, Villalobos CE, Wittig JC. Revision Arthroplasty with Use of a Total Femoral Replacement. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation.
55. Wittig JC, Lerner BA, Greendyk R, Villalobos CE, Hayden BL, Silverman AM. Radical Sacrectomy and Reconstruction for a High Grade Primary Sarcoma

- of the Sacrum. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation
56. Wittig JC, Lerner BA, Greendyk RA, Villalobos CE, Silverman AM, Hayden BA. Intermuscular Liposarcoma of the Posterior Thigh: Radical Resection and Sciatic Nerve Preservation. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation
  57. Wittig JC, Silverman AM, Villalobos CE, Hayden BL, Lerner BA. Chondrosarcoma of the Proximal Femur: Limb-Sparing Resection and Prosthetic Reconstruction. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation.
  58. Wittig JC, Silverman AM, Villalobos CE, Lerner BA, Hayden BL. Intraarticular Proximal Humerus Resection and Prosthetic Reconstruction for Pathologic Fracture. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation.
  59. Wittig JC, Villalobos CE, Hayden BL, Silverman AM, Lerner BA. Radical Resection of the Distal Humerus and Reconstruction with a Distal Humerus Tumor Prosthesis. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation
  60. Wittig JC, Villalobos CE, Hayden BL, Silverman AM, Lerner BA, Malawer MM. Primary MFH of Proximal Tibia: Limb-Sparing Resection with Prosthetic and Soft Tissue Reconstruction. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation
  61. Wittig JC, Villalobos CE, Silverman AM, Hayden BL, Lerner BA, Malawer MM. Osteosarcoma of the Distal Femur: Radical resection and Reconstruction with Distal Femur Tumor Prosthesis. 78<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Diego, CA. February 15-19, 2011. Accepted for Video presentation
  62. Wittig JC, Villalobos CE, Silverman AM, Hayden BL. Low Grade Chondrosarcoma of the Scapula: Limb-Sparing Partial Resection and Reconstruction. 79<sup>th</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; San Francisco, CA. February 7-11, 2012. Accepted for Video presentation
  63. Wittig JC, Villalobos CE, Silverman AM, Hayden BL. Giant Cell Tumor of Proximal Tibia: Curettage, Cryosurgery, and Fixation with Rush Rods. 79<sup>th</sup> Annual

Meeting of the American Academy of Orthopaedic Surgeons; San Francisco, CA. February 7-11, 2012. Accepted Video presentation

64. Ho Y, Villalobos CE, Wittig JC. Intraarticular Proximal Humerus Resection for Parosteal Osteosarcoma. 79th Annual Meeting of the American Academy of Orthopaedic Surgeons; San Francisco, CA. February 7-11, 2012. Accepted Video presentation
65. Wittig J, Villalobos CE, Hayden B, Silverman A. Partial Scapula Resection for a Large, Low Grade Chondrosarcoma. 98<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Chicago, IL. Sep-Oct 30-4, 2012
66. Wittig J, Villalobos CE, Hayden B, Silverman A, Comer B. Anterior Approach for Limb Sparing Resection of Tumors Involving the Distal Humerus: A technique that emphasizes meticulous neurovascular dissection, reconstruction with a modular distal humerus tumor prosthesis and multiple muscle transfers to optimize elbow function. 98<sup>th</sup> Annual Clinical Congress of the American College of Surgeons. Chicago, IL. Sep-Oct 30-4, 2012
67. Comer B, Hayden B, Villalobos CE, Wittig JC. Resection of Axillary Sarcoma. 80th Annual Meeting of the American Academy of Orthopaedic Surgeons; Chicago, IL. March 19-23, 2013. Accepted Video presentation
68. Comer B, Hayden B, Villalobos CE, Wittig JC. Non-Invasive”Magnetic” Distal Femoral Expandable Endoprosthesis. 80th Annual Meeting of the American Academy of Orthopaedic Surgeons; Chicago, IL. March 19-23, 2013. Accepted Video presentation
69. Comer B, Hayden B, Villalobos CE, Wittig JC. Radical Resection of the Glenoid and Scapular Neck for Sarcoma and Reconstruction. 80th Annual Meeting of the American Academy of Orthopaedic Surgeons; Chicago, IL. March 19-23, 2013. Accepted Video presentation
70. Gold P, Abrham A, Villalobos C, Zamora R, Wittig J. Proximal Femur Radical Resection and Reconstruction with Proximal Femur Tumor Prosthesis. 81<sup>st</sup> Annual Meeting of the American Academy of Orthopaedic Surgeons; New Orleans, LA. March 11-15, 2014

Reviews and Educationally Relevant Publications:

71. Wittig JC, Bickels J, Kellar-Graney K, Meller I, Malawer M. Limb-sparing surgery for high grade sarcomas of the proximal humerus. *Techniques in Shoulder and Elbow Surgery* 2001; 2(1):54-68.

72. Malawer M, Wittig JC. Overview of resections around the shoulder girdle resections: anatomy, surgical considerations and classification. In: Malawer M, Sugarbaker P, eds. *Musculoskeletal Cancer Surgery: Treatment of Sarcomas and Allied Diseases*. Lancaster, England: Kluwer Academic Publishers, 2001:179-202.
73. Malawer M, Wittig JC. Proximal humerus resection: the Tikhoff-Linberg procedure and its modifications. In: Malawer M, Sugarbaker P, eds. *Musculoskeletal Cancer Surgery: Treatment of Sarcomas and Allied Diseases*. Lancaster, England: Kluwer Academic Publishers, 2001: 519-551.
74. Malawer M, Wittig JC, Rubert C. Scapulectomy. In: Malawer M, Sugarbaker P, eds. *Musculoskeletal Cancer Surgery: Treatment of Sarcomas and Allied Diseases*. Lancaster, England: Kluwer Academic Publishers, 2001: 553-568.
75. Weinbroum AA, Maroumi N, Lang E, Niv D, Wittig JC, Rudick V. Anesthesia and perioperative pain management for limb-sparing surgery. In: Malawer M, Sugarbaker P, eds. *Musculoskeletal Cancer Surgery: Treatment of Sarcomas and Allied Diseases*. Lancaster, England: Kluwer Academic Publishers, 2001: 569-581.
76. Wittig JC, Bickels J, Kellar-Graney K, Priebat D, Malawer M. Adjuvant therapy for malignant bone tumors. In: Menendez L, ed. *Orthopaedic Knowledge Update: Musculoskeletal Tumors*. American Academy of Orthopaedic Surgeons. 2002: 157-174.
77. Wittig JC, Lamont JG. Bone metastases from breast cancer. In: Roses DF, ed. *Breast Cancer*. Philadelphia, Pennsylvania: Elsevier, Churchill, Livingston Publishers, 2005: 666-676.
78. Wittig JC, Bickels J, Priebat D, Jelinek J, Kellar-Graney K, Schmookler B, Malawer M. Osteosarcoma: a multidisciplinary approach to diagnosis and treatment. *Am Fam Phys*, 2002; 65:1123-1132.
79. Malawer M, Wittig JC, Kellar-Graney K. Tumors of the shoulder girdle. In: Iannotti JP, Williams G, eds. *Disorders of the Shoulder Girdle, Second Edition*. Philadelphia, PA: Lippincott, Williams and Wilkins, 2006: 1155-1199.
80. Wittig J, Villalobos CE. Other Bone Sarcomas. In: Benevenia J ed. *Orthopedic Knowledge Update: Musculoskeletal Tumors Second Edition*. Academy of Orthopaedic Surgeons 2007:197-204.
81. Wittig JC, Malawer M, Kellar-Graney K. Total Scapular Resections With Endoprosthetic Reconstruction. In: Weisel S, ed. *Operative Techniques in Orthopedic Surgery*. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1766



82. Malawer MM, Wittig JC, Kellar-Graney K. Proximal Humerus Resection With Endoprosthetic Replacement: Intra-articular and Extra-Articular Resections. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1793
83. Wittig J, Malawer MM. Distal Humerus Resection with Prosthetic Reconstruction. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1807
84. Wittig JC, Malawer MM, Kellar-Graney K, Henshaw RM. Axillary Space Exploration and Resections. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1825
85. Wittig JC, Malawer MM. Buttockectomy. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1876
86. Wittig J, Malawer M. Posterior Flap Hemipelvectomy. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1891
87. Wittig J, Malawer M. Anterior Flap Hemipelvectomy. In: Weisel S, ed. Operative Techniques in Orthopedic Surgery. First Edition. Philadelphia, PA. Lippincott Williams & Wilkins, 2011. Vol 2, 1902

Abstracts:

88. Wittig JC, Xi T, Black VH. A relationship between ethylmorphine demethylase and 6-beta hydroxylase in guinea pig adrenal. Seventy Fourth Annual Meeting, Endocrine Society, San Antonio, Texas, 1992.
89. Wittig JC, Xi T, Black VH. A Relationship between ethylmorphine demethylase and 6-beta hydroxylase in guinea pig adrenal. Ninth International Congress of Endocrinology, Nice, France, 1992.
90. Black VH, Wittig JC, Wang A, Shaw P. Induction of CYP1A1, but not of an immunochemically related 52K P450, in adrenals of 3-methylcholanthrene-treated guinea pigs. Eighth International Conference on Cytochrome P450, Lisbon, Portugal, 1993.
91. Wittig JC, Black VH. Guinea Pig Adrenocortical microsomes catabolize androstenedione and cortisol in a manner distinct from liver microsomes. Thirty

Third Annual Meeting, American Society for Cell Biology, New Orleans, Louisiana, 1993.

92. Horangic N, Wittig JC, Michelsen H, Parisien M, Dick HM. Primary leiomyosarcoma of bone: a case report. American Orthopaedic Association 31<sup>st</sup> Annual Residents' Conference, Sacramento, California, 1999.
93. Nercessian O, Picaluga F, Wittig JC, Eftekhar N. The trend of heterotopic ossification following charnley total hip arthroplasty between 1970-1990. American Orthopaedic Association 31<sup>st</sup> Annual Residents' Conference, Sacramento, California, 1998.
94. Wittig JC, Nercessian O, Kiernan H, Dick HM. Limb salvage for neoplastic disease in the femur: results with massive allografts. American Orthopaedic Association 31<sup>st</sup> Annual Residents' Conference, Sacramento, California, 1998.
95. Wittig JC, Bickels J, Kellar K, Meller I, Malawer M. Palliative forequarter amputation for metastatic carcinoma to the shoulder girdle region. Annual Meeting of the Musculoskeletal Tumor Society, Gainesville, Florida, 2000.
96. Wittig JC, Bickels J, Jelinek J, Priebat D, Kellar-Graney K, Shmookler B, Malawer M. Telangiectatic high grade extremity soft tissue sarcomas: a clinicopathologic analysis of 15 cases. Annual Meeting of the Musculoskeletal Tumor Society, Gainesville, Florida, 2000.
97. Wittig JC, Bickels J, Kim F, Kellar K, Malawer M. Osteosarcoma of the proximal humerus: long term results following extraarticular resection and endoprosthetic reconstruction. Annual Meeting of the Musculoskeletal Tumor Society, Gainesville, Florida, 2000.
98. Bickels J, Wittig JC, Kollender Y, Henshaw R, Meller I, Malawer M. Reconstruction of hip joint stability after proximal and total femur resection. Annual Meeting of the American Academy of Orthopaedic Surgeons, San Francisco, California, 2001.
99. Bickels J, Wittig JC, Kollender Y, Neff R, Kellar-Graney, Meller I, Malawer M. Reconstruction of the extensor mechanism after proximal tibia resection with endoprosthetic reconstruction. Annual Meeting of the American Academy of Orthopaedic Surgeons, San Francisco, California, 2001.
100. Bickels J, Price W, Kollender Y, Wittig J, Kellar-Graney K, Meller I, Malawer M. Metastatic renal cell carcinoma of bone: indications and technique of surgical intervention. Annual Meeting of the American Academy of Orthopaedic Surgeons, San Francisco, California, 2001.

101. Wittig JC, Bickels J, Kellar-Graney K, Kim F, Malawer M. Long term evaluation of endoprosthetic reconstruction following extraarticular resection of the proximal humerus for osteosarcoma. Annual Meeting of the American Academy of Orthopaedic Surgeons, San Francisco, California, 2001.
102. Moss D, Wittig JC, Bickels J, Rudzki J, Henshaw R, Malawer M. Minimally invasive burr-down technique vs. en bloc resection for osteoid osteoma: results from a single institution over a 20 year period. Annual Meeting of the American Academy of Orthopaedic Surgeons, San Francisco, California, 2001.
103. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. Constrained (rotator cuff substituting) total scapular prosthesis for reconstruction following tikhoff-linberg resection: description of a new prosthesis and anatomic reconstruction. Annual Meeting of the Musculoskeletal Tumor Society, Baltimore, Maryland, 2001.
104. Wodajo F, Wittig JC, Kumar D, Priebat DA, Mansour KL, Henshaw RM, Malawer MM. Successful treatment of high-grade soft-tissue sarcoma with induction (neoadjuvant) chemotherapy: clinicopathological analysis of thick capsule formation allowing less extensive surgical resection. Annual Meeting of the Musculoskeletal Tumor Society, Baltimore, Maryland, 2001.
105. Wittig J, Cruz L, Chou WM, Wodajo F, Seibel N, Kumar D, Malawer M, Priebat DA. Expression of Her-2/neu (HER2) and epidermal growth factor receptor (EGFR) in osteosarcoma. Annual Meeting of the American Society of Clinical Oncology, San Francisco, California, 2001.
106. Wodajo F, Wittig JC, Kumar D, Priebat DA, Mansour KL, Henshaw RM, Malawer MM. Successful treatment of high-grade soft-tissue sarcoma with induction (neoadjuvant) chemotherapy: clinicopathological analysis of thick capsule formation allowing less extensive surgical resection. Annual Meeting of the American Society of Clinical Oncology, San Francisco, California, 2001.
107. Wittig JC, Bickels J, Kim F, Kellar K, Malawer M. Osteosarcoma of the proximal humerus: long term results following extraarticular resection and endoprosthetic reconstruction. International Society of Limb Sparing Surgery (ISOLS), Birmingham, UK, 2001.
108. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. The concept of a gluteal (buttock) compartment: radiopathological considerations, indications and surgical technique of resection. International Society of Limb Sparing Surgery (ISOLS), Birmingham, UK, 2001.
109. Wittig J, Cruz L, Chou WM, Wodajo F, Seibel N, Kumar D, Malawer M, Priebat DA. Expression of Her-2/neu (HER2) and epidermal growth factor receptor

- (EGFR) in osteosarcoma. International Society of Limb Sparing Surgery (ISOLS), Birmingham, UK, 2001.
110. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. Constrained (rotator cuff substituting) total scapular prosthesis for reconstruction following tikhoff-linberg resection: description of a new prosthesis and anatomic reconstruction. International Society of Limb Sparing Surgery (ISOLS), Birmingham, UK, 2001.
  111. Wodajo F, Wittig JC, Kumar D, Priebat DA, Mansour KL, Henshaw RM, Malawer MM. Successful treatment of high-grade soft-tissue sarcoma with induction (neoadjuvant) chemotherapy: clinicopathological analysis of thick capsule formation allowing less extensive surgical resection. International Society of Limb Sparing Surgery (ISOLS), Birmingham, UK, 2001.
  112. Wittig JC, Bickels J, Wodajo F, Kellar-Graney K, Malawer M. Hemipelvectomy: a useful procedure based on 20 years of surgical experience. Annual Meeting of the American Academy of Orthopaedic Surgeons, Dallas, Texas, 2002.
  113. Bickels J, Wittig JC, Kollender Y, Meller I, Malawer M. Reconstruction following total scapular resection: humeral suspension versus endoprosthetic reconstruction. Annual Meeting of the American Academy of Orthopaedic Surgeons, Dallas Texas, 2002.
  114. Wodajo F, Bickels J, Wittig JC, Kollender Y, Meller I, Malawer M. Curettage resection and cryosurgery for extremity low grade chondrosarcoma: surgical indications and results with an average of six years of follow-up. Annual Meeting of the American Academy of Orthopaedic Surgeons, Dallas, Texas, 2002.
  115. Wodajo F, Wittig JC, Bickels J, Henshaw R, Mansour K, Priebat D, Kumar D, Malawer M. Successful treatment of high grade soft tissue sarcomas with induction (neoadjuvant) chemotherapy: analysis and proposed grading system for thick capsule formation allowing for less extensive surgical resection. Annual Meeting of the American Academy of Orthopaedic Surgeons, Dallas, Texas, 2002.
  116. Bickels J, Wittig JC, Oren R, Kollender Y, Kellar-Graney K, Malawer MM. Tumors of the distal radius: surgical anatomy and principles of resection and reconstruction. Annual Meeting of the European Musculoskeletal Oncology Society (EMSOS), Leiden, The Netherlands, May 22-24, 2002. *Sarcoma* 6(Suppl):42,2002.
  117. Bickels J, Wittig JC, Oren R, Kollender Y, Kellar-Graney K, Malawer MM. Enchondroma of the hand. Management with curettage and cemented intramedullary hardware. Annual Meeting of the European Musculoskeletal

- Oncology Society (EMSOS), Leiden, The Netherlands, May 22-24, 2002. *Sarcoma* 6(Suppl):42-43,2002.
118. Bickels J, Wittig JC, Oren R, Kollender Y, Kellar-Graney K, Malawer MM. Surgical management of humeral metastases: principles of surgical intervention, functional, and oncological outcomes. Annual Meeting of the European Musculoskeletal Oncology Society (EMSOS), Leiden, The Netherlands, May 22-24, 2002. *Sarcoma* 6(Suppl):21,2002.
  119. Bickels J, Wittig JC, Oren R, Kollender Y, Kellar-Graney K, Malawer MM. Reconstruction following total scapular resection. Analysis of humeral suspension versus endoprosthetic reconstruction. Annual Meeting of the European Musculoskeletal Oncology Society (EMSOS), Leiden, The Netherlands, May 22-24, 2002. *Sarcoma* 6(Suppl):44,2002.
  120. Bickels J, Wittig JC, Oren R, Kollender Y, Kellar-Graney K, Malawer MM. Limb-sparing resections of the shoulder girdle. A long-term follow-up study. Annual Meeting of the European Musculoskeletal Oncology Society (EMSOS), Leiden, The Netherlands, May 22-24, 2002. *Sarcoma* 6(Suppl):41,2002.
  121. Maman E, Bickels J, Wittig JC, Kellar-Graney KL, Kollender Y, Meller I, Malawer MM. Extensile exposure of the axilla. 70<sup>th</sup> Annual Meeting of the American Academy of Orthopedic Surgeons, New Orleans, Louisiana. February 5-9, 2003.
  122. Bickels J, Wittig JC, Kollender Y, Kellar-Graney KL, Meller I, Malawer MM. Surgical management of humeral metastases. Principles of surgical intervention, functional, and oncological outcomes. 70<sup>th</sup> Annual Meeting of the American Academy of Orthopedic Surgeons, New Orleans, Louisiana. February 5-9, 2003.
  123. Bickels J, Wittig JC, Kollender Y, Kellar-Graney KL, Meller I, Malawer MM. Limb-sparing resections of the shoulder girdle. A long-term follow-up study. 70<sup>th</sup> Annual Meeting of the American Academy of Orthopedic Surgeons, New Orleans, Louisiana. February 5-9, 2003.
  124. Hayden BL, Silverman A M, Villalobos CE, Malawer MM, Wittig JC. Osteosarcoma of the Proximal Humerus: Limb-sparing Resection and Prosthetic Reconstruction. The International Symposium of Limb Salvage and The Musculoskeletal Tumor Society, Boston, MA. September 23-26, 2009.

## Jay F. Malcynsky



### Education

- June 1981 **University of Bridgeport School of Law**  
Bridgeport, Connecticut  
*Juris Doctor Degree*
- June 1976 **Fairfield University**  
Fairfield, Connecticut  
*Bachelor of Science Degree/Psychology, Biology*

### Honors

- October 2001 2001 Quinnipiac School of Law Distinguished Alumni Award for Public Service
- 1978 - 1981 Recipient of the Stern-Browner Scholarship from the University of Bridgeport School of Law  
Selected for membership in Phi Delta Phi

### Professional Experience

- 1996 - Present **Law Offices of Jay F. Malcynsky**  
*New Britain, Connecticut 06051*  
*Principal Partner. Government and administrative law.*
- 1984 to Present **Gaffney, Bennett & Associates, Inc.**  
*New Britain, Connecticut 06051*  
*Founder/Managing Partner*  
Responsibilities: Managing daily operations of a small corporation engaged in the business of government relations and political consulting; lobbying State and Federal legislators and officials on behalf of more than 75 private clients, corporate businesses and trade associations; monitoring legislative and administrative activities impacting clients business interests; drafting legislation and/or regulations designed to implement specific legislative objectives.
- September 1995 - 2000 **George A. Tomasso Construction Company**  
*New Britain, Connecticut 06051*  
*President.* As court appointed conservator for George A. Tomasso duties included the successful completion or transition of more than \$300 million in construction contracts with the Connecticut Department of Transportation after the incapacitation of the company's chief manager and sole owner, George A. Tomasso, as well as the orderly dissolution of this and three related corporations.
- 1984 - 1996 **Gaffney Law Associates**  
*New Britain, Connecticut 06051*  
*Attorney of Counsel.* Responsibilities included handling of all criminal files for the firm; civil litigation; zoning matters; real estate; administrative law.
- 1983 - 1984 **Department of Education, Office of Civil Rights**  
*Washington, D.C.*  
*Trial Attorney, Litigation Division.* Responsibilities included supervision of case development; litigation and enforcement process (Federal court trials and administrative proceedings); negotiations of settlements; drafting of briefs, motions and pleadings. Additional responsibilities included the preparation of legal memorandums and advisory opinions to the Secretary, Under Secretary and Assistant Secretary of the Department of Education.

1982 and 1983

**U.S. House of Representatives, Committee on the District of Columbia**

*Washington, D.C.*

*Minority General Counsel.* Responsibilities included legislative research and analysis; legal and legislative drafting; preparation of testimony and preliminary reports for Congressional hearings; taking witness testimony before the Committee; preparation of Committee reports; and performance of administrative duties and supervision of staff, as Assistant Staff Director.

1981

**State of Connecticut, Office of the Public Defender**

*Hartford, Bridgeport, New Britain, Connecticut.*

*Special Public Defender.* Duties comprised of defending criminal clients in the Superior Court of the State of Connecticut.

1980 to 1981

**Superior Court of Connecticut, Prosecutorial Clinic**

*Connecticut.*

*Assistant to the Prosecutor.* Responsibilities included screening cases; plea bargaining; voir dire; representing the State in criminal arraignments and trials, and legal research and writing (Per Diem Prosecutor 1981).

1979 - 1980

**Superior Court of Connecticut**

*Hartford Judicial District, Connecticut.*

*Law Clerk.*

1977 - 1978

**Office of Congressman Steward B. McKinney**

*Washington, D.C.*

*Legislative Assistant to Congressman McKinney.*

**Professional Associations / Distinctions**

Admitted to practice, Connecticut Bar, November 1981

Admitted to practice, District of Columbia Bar, December 1983

Member of the Connecticut Bar Association, District of Columbia Bar Association, Federal Bar Association, Association of American Trial Lawyers, American Bar Association, Connecticut Trial Lawyers Association

Board of Directors, Connecticut Legal Services, 1996 - Present

Co-Chairman, Campaign for Justice, 1997 - Present

Dean's Advisory Council, Quinnipiac University School of Law, 2002 - present

Board of Trustees, Nutmeg State Games, 1995 - Present  
Chairman, Annual Fundraising Dinner, 1995 - Present

Board of Directors (Vice Chairman), Federal Home Loan Bank of Boston, 2002 - Present

Commissioner, State of Connecticut Judicial Selection Commission, 1999 - 2002

Corporator, New Britain General Hospital, 2000 - Present

Corporator, Klingberg Family Center, New Britain, 2001 - Present

Board of Directors (Secretary), University of Connecticut Foundation, 2002 - 2012

Board of Directors, Chester Little League, 1999-2008

# Peter Leonard

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Fifteen years of professional experience and post graduate education in horticulture. Academic work includes vocational high school training in floriculture, a B.S in horticulture science and an M.S in plant breeding. Industry experience includes positions as a grower, supervisor, and sales representative for both wholesale and retail greenhouse and garden center businesses.

## Experience

- 2012-present    Section grower    CK Greenhouses, Cheshire, CT
- Responsible for six acres of greenhouses of a thirty acre farm.
  - Oversee all propagation.
  - Assist in development and application of farm's IPM plan.
  - Manage feed pH/EC
  - Time, apply, and document pesticide and PGR applications.
  - Manage greenhouse environment and watering with ARGUS, MICROGROW, GTI, and IRRITROL systems.
  - Manage crew of farm hands.
  - Yo hablo un poquito de español tambien, though not a fluent speaker.
- 2011    Plant healthcare technician    Natureworks Landscape Services, Walpole, MA
- Develop and administer plant healthcare service line for high-end residential clients in greater Boston.
- 2008-2011    Graduate assistant    University of Conn. Dept. of Plant Science, Storrs, CT
- Advisee of Mark Brand, Ph.D. professor of plant breeding.
  - Developed genetic marking and tissue culture protocols.
  - Published research: Leonard, P.L., M.H Brand, B.A. Connolly, and S.G. Obae. 2008. Investigations into the origin of *Aronia mitschurinii* using amplified fragment length Polymorphism Analysis. HortSci 48(5)1-5.
- 2005-2010    Nursery supervisor & sales representative    New England Nurseries, Bedford, MA
- Maintain eight acres of finish plant material.
  - Supervise crews of seasonal workers.
  - Assist retail and wholesale customers with plants and technical advice.
- 1998-2004    Nursery supervisor & assistant grower    Stott's Nursery, Chelmsford, MA
- Assist with 10,000 sq.ft. of greenhouse bedding plant production.
  - Maintain quality of finish material
  - Assist customers with plants and technical advice.

## Education

- 2011    M.S. Plant Science, University of Connecticut  
2007    B.S. (magna cum laude) Horticulture science, University of Maine  
2004    B.S. Aviation Management, Daniel Webster College  
2000    Nashoba Valley Vocational Technical High School – Concentration floriculture

## Professional Memberships

- Massachusetts Horticultural Society
- Connecticut Greenhouse Growers Association

**References upon request**





October 17, 2013

Mr. Kayvan Khalatbari  
Principal  
Denver Relief Consulting  
1 Broadway  
Suite A200  
Denver, Colorado 80203

**Re: Connecticut Medical Marijuana Demand Model**

Dear Mr. Khalatbari:

The medical cannabis industry in Connecticut is in its nascent stages and Denver Relief Consulting (DRC) is currently assisting clients to navigate the regulatory process to gain approval for dispensaries and grow operations. DRC retained BBC Research & Consulting (BBC) to devise a methodology to quantify eligible and likely patrons of medicinal marijuana establishments that may suffer from certain qualifying medical conditions, which include cancer, HIV/AIDS, multiple sclerosis, and other conditions. This document summarizes BBC's methodology and presents the results of our model of potential patient demand for medical marijuana in Connecticut.

## **Background**

In 2012, Connecticut approved legislation that allowed for the cultivation and sale of medical marijuana. Residents with a physician-documented qualifying debilitating medical condition as defined by Connecticut General Statutes § 21a-408—cancer, glaucoma, positive status for HIV or AIDS, Parkinson's disease, multiple sclerosis, damage to the nervous tissue of the spinal cord with objective neurological indication of intractable spasticity, epilepsy, cachexia, wasting syndrome, Crohn's disease, and posttraumatic stress disorder—may apply for a medical marijuana license. This initial list of qualifying conditions can be revised by the Connecticut Department of Consumer Protection (DCP). The regulation also requires that patients must have an ongoing relationship with their doctor in order to obtain a valid prescription for medical marijuana.

The statute limits the amount of marijuana production facilities in the state to between 3 and 10 grow operations. Dispensaries are not overtly limited in the current statute language. The current version of the statute requires at least one dispensary in Connecticut and leaves DCP the ability to issue more dispensary permits to "assure access" to medical marijuana for eligible

patients. This report provides an estimate of the market size for medical marijuana in Connecticut that can be used to establish a demand baseline for further estimation of the appropriate amount of production facility and dispensary licenses.

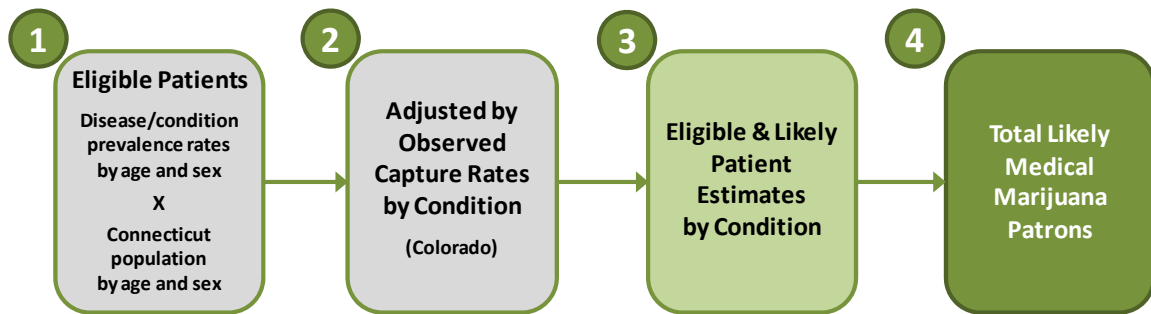
## Methodology

BBC estimated the number of eligible patients in Connecticut by applying state and national prevalence rates to the qualifying debilitating medical conditions allowed by law. Using observed capture rates from Colorado, BBC estimated the number of potential patients and potential demand for medical marijuana.

Colorado capture rates are used because not all patients suffering from qualified conditions are accepting of medical marijuana as treatment. Colorado was chosen from a group of five states that have adopted medical marijuana enabling legislation because it was the only state that satisfied the following criteria: (1) a regulated dispensary market model; (2) tracking of license holders by qualifying condition; (3) maturity in the system to allow for doctor and patient adoption. The methodology assumes that eligible patients in Connecticut will elect to use medical marijuana for treatment of their condition in roughly the same frequency as patients in Colorado.

The resulting calculation, shown in the diagram below, yields an estimate of eligible and likely medical marijuana license holders in Connecticut.

**Figure 1.**  
**Connecticut Medical Marijuana Demand Model**



Source: BBC Research & Consulting Connecticut Medical Marijuana Demand Model.

## Market Area

Due to the potential limitations in the amount of licensed production and retail facilities, the relevant geographic market area for this study is the state of Connecticut. Figure 2 characterizes the state's population.

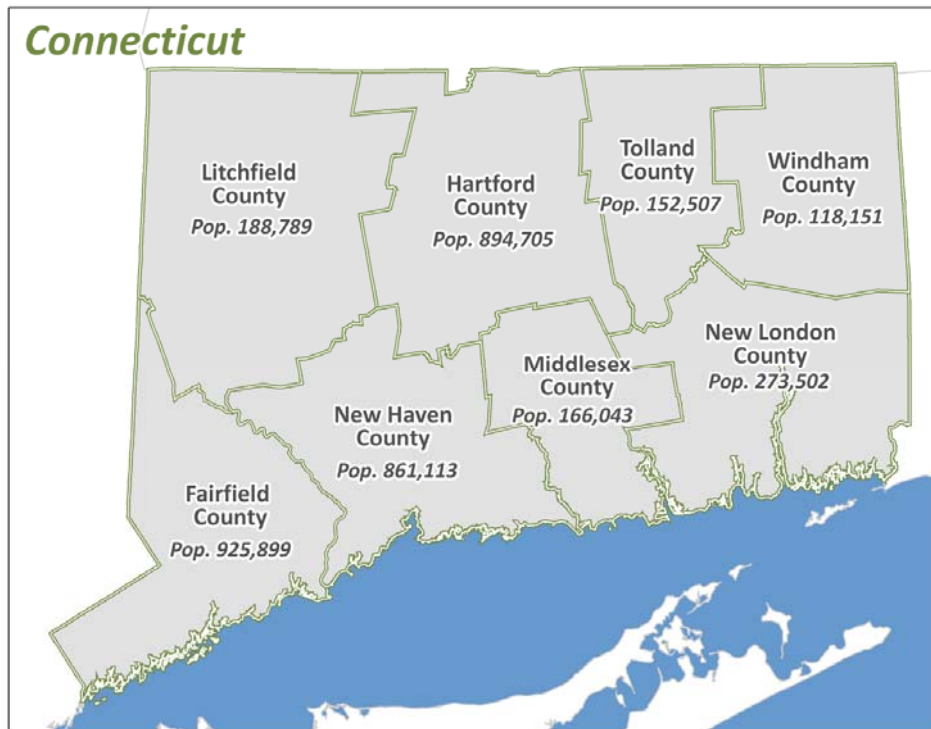
**Figure 2.**  
**State of Connecticut Population Characteristics**

Source:  
BBC Research & Consulting from the 2010 Census.

	Population	Percent
<b>Total population</b>	<b>3,574,097</b>	
Male	1,739,614	49 %
Female	1,834,483	51
<b>Total population, age 18 and older</b>	<b>2,658,321</b>	
18-29	442,043	17 %
30-44	690,670	26
45-59	815,754	31
60-69	352,576	13
70-79	194,915	7
80+	162,363	6

Figure 3, shows the state’s population distribution by county.

**Figure 3.**  
**Population Distribution by County**



Source: BBC Research & Consulting from the 2010 American Community Survey.

## Prevalence of Debilitating Medical Conditions

Figure 4 presents the prevalence rates for the debilitating conditions that qualify for a medical marijuana license in Connecticut for which such rates are available.<sup>1</sup> With the exception of cancer and HIV/AIDS, prevalence rates for the conditions and diseases shown in Figure 4 are based on estimates for the United States. The prevalence rates for cancer and HIV/AIDS are specific to the state of Connecticut. The prevalence of some conditions varies by gender, age and race/ethnicity.

Ranges of prevalence are shown for cachexia, epilepsy, multiple sclerosis, and Parkinson's disease. These ranges represent the upper and lower bound estimates at the 95 percent confidence level of the point estimate for each condition's prevalence. For cancer, Crohn's disease, glaucoma, HIV/AIDS, posttraumatic stress disorder and spinal cord injury only point estimates of prevalence are available in the literature.

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<sup>1</sup> Cachexia and wasting syndrome are typically associated with other conditions, such as cancer or HIV/AIDS, and their prevalence rates are based on other conditions. For example, some studies estimate that 50 percent of cancer patients also suffer from cachexia. Including the prevalence of cachexia in cancer or HIV/AIDS patients would result in double-counting. As such, the prevalence of cachexia is calculated for conditions not already included in the analysis—chronic obstructive pulmonary disease, chronic heart failure and end-stage renal failure. BBC was unable to identify prevalence rates for damage to the nervous tissue of the spinal cord with objective neurological indication of intractable spasticity. As a proxy, we employ the prevalence of spinal cord injuries.

**Figure 4.  
Debilitating  
Medical Condition  
Prevalence Rates**

**Note:**

Prevalence rates shown are the percentage of the population with the condition or disease. All are age-adjusted except those conditions—glaucoma and PTSD—whose prevalence is based on age. Spinal cord injury is a proxy for damage to the nervous tissue of the spinal cord with objective neurological indication of intractable spasticity.

**Source:**

BBC Research & Consulting Connecticut Medical Marijuana Demand Model. For individual prevalence sources by condition see endnotes: Cancer<sup>i</sup>, Cachexia<sup>ii</sup>, Crohn's disease<sup>iii</sup>, Epilepsy<sup>iv</sup>, Glaucoma<sup>v</sup>, HIV/AIDS<sup>vi</sup>, Multiple Sclerosis<sup>vii</sup>, Parkinson's disease<sup>viii</sup>, Posttraumatic Stress Disorder<sup>ix</sup>, Spinal Cord Injury.<sup>x</sup>

Condition	Female Population	Male Population	Total Population
Cancer	5 %	5 %	%
Cachexia/Wasting syndrome			6.5 - 8.6
Crohn's disease			0.3
Epilepsy			0.3 - 1.8
Glaucoma (prevalence by age cohort)			
40-49			0.7
50-59			1.0
60-69			1.8
70-79			3.9
>80			7.7
HIV/AIDS	0.3	0.8	
Multiple Sclerosis	0.1 - 0.2	0.05 - 0.07	
Parkinson's disease (prevalence by race/ethnicity and gender)			
White	1.3 - 1.4	2.1 - 2.3	
Black	0.8 - 1.2	1.2 - 1.4	
Hispanic	1.3 - 1.4	1.7 - 2.0	
Asian	0.9 - 1.0	1.3 - 1.5	
Posttraumatic Stress Disorder (prevalence by age cohort)			
18-29			6.3
30-44			8.2
45-59			9.2
60+			2.5
Spinal cord injury			0.1

By applying the condition prevalence rates to Connecticut's population, we estimate the total number of individuals in Connecticut with a debilitating medical condition that would qualify them to apply for a medical marijuana license under the current law. To the extent possible, prevalence rates are applied to the appropriate subpopulations and then summed to calculate the number of qualified patients. Figure 5 on the following page presents these totals.

The lower and upper bound estimates represent the potential deviation from the point estimate for certain conditions. Unlike HIV/AIDS and cancer, whose prevalence in the population is documented by the patient through cancer and HIV/AIDS surveillance, the prevalence of other conditions are calculated by the medical and research profession using a variety of statistical techniques. As such, these point estimates are not necessarily the exact number of individuals with such a condition. Rather, these estimates are calculated with such statistical reliability that the point estimate of prevalence would be the same 95 out of 100 times (95 percent confidence level) if the study were repeated over and over. The lower and upper bound estimates reflect the margin of error around the point estimates.

**Figure 5.  
Number of Potential Medical  
Marijuana Patients by  
Qualifying Condition**

Note:

Spinal cord injury is employed as a proxy for damage to the nervous tissue of the spinal cord with objective neurological indication of intractable spasticity.

Source:

BBC Research & Consulting Connecticut Medical Marijuana Demand Model.

Condition	# of People (Lower Bound Estimate)	# of People (Point Estimate)	# of People (Upper Bound Estimate)
Cancer	175,918	175,918	175,918
Cachexia	234,165	271,138	308,112
Crohn's disease	10,093	10,136	10,179
Epilepsy	9,650	17,870	62,904
Glaucoma	35,568	35,568	35,568
HIV/AIDS	20,091	20,091	20,091
Multiple Sclerosis	3,416	4,047	4,646
Parkinson's disease	54,841	57,688	60,535
PTSD	175,923	177,279	178,636
Spinal cord injury	2,465	2,465	2,465
<b>Overall</b>	<b>722,130</b>	<b>772,202</b>	<b>859,054</b>

### Medical Marijuana Capture Rates

Not all patients who qualify for a medical marijuana license will seek one out. Based on data from Colorado, BBC calculated capture rates to estimate the proportion of qualified patients, by condition, who pursued a license in Colorado. Figure 6 presents an example of how a capture rate for a condition, here HIV/AIDS, is calculated. As shown, in Colorado, the capture rate for HIV/AIDS is equal to the total number of licensed patients with HIV/AIDS divided by the number of people in the state with HIV/AIDS.

**Figure 6.  
Example of Calculating Medical Marijuana Capture Rates: HIV/AIDS in Colorado**



Source: BBC Research & Consulting Connecticut Medical Marijuana Demand Model and Colorado's Medical Marijuana Registry Update (June 30, 2013).

Using the same methodology outlined in Figure 6, BBC calculated capture rates for each of the qualifying debilitating medical conditions allowed under Connecticut law using data from Colorado's registry and potential patients in Colorado. Due to differences in allowed conditions, BBC used the average capture rate of all conditions for those conditions unique to Connecticut. Figure 7 on the following page presents the capture rates.

**Figure 7.  
Capture Rates**

Note:

Conditions with a capture rate of 2.829% are the average capture rate for all conditions. The average is used because Colorado does not collect data on all of the conditions allowed by Connecticut law.

Source:

BBC Research & Consulting Connecticut Medical Marijuana Demand Model.

Condition	Colorado Capture Rate
Cancer	1.394 %
Cachexia	3.238
Crohn's disease	2.829
Epilepsy	7.254
Glaucoma	2.682
HIV/AIDS	5.590
Multiple Sclerosis	2.829
Parkinson's disease	2.829
PTSD	2.829
Spinal cord injury	2.829
<b>Average</b>	<b>2.829 %</b>

### Medical Marijuana Patient Estimates

To calculate the potential number of qualified patients in Connecticut who may pursue a medical marijuana license, BBC applied the capture rates (Figure 7) to the number of potential medical marijuana patients (Figure 5). Figure 8 presents the potential number of medical marijuana patients by condition for Connecticut. Estimated total potential patient range from 19,971 to 26,324. The patient estimates calculated using the average capture rate, may have higher (or lower) capture rates in practice. The patient estimates shown in Figure 8 present the best estimates that can be calculated using available data and reasonable assumptions.

**Figure 8.  
Medical Marijuana Patient  
Estimates by Condition**

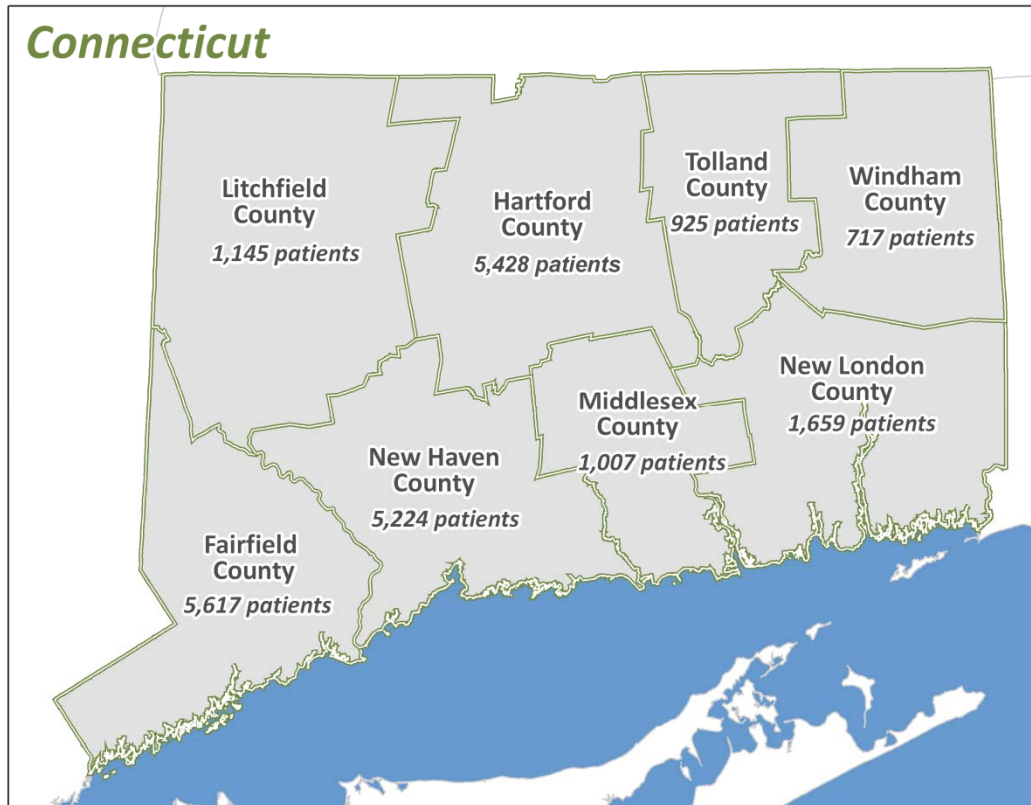
Source:

BBC Research & Consulting Connecticut Medical Marijuana Demand Model.

Condition	# of Patients (Lower Bound Estimate)	# of Patients (Point Estimate)	# of Patients (Upper Bound Estimate)
Cancer	2,452	2,452	2,452
Cachexia	7,582	8,779	9,976
Crohn's disease	286	287	288
Epilepsy	700	1,296	4,563
Glaucoma	954	954	954
HIV/AIDS	1,123	1,123	1,123
Multiple Sclerosis	97	115	131
Parkinson's disease	1,552	1,632	1,713
PTSD	4,977	5,016	5,054
Spinal cord injury	70	70	70
<b>Total patients</b>	<b>19,791</b>	<b>21,723</b>	<b>26,324</b>

Figure 9 shows how medical marijuana patients may be geographically distributed across the state based on population density using the mid-range point estimates.

**Figure 9.**  
**Potential Geographic Distribution of Medical Marijuana Patients**



Note: The geographic distribution is calculated by multiplying the county's percentage of the state's population by the total number of estimated patients.

Source: BBC Research & Consulting Connecticut Medical Marijuana Demand Model.

## Summary

BBC estimated the number of potential medical marijuana patients in Connecticut based on the prevalence of the qualifying conditions in the state's population and capture rates calculated using data from a regulated, mature medical marijuana state. Based on available data and reasonable assumptions, we estimated that initially 21,723 Connecticut residents will potentially seek medical marijuana licensure, and this number may range from 19,971 to 26,324.



We hope this information is useful as your client seeks a license from the state of Connecticut.

Sincerely,

A handwritten signature in black ink, appearing to read 'AO', with a long horizontal flourish extending to the right.

Adam Orens  
Director

# Appendix

This Appendix presents information about family income poverty thresholds and profiles the earned and supplemental income and assistance received by households by county in Connecticut.

## Connecticut Poverty Thresholds

Each year, the U.S. Department of Health and Human Services releases the Federal Poverty Income Guidelines (FPIG) by family size. Figure A-1 presents these income guidelines at various thresholds for Connecticut.

**Figure A-1.**  
**CT Federal Poverty Income Guidelines, 2013**

Federal Poverty Income Guidelines (FPIG)							
Family Size	50%	FPIG (100%)	150%	200%	250%	300%	400%
1	\$5,745	\$11,490	\$17,235	\$22,980	\$28,725	\$34,470	\$45,960
2	\$7,755	\$15,510	\$23,265	\$31,020	\$38,775	\$46,530	\$62,040
3	\$9,765	\$19,530	\$29,295	\$39,060	\$48,825	\$58,590	\$78,120
4	\$11,775	\$23,550	\$35,325	\$47,100	\$58,875	\$70,650	\$94,200
5	\$13,785	\$27,570	\$41,355	\$55,140	\$68,925	\$82,710	\$110,280
6	\$15,795	\$31,590	\$47,385	\$63,180	\$78,975	\$94,770	\$126,360
7	\$17,805	\$35,610	\$53,415	\$71,220	\$89,025	\$106,830	\$142,440
8	\$19,815	\$39,630	\$59,445	\$79,260	\$99,075	\$118,890	\$158,520
Each add'nal person		\$4,020	\$6,030	\$8,040	\$10,050	\$11,889	\$16,080

Note: These guidelines became effective February 6, 2013 and are valid for all 48 contiguous states and the District of Columbia.

Source: BBC Research & Consulting from the U.S. Department of Health and Human Services.

## **County Income and Assistance Profiles**

Figure A-2 presents the distribution of household income by county and shows the percentage of households receiving Social Security Income, Supplemental Security Income (SSI), cash public assistance and food stamps/SNAP.

**Figure A-2.**  
**County Income and Assistance Profiles**

	Fairfield	Hartford	Litchfield	Middlesex	New Haven	New London	Tolland	Windham
<b>Total Population</b>	<b>925,899</b>	<b>894,705</b>	<b>188,789</b>	<b>166,043</b>	<b>861,113</b>	<b>273,502</b>	<b>152,507</b>	<b>118,151</b>
<b>Total Households</b>	<b>334,255</b>	<b>346,726</b>	<b>75,593</b>	<b>67,386</b>	<b>330,054</b>	<b>105,801</b>	<b>54,830</b>	<b>43,167</b>
<b>Total Household Income</b>								
Less than \$10,000	17,707	25,240	3,000	2,238	22,833	4,336	1,932	2,808
\$10,000 to \$14,999	12,595	18,280	2,849	2,499	18,224	4,682	1,023	2,098
\$15,000 to \$24,999	23,853	29,364	5,641	5,855	33,774	9,004	4,269	3,916
\$25,000 to \$34,999	22,905	28,891	5,750	4,129	29,431	10,012	4,290	3,299
\$35,000 to \$49,999	30,994	36,778	9,939	5,775	39,524	12,237	6,206	6,996
\$50,000 to \$74,999	50,583	60,867	14,314	13,379	53,862	18,316	9,619	8,202
\$75,000 to \$99,999	35,925	46,979	10,741	9,273	41,149	14,553	7,514	6,646
\$100,000 to \$149,999	55,960	55,047	14,580	12,747	51,118	18,720	11,696	6,502
\$150,000 to \$199,999	27,360	22,965	4,974	5,612	22,221	8,573	4,827	1,629
\$200,000 or more	56,373	22,315	3,805	5,879	17,918	5,368	3,454	1,071
Median household income	\$79,841	\$63,536	\$67,658	\$74,484	\$59,271	\$66,603	\$75,238	\$54,098
<b>Social Security</b>								
# of households with Social Security income	92,212	105,135	23,587	20,522	97,401	30,899	14,394	12,692
Mean Social Security income	\$19,306	\$17,361	\$19,351	\$18,654	\$17,316	\$18,317	\$19,684	\$18,330
<b>Supplemental Security Income (SSI)</b>								
# of households with SSI	10,596	17,239	2,453	1,667	16,680	5,679	1,746	2,122
Mean SSI income	\$9,376	\$9,472	\$10,550	\$9,183	\$9,513	\$8,856	\$9,058	\$8,646
<b>Cash Public Assistance Income</b>								
# of households with cash public assistance	9,069	12,938	1,236	1,156	12,278	3,147	1,212	1,719
Mean cash public assistance income	\$4,187	\$4,141	\$2,148	\$3,313	\$4,429	\$4,177	\$3,114	\$2,888
<b>Food Stamps/SNAP Benefits</b>								
# of households with Food Stamps/SNAP	30,898	51,090	5,216	3,691	49,350	12,957	2,492	7,370

Source: BBC Research & Consulting from 2012 American Community Survey.

## Endnotes

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- <sup>i</sup> Cancer prevalence source: [statecancerprofiles.cancer.gov](http://statecancerprofiles.cancer.gov) calculated from State Cancer Registries.
- <sup>ii</sup> Cachexia prevalence source: “*Cachexia: Prevalence and Impact in Medicine*,” Tan, Benjamin H.L. and Kenneth C.H. Fearon, *Current Opinion in Clinical Nutrition and Metabolic Care* (2008) 11:400-407.
- <sup>iii</sup> Crohn’s disease prevalence source: “*Recent Trends in the Prevalence of Crohn’s Disease and Ulcerative Colitis in a Commercially Insured U.S. Population*,” Kappleman, Michael D., Kristen R. Moore, Jeffery K. Allen, and Suzanne F. Cook, *Dig Dis Sci* (2013)58:519-525.
- <sup>iv</sup> Epilepsy prevalence source: “*The Descriptive Epidemiology of Epilepsy: A Review*,” Banerjee, Poonam Nina, David Filippi, and W. Allen Hauser, *Epilepsy Research* (2009): 85(1):31-45.
- <sup>v</sup> Glaucoma prevalence source: “*Prevalence of Cataract, Age-Related Macular Degeneration, and Open-Angle Glaucoma Among Adults 40 Years and Older in the United States*,” National Eye Institute, National Institutes of Health, *Archives of Ophthalmology*, (2004)Volume 122.
- <sup>vi</sup> HIV/AIDS prevalence source: “*HIV Surveillance Program, Total HIV Infection Cases by Sex, Race and Risk (1981-2011)*,” Connecticut Department of Public Health (2012).
- <sup>vii</sup> Multiple Sclerosis prevalence source: “*The Prevalence of Multiple Sclerosis in Three US Communities*,” Noonan, Curtis W., Dhelia M. Williamson, Judy P. Henry, Robert Indian, Sharon G. Lynch, John S. Neuberger, Randolph Schiffer, Janine Trottier, Laurie Wagner, and Ruth Ann Marie, *Preventing Chronic Disease* (2010) 7(1):1-8.
- <sup>viii</sup> Parkinson’s disease prevalence source: “*Geographic and Ethnic Variation in Parkinson Disease: A Population-Based Study of US Medicare Beneficiaries*,” Willis, Allison Wright, Bradley A. Evanoff, Min Lian, Susan R. Criswell, and Brad A. Racette, *Neuroepidemiology* (2010) 34:143-151.
- <sup>ix</sup> Posttraumatic Stress Disorder prevalence source: “*Lifetime prevalence and age-of-onset distributions of DSM-IV disorders in the National Comorbidity Survey Replication (NCS-R)*,” Kessler RC, PA Berglund, O Demler, R Jin, EE Walters, *Archives of General Psychiatry*, (2005) 62(6):593-602.
- <sup>x</sup> Prevalence for spinal cord injury: *Spinal Cord Injury Fact Sheet*, Centers for Disease Control, <http://www.cdc.gov/traumaticbraininjury/scifacts.html>



Tuesday October 15, 2013

Mr. Jason Nickerson  
Co-Owner and General Manager  
Greenbelt Management, LLC  
1189 Post Road, 3A  
Fairfield, CT 06824

Reference: Letter of Intent

Dear Mr. Nickerson,

MJ Freeway has created a fully integrated Point of Sale (POS), Inventory Control, Cultivation Management and Patient Management System precisely designed to serve state-approved Dispensary Facilities and Producers.

We have what we and many others believe to be the most advanced and sophisticated complete software solution for the medical marijuana industry. Our confidence in our product is buttressed by ample testimonials from customers.

This letter will confirm MJ Freeway's willingness and intent to enter into a formal agreement with Greenbelt Management, LLC to provide software solutions guaranteed to meet published State of Connecticut reporting, regulation, and compliance guidelines for medical marijuana dispensary facilities and producers in the event that your application is viewed favorably and you emerge with the requisite authorized license.

We appreciate your confidence in our company and services and wish you well in your efforts to secure a license. MJ Freeway is ready to enter into a services agreement with you immediately thereafter on terms already discussed.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Amy A Poinsett", with a stylized flourish at the end.

Amy A Poinsett  
Chief Executive Officer

The State of Connecticut's Department of Consumer Protection has issued draft regulations concerning the palliative use of marijuana. These regulations include significant requirements in the areas of operational policies and procedures, inventory control, patient recordkeeping, information security and patient education, among other topics. Below is information from MJ Freeway™ on how GramTracker™ and GrowTracker™ software meets each relevant section of regulations.

**Sec. 21a-408-34. Operation of dispensary facility**

- (a) No person may operate a dispensary facility without a dispensary facility license issued by the department.
- (b) A dispensary facility shall not dispense marijuana from, obtain marijuana from, or transfer marijuana to, a location outside of the state of Connecticut.
- (c) A dispensary facility shall not obtain, cultivate, deliver, transfer, transport, sell or dispense marijuana except:
  - (1) It may acquire marijuana from a producer; and
  - (2) It may dispense and sell marijuana to a qualifying patient or primary caregiver who is registered with the department pursuant to the Act and section 21a-408-6 of the Regulations of Connecticut State Agencies.

***MJ Freeway's sales records, vendor records, purchase orders, transfer records and transport manifests document the source and destination of all marijuana that is dispensed from or obtained by the dispensary facility. These records are all time and date stamped and tied to an individual user to ensure accountability. MJ Freeway's GramTracker™ batch tracking system allows a dispensary to keep detailed records of all movements of product, ensuring the dispensary's capability to ensure that both incoming and outgoing product are associated with legally permitted sources and destinations.***

- (d) No person at a dispensary facility shall provide marijuana samples or engage in marijuana compounding.

***MJ Freeway's inventory capabilities provide accuracy to the tenth of a gram, using integrated legal-for-trade scales. Any discrepancy in inventory levels is plainly visible in inventory and reconciliation reports, ensuring that dispensary facility managers have the ability to ensure that policies prohibiting the provision of samples or compounding are being upheld.***

- (f) Only a dispensary may dispense marijuana, and only a dispensary or dispensary technician may sell marijuana, to qualifying patients and primary caregivers who are registered with the department pursuant to the Act and section 21a-408-6 of the Regulations of Connecticut State Agencies. A dispensary technician may

assist, under the direct supervision of a dispensary, in the dispensing of marijuana.

(h) A dispensary facility shall not permit any person to enter the dispensary department unless:

(1) Such person is licensed or registered by the department pursuant to 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies;

(2) Such person's responsibilities necessitate access to the dispensary department and then for only as long as necessary to perform the person's job duties;

or

(3) Such person has a patient or caregiver registration certificate, in which case such person shall not be permitted behind the service counter or in other areas where marijuana is stored. 43

(i) All dispensary facility employees shall, at all times while at the dispensary facility, have their current dispensary license, dispensary technician registration or

dispensary facility employee registration available for inspection by the commissioner or the commissioner's authorized representative.

***MJ Freeway's GramTracker™ allows a dispensary to prevent sales and check-ins of patients without valid licenses, and also tracks which user within the database performs a sale, allowing a dispensary to track and ensure that all transactions take place between two legal parties.***

(n) A dispensary facility shall make publicly available the price of all marijuana products offered by the dispensary facility to prospective qualifying patients and primary caregivers. Such disclosure may include posting the information on the dispensary facility Internet web site

***MJ Freeway provides several methods for dispensary facilities to publicize their pricing, including through online menus and integration with locator services.***

(o) A dispensary facility shall provide information to qualifying patients and primary caregivers regarding the possession and use of marijuana. The dispensary facility manager shall submit all informational material to the commissioner for approval prior to being provided to qualifying patients and primary caregivers. Such informational material shall include information related to:

(1) Limitations on the right to possess and use marijuana pursuant to the Act and sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies;

(2) Safe techniques for proper use of marijuana and paraphernalia;

(3) Alternative methods and forms of consumption or inhalation by which one can use marijuana;



- (4) Signs and symptoms of substance abuse; and
- (5) Opportunities to participate in substance abuse programs.

***MJ Freeway provides the ability for dispensary facilities to provide patient educational information at the point of sale, and to capture a record of the date and time that such information was provided to the patient. Multiple pieces of educational material can be created and notes of which specific ones were provided can be captured in the patient purchase record.***

(q) All deliveries from producers shall be carried out under the direct supervision of a dispensary who shall be present to accept the delivery. Upon delivery, the marijuana shall immediately be placed in an approved safe or approved vault within the dispensary department where marijuana is stored.

***When purchase orders or transfers are received in MJ Freeway, the incoming product count and weight is captured. The date and time stamp, as well as the name of the person receiving the product is also captured. An inventory location for the received inventory is recorded as the product is checked in.***

#### **Sec. 21a-408-38. Rights and responsibilities of dispensaries**

(a) A dispensary, in good faith, may sell and dispense marijuana to any qualifying patient or primary caregiver that is registered with the department. Except as otherwise provided by sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies, the dispensary dispensing the marijuana shall include the date of dispensing and the dispensary's signature or initials on the dispensary facility's dispensing record log.

***MJ Freeway's sales records capture the date and time of each sale, the name of the dispensary making the sale, and attach that information to the patient record. This is maintained both as a log of daily sales, as well as a log of sales to the patient.***

(e) A dispensary may dispense a portion of a qualifying patient's one-month supply of marijuana. The dispensary may dispense the remaining portion of the one-month supply of marijuana at any time except that

no qualifying patient or primary caregiver shall receive more than a one-month supply of marijuana in a one-month period.

***MJ Freeway includes safeguards to monitor the weight of medicine on a particular order and compare that to the total weight dispensed to that patient over the previous one month. If an individual sale will exceed the remaining portion for a one-month supply, the dispensary is alerted and the sale is blocked.***

(g) A dispensary shall document a qualifying patient's self-assessment of the effects of marijuana in treating the qualifying patient's debilitating medical condition or the symptoms thereof. A dispensary facility shall maintain such documentation electronically for at least three years following the date the patient ceases to designate the dispensary facility and such documentation shall be made available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.

***MJ Freeway's SymptomTracker™ module provides a mechanism for the dispensary to review with the patient their symptoms and self-assess the effects of marijuana on those symptoms or conditions. This self-assessment is attached to the patient record. Self-assessments can be scheduled to ensure that dispensaries are communicating with their patients about symptoms and conditions on a regular basis.***

#### **Sec. 21a-408-39. Dispensaries to assign serial number and maintain records. Transfer of records to another dispensary facility**

(a) A dispensary shall assign and record a sequential serial number to each marijuana product dispensed to a patient and shall keep all dispensing records in numerical order in a suitable file, electronic file or ledger. The records shall indicate:

- (1) The date of dispensing;
- (2) The name and address of the certifying physician;
- (3) The name and address of the qualifying patient, or primary caregiver if applicable;
- (4) The initials of the dispensary who dispensed the marijuana; and
- (5) Whether a full or partial one-month supply of marijuana was dispensed.

(b) A dispensary facility shall maintain records created under this section and shall make such records available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.

(c) When a dispensary department closes temporarily or permanently, the dispensary facility shall, in the interest of public health, safety and convenience, make its complete dispensing records immediately available to a nearby dispensary facility and post a notice of this availability on the window or door of the closed dispensary facility. The dispensary facility shall simultaneously provide such notice to the commissioner.

***MJ Freeway assigns unique batch numbers to every strain, from every harvest. Furthermore, every package created from a batch of inventory is assigned a unique, non-repeatable, package/serial number. These serial numbers, once generated and assigned, cannot be changed.***

***MJ Freeway's sales records capture the date of dispensing, the recommending physician, and the quantity dispensed. This information is all attached to the record of the qualifying patient.***

***MJ Freeway saves, and allows exports of, all inventory and sales history. Also, an MJ Freeway client can request an archived copy of their site, which will allow all records to be passed on quickly and easily as described in (5)(c).***

#### **Sec. 21a-408-40. Labeling of marijuana products by dispensary**

(a) A dispensary shall not dispense marijuana that does not bear the producer label required pursuant to section 21a-408-56 of the Regulations of Connecticut State Agencies.

(b) A dispensary, or a dispensary technician under the direct supervision of the dispensary, shall completely and properly label all marijuana products dispensed with all required information as follows:

- (1) The serial number, as assigned by the dispensary facility;
- (2) The date of dispensing the marijuana;
- (3) The quantity of marijuana dispensed;
- (4) The name and registration certificate number of the qualifying patient and, where applicable, the primary caregiver;
- (5) The name of the certifying physician;
- (6) Such directions for use as may be included in the physician's written certification or otherwise provided by the physician;
- (7) Name of the dispensary;
- (8) Name and address of the dispensary facility;
- (9) Any cautionary statement as may be required by Connecticut state statute or regulation; and
- (10) A prominently printed expiration date based on the producer's recommended conditions of use and storage that can be read and understood by the ordinary individual.

(c) The expiration date required by this section shall be no later than the expiration date determined by the producer.

(d) No person except a dispensary, or a dispensary technician operating under the direct supervision of a dispensary, shall alter, deface or remove any label so affixed.

***MJ Freeway currently captures and retains all data described in the requirements above. Any specific label formatting or disclaimers required by the Department of Consumer Protection will be adhered to. MJ Freeway creates both inventory labels, which are applied to the product at the production facility, prior to sale, and patient labels, which include required patient information and are applied at the point of sale. MJ Freeway's 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-408-47. Dispensing error reporting. Quality assurance program**

(b) A dispensary facility shall include the following printed statement on the receipt or in the bag or other similar packaging in which marijuana is contained: "If you have a concern that an error may have occurred in the dispensing of your marijuana, you may contact the Department of Consumer Protection, Drug Control Division, by calling (Department of Consumer Protection telephone number authorized pursuant to section 21a-2 of the Connecticut General Statutes)." The dispensary facility shall print such statement in a size and style that allows it to be read without difficulty by patients.

*MJ Freeway provides dispensary facilities with the ability to provide this statement at the point of sale. It may be provided through an information sheet that prints upon completion of the sale and is then included in the bag, or it may be added to the receipt itself.*

**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.

*MJ Freeway maintains a highly redundant server architecture, with both hardware redundancy and data replication and backups. MJ Freeway's follows HIPAA security guidelines, which include maintaining stringent physical security of servers, maintaining access control restrictions to the data and servers, and protecting patient identifiable information through encryption.*

**Sec. 21a-408-50. Dispensary reporting into the prescription monitoring program**

(a) At least once per day, a dispensary shall transmit electronically to the Drug

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Control Division of the department the information set forth in the most recent edition of the Standard for Prescription Monitoring Programs established by the American Society for Automation in Pharmacy, a copy of which may be purchased from the American Society for Automation in Pharmacy on their Internet web site: [www.asapnet.org](http://www.asapnet.org).

(b) A dispensary shall transmit to the department, in a format approved by the department, the fields listed in this subsection, including, but not limited to, the following:

- (1) Drug Enforcement Administration Pharmacy number, which shall be populated by a number provided by the department;
- (2) Birth date;
- (3) Sex code;
- (4) Date order filled, which shall be the date marijuana is dispensed;
- (5) Order number, which shall be the serial number assigned to each marijuana product dispensed to a patient;
- (6) New-refill code;
- (7) Quantity;
- (8) Days supply;
- (9) National Drug Code number, which shall be provided by the department;
- (10) Drug Enforcement Administration Prescriber identification number;
- (11) Date order written, which shall be the date the written certification was issued;
- (12) Number of refills authorized;
- (13) Order origin code, which shall be provided by the department;
- (14) Patient last name;
- (15) Patient first name;
- (16) Patient street address;
- (17) State;
- (18) Payment code for either cash or third-party provider; and
- (19) Drug name, which shall be the brand name of the marijuana product.

(c) A dispensary shall transmit the information required pursuant to this section in such a manner as to insure the confidentiality of the information in compliance with all federal and Connecticut state statutes and regulations, including the federal Health Insurance Portability and Accountability Act of 1996, Public Law 104-191.

***MJ Freeway's GramTracker™ currently has the ability to capture all of items outlined above. Should the state provide the framework to allow it, MJ Freeway will happily construct an integration to report all required information directly to the state database as seamlessly and conveniently as possible.***

#### **Sec. 21a-408-52. Operation of production facility**

(b) A producer shall not:

- (1) Produce or manufacture marijuana in any place except its approved production facility;
- (2) Sell, deliver, transport or distribute marijuana from any place except its approved production facility;
- (3) Produce or manufacture marijuana for use outside of Connecticut;
- (4) Sell, deliver, transport or distribute marijuana to any place except a dispensary facility located in Connecticut;

***MJ Freeway's sales records, vendor records, purchase orders, transfer records and transport manifests document the source and destination of all marijuana that is dispensed from or obtained by the dispensary facility. These records are all time and date stamped and tied to an individual user to ensure accountability.***

#### **Sec. 21a-408-53. Minimum requirements for the storage and handling of marijuana by producers**

(c)(4) Document the chain of custody of all marijuana and marijuana products.

***MJ Freeway's seed-to-sale data management capabilities are specifically designed to capture the chain of custody of all marijuana products from creation of the plant, through cultivation, harvesting, processing, distribution, inventory and sale.***

(d)(1) Handling mandatory and voluntary recalls of marijuana products. Such process shall be adequate to deal with recalls due to any action initiated at the request of the commissioner and any voluntary action by the producer to remove defective or potentially defective marijuana products from the market or any action undertaken to promote public health and safety by replacing existing marijuana products with improved products or packaging;

***MJ Freeway's batch tracking information ties any finished product, all the way back to the original plant in came from. In addition, all sales of product from that batch can be identified. In the case of a product recall, simply reporting on the batch ID of the defective product would enable the dispensary facility to remove all product from that batch from their inventory and to contact all patients who purchased product from that batch.***

(d)(3) Ensuring that any outdated, damaged, deteriorated, misbranded, or adulterated marijuana is segregated from all other marijuana and destroyed. This procedure shall provide for written documentation of the marijuana disposition;

***MJ Freeway captures destruction of marijuana by recording an inventory adjustment, requiring that the reason code for the adjustment be entered to indicate destruction, giving the ability to enter a note with further information, and providing a time and date stamp, as well as identification of who entered the record. The destroyed product shows as a unique entry on inventory reports, enabling future reporting on destroyed product.***

#### **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.

***MJ Freeway's GrowTracker™ allows for detailed records of plant production, from seed to shipment, tracking strain/brand, harvest date and ingredients. Once harvested, useable product, useable byproduct, and waste can be tracked, and dealt with, independently. With static historical data and the Transport Manifest, chain of custody becomes traceable and unchangeable. MJ Freeway software 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-408-56. Packaging and labeling by producer**

(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;

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- (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.

***MJ Freeway captures all of the data outlined above and will meet any production labeling requirements specified by Connecticut. Any specific label formatting or disclaimers required by the Department of Consumer Protection will be adhered to. After harvest, the production facility will be able to track the conversion of finished flower to discrete, uniquely label, sellable packages. MJ Freeway creates both inventory labels, which are applied to the product at the production facility, prior to sale, and patient labels, which include required patient information and are applied at the point of sale. MJ Freeway's 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-408-58. Laboratory testing**

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(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.

Test	Specification
Alfatoxin B1	<20uG/KGofSubstance
Alfatoxin B2	<20uG/KGofSubstance
Alfatoxin O1	<20uG/KGofSubstance
Alfatoxin O2	<20uG/KGofSubstance
Ochratoxin A	<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.

***MJ Freeway's batch tracking and inventory location functionality supports the requirements above for product control prior to the completion of testing. Finished product that is not yet tested can easily be maintained as separate inventory from that which is already tested and available for packaging or further processing. Laboratory results can be attached to product entries once they have been sent to the producer. MJ Freeway's GramTracker™ test results module 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.

***MJ Freeway software 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.

***MJ Freeway currently provides a robust shipping manifest, which includes sending and receiving party information, transporter information including route traveled and auto description, and a detailed product listing. Any specific format prescribed by the commissioner will be created within MJ Freeway.***

#### **Sec. 21a-408-64. Disposal of marijuana**

(a) A dispensary, producer, laboratory, law enforcement or court official or the commissioner or the commissioner's authorized representative shall dispose of undesired, excess, unauthorized, obsolete, adulterated, misbranded or deteriorated marijuana in the following manner:

(1) By surrender without compensation of such marijuana to the commissioner or the commissioner's authorized representative; or

(2) By disposal in the presence of an authorized representative of the commissioner in such a manner as to render the marijuana non-recoverable.

(b) The person disposing of the marijuana shall maintain and make available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies a separate record of each such disposal indicating:

(1) The date and time of disposal;

(2) The manner of disposal;

(3) The brand name and quantity of marijuana disposed of; and

(4) The signatures of the persons disposing of the marijuana, the authorized representative of the commissioner and any other persons present during the disposal.

***MJ Freeway captures destruction of marijuana by recording an inventory adjustment, requiring that the reason code for the adjustment be entered to indicate destruction, giving the ability to enter a note with further information, and providing a time and date stamp, as well as identification of who entered the record. The destroyed product shows as a unique entry on inventory reports, enabling future reporting on destroyed product.***

#### **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
- (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.

***MJ Freeway's GramTracker™ provides 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.***

**Sec. 21a-408-69. Dispensary facility and producer records; furnishing of information; audits**

- (a) Each dispensary facility and producer shall maintain a complete set of all records necessary to fully show the business transactions related to marijuana for a period of the current tax year and the three immediately prior tax years, all of which shall be made available in accordance with section 21a-408-70 of the Regulations of Connecticut State Agencies.
- (b) The commissioner may require any licensee or registrant to furnish such information as the commissioner considers necessary for the proper administration of the Act and sections 21a-408-1 to 21a-408-70, inclusive, of the



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Regulations of Connecticut State Agencies, and may require an audit of the business of any dispensary facility or producer and the expense thereof shall be paid by such dispensary facility or producer.

***MJ Freeway captures all historical data, within GramTracker™ and GrowTracker™, in easily viewable and exportable reports. 'READ ONLY' access can also be granted to the software, if needed.***

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REVISION LOG

Version	Revision Date	Description	Author	Approval
1.0	11/1/13	Draft.	DRC	GM – 11/1/13

## SECURITY PLAN SUMMARY

Greenbelt Management's security plan details extensive security provisions in compliance with those published by the Department. Measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at any Greenbelt Management facility are addressed throughout. Access to company facilities is limited to employees and those persons allowed access by Department regulations. The policies established here will be strictly enforced, as Greenbelt Management operates in a high risk security environment.

The Greenbelt Management will have an adequate security system to prevent and detect diversion, theft, or loss of marijuana or unauthorized intrusion. The facility will prominently display security system features and signage. Commercial grade equipment will be utilized, including alarm systems in compliance with Department requirements and an adequate failure notification system. Video cameras will be installed in all areas that may contain marijuana, at all points of entry and exit and any parking lot, and will be angled to allow for the capture of clear and certain identification of any person entering or exiting the facility or area. Commercial metal halide fixtures sufficient to facilitate surveillance will be used to light the exterior of each facility and it is ensured that trees, bushes, and other foliage outside of the facility will not allow for a person or persons to conceal themselves from sight.

Procedures contained here include measures to aid the development of strong partnerships with local law enforcement agencies, prevent unwanted individuals from remaining on premises and ensure compliance with Department guidelines for marijuana disposal. Information Technology security measures are included with procedures for maintaining confidentiality as required by law.

An accurate security site plan must be maintained, and plans for annual security system auditing are addressed. It is established that limited access areas are accessible only to specifically authorized personnel, and that all finished marijuana will be stored in a secure, locked safe or vault and in such a manner as to prevent diversion, theft, and loss.

## PURPOSE

Greenbelt Management operates in a high security risk environment. The safety and security of our patients and staff is our primary concern. Internal and external security threats to the company exist relating to physical, cyber, and procedural security for all facilities and operations. It is the responsibility of every employee to aid in the security of the company through prevention, awareness, reporting, and responsible incident management. When this plan references other sections or documents, it is important to review them in detail.

## EMERGENCY SECURITY CONTACTS

Police – 911 or Middletown Police - (860) 347-2541  
General manager – Matthew or Jason Nickerson  
On-site security provider – Kratos Security  
Alarm system provider – TBD  
Surveillance system provider – Kratos Security

## REGULATORY – SECURITY

Sec. 21a-408-61. Security requirements for producers

- (a) producer 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 production facility accessible only to specifically authorized employees, 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 employees;
  - (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 employees; and
  - (8) Keep the production facility securely locked and protected from entry at all times.
- (b) If a production facility presents special security issues, such as extremely large stock of marijuana, exposed handling, unusual vulnerability to diversion, theft or loss, the commissioner may require additional safeguards such as supervised watchman service.
- (c) If a loss, theft, or diversion of marijuana has occurred from a production facility, the commissioner shall determine the appropriate storage and security requirements for all marijuana in such production facility, and may require additional safeguards to ensure the security of the marijuana.
- (d) Any marijuana not stored in compliance with sections 21a-408-1 to 21a-408- 70, inclusive, of the Regulations of Connecticut State Agencies, or at a location other than that for which the producer license was issued, shall be subject to seizure in accordance with section 21a-96 of the Connecticut General Statutes.
- (e) Any producer whose license is revoked or not renewed shall dispose of its entire stock of marijuana under conditions approved by the department.
- (f) If a producer has provided other safeguards, which can be regarded in total as an adequate substitute for some element of protection required of such producer, such added protection may be taken into account by the commissioner in evaluating overall required security measures.
- (g) No person shall be allowed access to any area within a production facility containing marijuana except laboratory employees and production facility employees whose responsibilities necessitate access to the area of the production facility containing marijuana and then for only as long as necessary to perform the person's job duties.
- (h) Any area of a production facility containing marijuana, including a room with an approved safe or approved vault, shall have a sign posted at all entry ways, which shall be a minimum of twelve inches in height and twelve inches in width and shall state: "Do Not Enter - Limited Access Area – Access Limited to Authorized Employees Only" in lettering no smaller than one-half inch in height.
- (i) Notwithstanding the requirements of sections 21a-408-1 to 21a-408-70, inclusive, of the Regulations of Connecticut State Agencies, members of the department, local law enforcement or other federal, state of Connecticut or local government officials may enter any area of a production facility if necessary to perform their governmental duties.

Sec. 21a-408-62. Security alarm systems; minimum requirements for dispensary facilities and production facilities

- (a) All dispensary facilities and production facilities shall have an adequate security system to prevent and detect diversion, theft or loss of marijuana utilizing commercial grade equipment, which shall, at a minimum, include:
- (1) A perimeter alarm;
  - (2) Motion detector;
  - (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 dispensary facility or production facility shall direct cameras 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 dispensary facility or production facility shall angle cameras so as to allow for the capture of clear and certain identification of any person entering or exiting the facility;
  - (4) Twenty-four hour recordings from all video cameras, which the dispensary facility or production facility shall make available for immediate viewing by the commissioner or the commissioner's authorized representative upon request and shall be retained for at least thirty days. If a dispensary facility permittee or producer is aware of a pending criminal, civil or administrative investigation or legal proceeding for which a recording may contain relevant information, the dispensary facility permittee or producer shall retain an unaltered copy of the recording until the investigation or proceeding is closed or the entity conducting the investigation or proceeding notifies the dispensary facility manager or producer that it is not necessary to retain the recording;
  - (5) Duress Alarm, which for purposes of this subsection shall mean a silent Security Alarm System signal generated by the entry of a designated code into an Arming Station in order to signal that the Alarm User is being forced to turn off the system;
  - (6) Panic Alarm, which for purposes of this subsection shall mean an audible Security Alarm System signal generated by the manual activation of a device intended to signal a life threatening or emergency situation requiring a law enforcement response;
  - (7) Holdup Alarm, which for purposes of this subsection shall mean a silent alarm signal generated by the manual activation of a device intended to signal a robbery in progress;
  - (8) Automatic Voice Dialer, which for purposes of this subsection shall mean any electrical, electronic, mechanical, or other device capable of being programmed to send a prerecorded voice message, when activated, over a telephone line, radio or other communication system, to a law enforcement, public safety or emergency services agency requesting dispatch;
  - (9) A failure notification system that provides an audible, text or visual notification of any failure in the surveillance system. The failure notification system shall provide an alert to the dispensary facility permittee or producer within five minutes of the failure, either by telephone, email, or text message;
  - (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) date and time stamp embedded on all recordings. The date and time shall be synchronized and set correctly and shall not significantly obscure the picture; and
  - (12) The ability to remain operational during a power outage.
- (b) A dispensary facility or a production facility shall maintain all security system equipment and recordings in a secure location so as to prevent theft, loss, destruction or alterations.
- (c) In addition to the requirements listed in subsection (a) of this section, each production facility shall have a back-up alarm system approved by the commissioner that shall detect unauthorized entry during times

- when no employees are present at the facility and that shall be provided by a company supplying commercial grade equipment, which shall not be the same company supplying the primary security system.
- (d) A dispensary facility or a producer facility shall limit access to surveillance areas to persons that are essential to surveillance operations, law enforcement agencies, security system service employees, the commissioner or the commissioner's authorized representative, and others when approved by the commissioner. A dispensary facility and producer shall make available a current list of authorized employees and service employees that have access to the surveillance room to the commissioner or the commissioner's authorized representative upon request. A dispensary facility and producer shall keep all on-site surveillance rooms locked and shall not use such rooms for any other function.
  - (e) dispensary facility and producer shall keep the outside perimeter of the dispensary facility and production facility premises well-lit.
  - (f) All video recording shall allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif. Exported video shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place. Exported video shall also have the ability to be saved in an industry standard file format that can be played on a standard computer operating system. A dispensary facility and producer shall erase all recordings prior to disposal or sale.
  - (g) dispensary facility and producer shall keep all security equipment in good- working order and shall test such equipment no less than two times per year.

## GENERAL - SECURITY

General – security policies.

Greenbelt Management must implement sufficient security measures to deter and prevent unauthorized entrance into areas containing marijuana and theft of marijuana at any Greenbelt Management facility. The general manager, in coordination with the company's security advisors, is responsible for the development and maintenance of the **Security Plan**. Any Department security directives must be incorporated into the plan. Any changes must be documented, distributed to all employee, and re-training must be scheduled as soon as possible if required.

Communication with law enforcement.

The general manager must maintain a list of non-emergency police department contacts for each facility. The general manager must maintain regular communication with each contact advising of any changes in security procedures. Greenbelt Management aims to develop strong partnerships with the local law enforcement agencies.

The general manager shall engage these agencies to support the company's security mission through:

- (1) Collaborative training and exercises;
- (2) Observation patrols;
- (3) Rapid response to incidents; and
- (4) Proactive meetings.

Alternative security measures.

If Greenbelt Management cannot meet one of the Department security provisions, the general manger must provide other adequate substitute safeguards. The general manager must ensure all security procedures are documented and any alternative measures are noted.

#### Security training.

All employees must receive adequate security training in accordance with the **Training Plan**. Department managers are responsible for the ongoing security training in daily operations. Employees are required to report any suspicious activity or security concerns to their supervisor immediately.

#### Facility access and limited access areas.

- (1) Only registered qualifying patients, personal caregivers, employee, officials in the course of their duties, outside vendors, contractors, and visitors, are allowed access to any Greenbelt Management facility. Staff may not allow any other person on site. Any person refusing to leave the premises should be considered Incident and handled in accordance with Greenbelt Management's **Incident Response Plan**.
- (2) Employees must display identification at all times while working. Employees must report a lost badge to their supervisor immediately.
- (3) Visitors, including outside vendors and consultants necessary for operations, are allowed in accordance with the **Facilities and General Operations Plan**. They must obtain a visitor identification badge prior to entering a limited access area, and will be escorted at all times by an employee who is authorized to enter the limited access area. The visitor identification badge must be visibly displayed at all times while the visitor is in any limited access area. All visitors must be logged in and out, and that log will be available for inspection by the Department at all times. All visitor identification badges will be returned to the Greenbelt Management upon exit.
- (4) Only authorized employees may access limited access areas. The general manager is responsible for assigning and recording access rights. Access shall be restricted to essential employees only.
- (5) All doors without biometric or electronic access control systems must be re-coded or re-keyed annually and following any involuntary termination.

#### Product security.

- (1) All unusable and excess marijuana must be disposed in accordance with Greenbelt Management's **Inventory Management, and Waste Disposal Plan** and **Anti-Diversion Plan**.
- (2) All finished marijuana must be stored and secured in accordance with Storage and Transportation procedures. Storage must be secured and locked at all times not in use.
- (3) Any occurrence of diversion, theft, or loss of marijuana must be handled in accordance with Greenbelt Management's **Incident Response Plan**.

#### Facility security.

- (1) The general manager shall ensure all locks and security equipment remain in good working order.
- (2) Facility employees are responsible for security and must secure keys, access control cards, and security codes at all times. Employees may not provide access through any means to any other employee. Only managers may grant temporary access to any employee or visitor.
- (3) The general manager must ensure that the interior and exterior areas of all facilities remain sufficiently lit and clear of obstructions for surveillance purposes.

#### Surveillance areas.

- (1) Access to surveillance areas must be limited by the general manager to:
  - (a) Persons that are essential to surveillance operations;
  - (b) Law enforcement authorities acting within their lawful jurisdiction;
  - (c) Security system service personnel; and
  - (d) Department officials.

- (2) On-site surveillance rooms must remain locked and shall not be used for any other function.
- (3) A current list of authorized employees and service personnel that have access to the surveillance room must be maintained by the general manager and available to the Department upon request.

Reporting required.

All Greenbelt Management employees are required to immediately report any of the following incidents to the general manager. The general manager must report such incidents to law enforcement and the Department in accordance with Greenbelt Management's **Recordkeeping, Reporting, and Notifications Plan**.

- (1) An alarm activation or other event that requires response by public safety personnel;
- (2) The failure of any security alarm system due to a loss of electrical power or mechanical malfunction that is expected to last longer than eight hours;
- (3) Discrepancies identified during inventory, diversion, theft, loss, and any criminal action involving the Greenbelt Management or an employee;
- (4) Unauthorized destruction of marijuana;
- (5) Any loss or unauthorized alteration of records related to marijuana, registered qualifying patients, personal caregivers, or employee; and
- (6) Any other breach of security.

Security advisors required.

The general manager shall approve security providers and advisors. The general manager shall utilize these security companies to ensure compliance with all Department equipment provisions.

Equipment to be maintained.

The general manager must schedule and oversee all required maintenance of security equipment in accordance with manufacturer recommendations. Any equipment failure identified must be corrected as soon as possible. All security equipment shall be in good working order and shall be inspected and tested at regular intervals, not to exceed 30 calendar days from the previous inspection and test.

Annual security system audit required.

The general manager must, on an annual basis, obtain a security system audit by a vendor approved by the Department. If the audit identifies concerns related to the Greenbelt Management's security system, the general manager must also submit a plan to mitigate those concerns within 10 business days of submitting the audit.

## ACCESS CONTROL PLAN

Issuing authority.

Facility keys, alarm codes (AC), and electronic access control cards (EACC) may be issued by the following individuals.

- (1) General manager.
- (2) Human resource manager.
- (3) Department managers.

Emergency access.

Only in an emergency may a key, AC, or EACC be issued by the maintenance manager. When a key is issued under these circumstances, the maintenance manager must notify the general manager as soon as possible.

Access control policies.

- (1) Demonstration of need required. Access will be given only to areas where need can be demonstrated. Issuance must be recorded by the issuing individual in the [Facility Key, Alarm Code, and Electronic Access Control Card Log](#).
- (2) Color identification. EACC cards are color coded based on access rights to control areas (compartment areas).
- (3) Keys, AC, and EACC must be protected. Keys, AC, and EACC may not be loaned and should not be left unattended. All keys issued on a "permanent" basis should be retained in the possession of the employee to whom issued. Keys, ACs, and EACCs may not be transferred directly from one employee to another. Avoid the practice of leaving keys on desks, counter tops, etc., or loaning to others.
- (4) Lost/stolen keys. Any employee losing a key, AC, or EACC must report the loss to his or her department manager immediately, who will then report the loss to the general manager. The general manager along with the security manager will make a determination as to whether the system has been compromised and re-keying, re-coring, or re-coding.
- (5) Duplicated keys. It is against Greenbelt Management policy to duplicate keys.

Issuance procedures.

To maintain a secure facility, specific issuance procedures shall be followed:

- (1) Temporary key, AC, and EACC issuance.
  - (a) Temporary key, AC, and EACC issuance shall be for a period of twenty-four hours or less.
  - (b) Any authorized individual will be permitted to check out a key on a temporary basis. The department manager shall grant authorization in writing.
  - (c) The individual receiving a temporary key shall provide photo identification at the time of key issuance, upon request. Keys checked out on a temporary basis shall be returned within the twenty-hour period.
  - (d) If the individual needs the key for a longer period of time, the key will be checked in and subsequently checked out again.
- (2) Temporary-loan.
  - (a) Department registered vendors and contractors may be authorized to have temporary-loan keys, ACs, and EACC.
  - (b) The general manager may authorize in writing the use of temporary loan keys in the [Facility Key, Alarm Code, and Electronic Access Control Card Log](#).
  - (c) Vendors/Contractors will acknowledge all keys received and report all lost or stolen keys immediately.
  - (d) Vendor/Contractor will return all keys within five days of termination of work. If keys are not returned within five days of project completion and it is determined a re-core is necessary, it shall be at the vendor/contractor's expense.
- (3) Permanent issuance.
  - (a) Permanent keys, ACs, and EACCs are issued to employees for the purpose of allowing the employee to access the areas in which they are regularly assigned duties.
  - (b) A record of all issuance must be kept in the [Facility Key, Alarm Code, and Electronic Access Control Card Log](#) and maintained by general manager.
  - (c) New employees will be issued keys for their work needs as indicated by the job description.
  - (d) Keys, ACs, and EACCs shall be issued to new employees by the general manager, human resource manager, or department manager.



Key return procedures.

When employment with the Greenbelt Management has been terminated, all keys will be returned and noted in the department manager report. Responsibility for collecting the key(s) and EACC(s) and cancelling the AC shall rest with the manager terminating employee. Failure on the part of a manager to collect key(s) and EACC(s) from terminating employees may require a key core change.

Administrative procedures.

The general manager and maintenance manager will oversee the management of the keying and coding systems of the Greenbelt Management. The design of the Greenbelt Management keying and coding system recognizes five control areas including: Administration, Work Area, Vegetative, Flowering, Processing, Manufacturing, Product Storage, Vault all with multiple levels of access. All keys, ACs, and EACCs will be color coded based on access rights, recorded and tracked in the [Facility Key, Alarm Code, and Electronic Access Control Card Log](#) by the general manager with the following information:

- (1) Employee name
- (2) Employee number
- (3) Identification
- (4) Date issued
- (5) Term of issuance
- (6) Date to be returned
- (7) Signature

## ROBBERY PREVENTION MEASURES

Each Greenbelt Management facility and transportation vehicle is a high value target for burglars and robbers. A robbery in progress is an Incident and must be handled in accordance with Greenbelt Management's **Emergency and Incident Response Plan**. The most effective way to ensure the safety and security of Greenbelt Management employees and patients is utilizing prevention strategies. All employee are required to have a good working knowledge of this **Security Plan** and to implement prevention measures into daily activities. Transportation of marijuana must be performed in accordance with transportation procedures found in the **Product Storage and Transportation Plan**.

General prevention measures.

- (1) Only main facility entrances may be used for access to the facility. Auxiliary doors may only open from the inside of the facility and be used in case of emergency.
- (2) Storage rooms should be secured with a lock that can be opened from the inside so that employees are not locked inside during an Incident.
- (3) Department managers shall vary employee lunch and break schedules to ensure maximum coverage.
- (4) Employees should be trained to greet every visitor to a facility immediately and look each visitor directly in the eyes noting any nervousness or strange behavior in the visitor.
- (5) Limited access areas must be cleaned regularly to remove old fingerprints. Oil or wax- based cleaners must not be used.

Opening and closing procedures.

- (1) Two employees are required for opening, closing, and operation of all facilities.
- (2) An employee must inspect the business for forcible entry before entering the business and survey the premises before admitting others.

- (3) Security equipment must be inspected after opening and prior to closing to ensure the necessary surveillance of all operating activities.
- (4) At closing, employees must survey the premises for someone hiding in the business, near the building entrance, or parking lot.
- (5) At closing, one employee must enter the parking lot first while the other watches them enter their vehicle before entering their vehicle.

Suspicious activities.

Every employee is responsible for reporting suspicious activities and persons to the department manager.

Department managers shall notify law enforcement when a potential risk is identified. Should the person leave before the officer's arrival, note the time to retrieve surveillance records, record a description of the suspect, and their vehicle for possible police use. Examples of suspicious activity could involve coworkers, patients, caregivers, vendors, or unknown persons and include:

- (1) Persons monitoring business operations.
- (2) Persons asking about closing times, volume of business, the amount of money on hand, etc.
- (3) Persons who appear to just loiter in the area checking the business layout and operations.
- (4) Persons who may be waiting for a lull in activity and fewer customers.

Cash management.

- (1) Each employee handling cash must be trained by the general manager in the types of related incidents related to cash and is required to handle cash in accordance with the **Sales Plan**.
- (2) The general manager is responsible for the development and implementation of cash management procedures.
- (3) Cash must be secured in a biometric money safe separate from marijuana product.

Panic alarm systems.

- (1) Each facility is equipped with a silent panic alarm system.
- (2) Employees must be trained by the department manager on the panic alarm system including the location of fixed alarms, the appropriate use of personal alarms, and accidental activation procedures.
- (3) A minimum of two employees at each facility must carry a personal silent alarm with them while on-site.

## INFORMATION TECHNOLOGY SECURITY

Information technology security advisor required.

The general manager shall employ the services of an information technology (IT) manager or contract a firm to ensure the security of Greenbelt Management's hardware, software, data, and communications networks. The information technology manager is responsible for all IT maintenance including:

- (1) Software registration;
- (2) Security patches;
- (3) Malicious software prevention;
- (4) Account management;
- (5) Security status and network access monitoring;
- (6) Disposal and redeployment;
- (7) Employee IT security training; and

(8) Vulnerability assessments.

Password requirements.

All employee passwords for software and network access must be changed every six months. The information technology manager shall ensure system require password changes.

Protected information.

Access to protected information must be restricted to essential personnel only. Examples of protected information include:

- (1) Security and cash management procedures.
- (2) Asset and inventory lists.
- (3) Network data.
- (4) Floor plans of critical areas.
- (5) Password and code records.
- (6) Sales records.
- (7) Employee records.

Incident reporting and response.

The information technology manager is required to identify cyber security incidents. Incidents include natural disasters impacting technology infrastructure and unauthorized network access exposing protected information. Incidents shall be handled in accordance with Greenbelt Management's Incident Response Plan.

## FACILITY DESIGN AND CONSTRUCTION

Description of the facility.

The cultivation facility is on the second level of a multi-story building, with only the front and rear walls exposed to the exterior. The construction of the exterior walls of the dispensary are comprised of masonry units. The floor is slab on grade concrete, while the structure above is also concrete, making for a very secure exterior perimeter. Access is limited to the facility through two access points – the main entrance with a secure holding area and an access controlled lift for materials and equipment.

Access doors.

All doors must be 18-gauge hollow metal with commercial-grade I, non-residential locks. Biometric locks will be utilized in all limited access areas. All other areas will utilize electronic access control cards. Additionally, exterior locks and limited access area entries must be equipped with electric strike and biometric access hardware and be automatically locking.

Reception area.

The first area of entry is a waiting room that limits access to the rest of the space. The wall separating this room and the reception area must be lined with a Kevlar panel. The receptionist window within this wall must be comprised of a bullet-resistant material.

Security equipment visibility.

Security equipment and signage indicating security cameras shall be prominently displayed on the interior and exterior of the premises.

Panic alarms.

Fixed panic alarms are located in areas where incidents are likely to take place including reception areas, production and manufacturing areas, storage rooms and staging areas. Staff must wear panic alarms while working the facility.

Interior signage.

All limited access areas within the dispensary must be clearly identified with a sign no smaller than 12" x 12" which states: "Do Not Enter – Limited Access Area – Access Limited to Authorized Personnel Only" in lettering no smaller than 1 inch in height. Each facility must prominently display security system and time-lock safe notification signage.

High risk areas.

Facilities will employ mechanisms that permit employees to have a secure view of their surroundings whenever possible including:

- (1) Convex mirrors;
- (2) Elevated vantage points; and
- (3) Strategic placement of product storage, staging, and production areas.

Lighting.

- (1) Timed delay switches must be used to turn off interior and exterior lights which cannot remain lit after staff has left the facility.
- (2) The exterior of each Greenbelt Management facility is lit by commercial metal halide fixtures sufficient to facilitate surveillance.

Product storage.

All finished medical marijuana products must be stored and secured in a U.L. TL-30 rated safe equipped with a U.L. Group 1 type mechanical lock or in vault storage. All in-process marijuana must be securely stored under surveillance at all times.

Exterior maintenance.

In accordance with the **Facilities and General Operations Plan**, the exterior landscaping of the facility shall not allow for any concealment near the facility. Trees should be maintained to have at least an eight-foot canopy. Ground plantings should be kept trimmed to a height no greater than two feet.

## SECURITY EQUIPMENT

Security equipment required.

The general manager must ensure an adequate security system at all facilities to prevent and detect diversion, theft, or loss of marijuana or unauthorized intrusion, utilizing commercial grade equipment, which shall, at a minimum, include:

- (1) A perimeter alarm on all entry points and perimeter windows.
- (2) A failure notification system that provides an audible, text, or visual notification of any failure in the surveillance system. The failure notification system shall provide an alert to designated employees of Greenbelt Management within five minutes after the failure, either by telephone, email, or text message.
- (3) A duress alarm, panic alarm, or holdup alarm connected to a monitoring company.

- (4) Video cameras in all areas that may contain marijuana, at all points of entry and exit, and in any parking lot and cameras, at a minimum:
  - (a) Must be appropriate for the normal lighting conditions of the area under surveillance;
  - (b) Directed at all safes, vaults, and areas where marijuana is cultivated, harvested, processed, prepared, stored, handled, or dispensed;
  - (c) Able to remain operational during a power outage for a minimum of 24 hours; and
  - (d) Angled so as to allow for the capture of clear and certain identification of any person entering or exiting the facility or area.
- (5) Twenty-four hour recordings from all video cameras must be:
  - (a) Available for immediate viewing by the Department upon request;
  - (b) Retained for at least 180 calendar days; and
  - (c) Recordings shall not be destroyed or altered, and shall be retained as long as necessary if the company is aware of a pending criminal, civil, or administrative investigation, or legal proceeding for which the recording may contain relevant information;
  - (d) Able to immediately produce a clear, color, still photo (live or recorded);
  - (e) Provide a date and time stamp embedded on all recordings. The date and time shall be synchronized and set correctly and shall not significantly obscure the picture; and
  - (f) Able to remain operational during a power outage for a minimum of 24 hours; and
- (6) Records must allow for the exporting of still images in an industry standard image format, including .jpg, .bmp, and .gif that at a minimum:
  - (a) Shall have the ability to be archived in a proprietary format that ensures authentication of the video and guarantees that no alteration of the recorded image has taken place; and
  - (b) Have the ability to be saved in an industry standard file format that can be played on a standard computer operating system.
- (7) All recordings shall be erased or destroyed prior to disposal.

Back-up alarm required [if required].

The general manager is responsible for the maintenance of a back-up alarm system, with all capabilities of the primary system, provided by a company supplying commercial grade equipment, which shall not be the same company supplying the primary security system.


Equipment and recordings must be secured.

The general manager shall ensure all security system equipment and recordings are maintained in a secure location so as to prevent theft, loss, destruction, and alterations.

EXHIBIT: FACILITY KEY, ALARM CODE, AND ELECTRONIC ACCESS CONTROL CARD LOG

\*This log should be completed [online](#).

## FACILITY KEY, ALARM CODE, AND ELECTRONIC ACCESS CONTROL CARD LOG

Issue Date:  
 


Issuing Manager:

Issued To:

Attach copy of the individual's identification or Department registration card.

Access Type Issued:  
 Key  
 Electronic Access Control Card  
 Access Security Code

Type of Access:  
 Permanent  
 Loan  
 Temporary  
 Other

Date to be Returned:  
 

Reason for Issuance:  
 New Employee  
 Replacement  
 Temporary/Loaner  
 Other

Notes:

Signature of Issuer:

Signature of Recipient

# VISITOR LOG

Date:

Visitor Name:

Company/Organization (If applicable):

Attach photocopy of identification document

Select File

Visit Location:

Badge Number:

Time In:

Time Out:

Purpose of Visit:

Comments:

Manager Signature

DRAFT



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1.0	11/1/13	Draft.	DRC	GM – 11/1/13

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## IDENTIFICATION BADGE AND VISITOR POLICIES SUMMARY

Greenbelt Management Identification Badge and Visitor Policies include security measures that will deter and prevent unauthorized entrance and access to the medical marijuana facility. Persons with authorized access to facilities and designated limited access areas are clearly defined. The policies include restrictive access policies in compliance with state law and Department regulations.

Security measures to protect the premises and employees include the identification badge policies and procedures, which will enhance the safety of Greenbelt Management's human, physical, and financial assets. Badge issuance authority is assigned herein, and it is established that each employee, contractor and visitor is responsible for the safekeeping of his or her badge. Types and colors of badges are defined, along with provisions for lost or stolen badges, temporary badges, badge placement and display devices. Employees are issued color coded facility access identification badges based on access rights.

The visitor policy outlines procedures for visitor approval and recordkeeping. All visitors will be logged in and out, and a visitor log will be available for inspection by the Department at all times. All outside vendors, contractors, and visitors will obtain an identification badge prior to entering a limited access area, and will be escorted at all times by an employee authorized to enter the limited access area. Employees are required to immediately report security breaches and incidents of non-compliance. Unauthorized visitors are prohibited, except for those Department representatives and other designated officials acting in accordance with state law and Department regulations.

## IDENTIFICATION BADGE AND VISITOR PLAN

Sec. 21a-408-53. Minimum requirements for the storage and handling of marijuana by producers  
(g)(1) All persons who are not production facility employees, but who are permitted on the premises of a production facility pursuant to subsection (f)(1) or (2) of this section, shall obtain a visitor identification badge from a production facility employee, prior to entering the production facility. A production facility employee shall escort and monitor visitors at all times. A visitor shall visibly display the visitor identification badge at all times the visitor is in the production facility. A visitor shall return the visitor identification badge to a production facility employee upon exiting the production facility.

## EMPLOYEE, CONTRACTOR, AND VISITOR IDENTIFICATION BADGES

Identification badge policy.

The purpose of the identification badge policies and procedures are to enhance the security and safety of Greenbelt Management's employees, patients, physical, and financial assets. Each employee, contractor, and visitor is responsible for the safekeeping of his or her badge.

Types of badges.

- (1) Employees are issued color-coded identification badges which represent their access rights.
- (2) Temporary identification badges which serve as a temporary replacement identification for an employee who has reported a lost or stolen badge.
- (3) Contractors must be issued a contractor badge.
- (4) Visitors must be issued a visitor badge.

Issuance authority.

Employee registration cards are issued by the Department in accordance with policies and procedures found in the **Department Registration Plan**. The general manager or department manager must issue a contractor badge. The general manager, a department manager, or their designee must issue a visitor badge and record the issuance in the [Identification Badge Issuance Log](#).

## VISITOR POLICY

Visitor restrictions.

Only employees, Department representatives, law enforcement and other officials acting in the course of their duties, and Department authorized and necessary outside vendors, contractors, and may access any company facility. Any unauthorized person must be denied access to any company facility. Contact law enforcement as necessary to remove individuals from the premises.

No unannounced visitors.

It is Greenbelt Management policy to prohibit any unannounced visitors at any company facility. The exception to this rule covers all Department representatives and other designated officials that may conduct both announced and unannounced visits to the facility in accordance with the **Compliance and Audit Plan**.

General manager approval required.

The general manager must approve all visitors, except as noted above.

Visitor log and identification badge.

The general manager or a department manager must approve by signature all visitors to any Greenbelt Management facility. An employee may approve a visitor who is escorting a patient to the dispensary facility. The approving individual must log the visitor in and out on the [Visitor Log](#), issue an identification badge, and record the issuance on the [Identification Badge Issuance Log](#) if the badge will be retained for over twenty-four hours.

Identification required.

A copy of identification (driver's license, official badge, etc.) for each visitor must be obtained and kept with the [Visitor Log](#). A visitor identification badge must be issued to a visitor and clearly displayed by the visitor prior to entering any limited access area. The visitor badge must be returned to Greenbelt Management upon exit.

Visitors must be accompanied.

All visitors must be accompanied by a manager authorized employee or dispensary at all times in limited access areas.

Restricted access areas.

The general manager oversees access to the safe room and marijuana storage, which must be restricted to key employees and controlled by biometric locks. Contractors and visitors requiring access must be escorted by the general manager of his or her designee.

Department authorized.

Employees may allow Department representatives access to the facility at any time without prior authorization, but must record any such visit on the [Visitor Log](#) and notify the general manager immediately upon their arrival.

Audit schedule.

The general manager must perform quarterly audits to ensure compliance with this policy in accordance with the **Compliance and Audit Plan**.

## EMPLOYEE BADGES

Employees of Greenbelt Management.

- (1) All employees must wear their identification card with appropriate color coding when entering limited access areas of any Greenbelt Management facility.
- (2) The badge must be worn above the waist and be visible at all times to others while in Greenbelt Management facilities.
- (3) While performing work in other areas, employees are required to have their badges readily available. Display practices may be modified by the general manager for special work conditions.
- (4) Only Greenbelt Management issued badge display devices (lapel/pocket clips, armbands and lanyards) are allowed.

Temporary badge.

Any employee who forgets his or her identification should immediately the department manager to obtain a temporary badge.

Lost or stolen badge.

Any employee who misplaces, loses, or has their identification stolen should immediately contact the department manager who must notify the security manager and the Department as required in the **Department Registration Plan**.

Identification of badge holders.

Any person, including employees, not wearing the proper identification badge in a limited access area must be questioned by other employees as a condition of employment.

Limiting access to others.

When entering any access-controlled area, employees must not allow entry of another person unless the individual displays a proper identification badge.

Reporting of non-compliance required.

Non-compliance with these policies or any breach of Greenbelt Management security procedures should be reported immediately to the department manager or general manager.

No offsite display.

Badges should not be worn off-site unless for official business.

Compliance required.

Violation of any of these policies may lead to disciplinary action, including possible termination.

## CONTRACTOR BADGES

Contractor definition.

A contractor is a vendor, supplier, professional service representative or consultant (contractor) who has business with the Greenbelt Management and is authorized by the Department to work on-site.

Contractor requirements.

- (1) Contractors are required to sign in and receive an identification badge if they will be accessing limited access areas of any Greenbelt Management facility.
- (2) Contractors who will be on Greenbelt Management facilities for only one day or less will be provided a Visitor Badge.
- (3) Administrative assistants must be trained to issue visitor badges to contractors entering Greenbelt Management facilities.
- (4) Contractors should be instructed to wear their badges properly while in limited access areas of the Greenbelt Management.
- (5) An employee must escort all contractors into and from limited access areas.

Long-term contractor badges.

- (1) At the request of a department manager, a contractor who will be on Greenbelt Management facilities for more than one day, or who will not be escorted by an employee will be issued a contractor identification badge by the general manager and recorded in [Identification Badge Issuance Log](#).
- (2) Contractors should be instructed to wear their badge while in limited access areas of any Greenbelt Management facility.
- (3) Contractor badges must be returned to the department manager at the end of each project.
- (4) Department managers who authorize contractor badges are required to make arrangements prior to the work-start date. Pertinent information must be given to designated security badge providers.

Lost or stolen contractor badges.

Contractors who misplace, lose, or has a badge stolen must immediately notify appropriate department manager to receive a replacement badge.

Limiting access to others.

Any contractor not wearing a badge in a limited access area must be questioned by employees and reported to a manager.

## VISITOR BADGES

Visitor defined.

A visitor is any individual who is conducting business with Greenbelt Management other than a qualified patient or their caregiver, contractor, or employee.

Visitor badge required.

All visitors to any Greenbelt Management facility are required to sign in and receive a visitor's badge if they will be accessing limited access areas of these facilities. Administrative assistants must be trained to issue visitor badges to visitors entering Greenbelt Management facilities. Visitors should be instructed to wear their badge properly while in limited access areas. Visitors may not wear their badge off-site.

Lost visitor badge.

Visitors who lose their badges must immediately notify an employee.

#### SEPARATION OF EMPLOYMENT OR COMPLETION/TERMINATION OF CONTRACTOR SERVICES

Upon separation of employment or completion/termination of contractor services, Greenbelt Management identification badges must be returned to a department manager immediately.

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GREENBELT MANAGEMENT QUALITY CONTROL AND RECALL PROCEDURES  
DRAFT



**Quality Control and Recall Plan**

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REVISION HISTORY

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## QUALITY CONTROL AND RECALL PLAN SUMMARY

The Quality Control and Recall Plan outlines company procedures for quality control that will ensure the production and processing of marijuana is in full compliance with Department regulations and mandatory testing requirements. The provisions contained herein are established to ensure all marijuana produced by Greenbelt Management is tested for contaminants and cannabinoid profile in compliance with testing guidelines published by the Department, and to ensure that the results of all testing are maintained for no less than one year. A contractual arrangement for testing services will be maintained by Greenbelt Management at all times, with an appropriately accredited laboratory approved by the Department.

Procedures for handling voluntary and mandatory recalls of marijuana are included with procedures for addressing customer complaints and incidents requiring product withdrawals. Incident classification terms are defined with distinct mitigation procedures, as the term “recall” can have legal significance, insurance and liability implications. The term “recall” will be used carefully and only when regulations mandate. Examples of incidents to be addressed with recall or withdrawal procedures are provided, and measures for required mock withdrawal and recall drills are detailed. Provisions include plans for the establishment of a Recall Management Team, which will be responsible for product traceability and for coordinating all aspects of a withdrawal or product recall. A Recall Management Team contact sheet is included here and will be maintained and updated by the general manager. Sample forms from the Complaint Log and the Withdrawal and Recall Log component of the Incident Log are included. In the instance of a Recall, the Department will be notified within 24 hours.

## QUALITY ASSURANCE

Marijuana processing.

All marijuana must be processed in a safe and sanitary manner. Only the leaves and flowers of a female marijuana may be processed and must be:

- (1) Well cured and free of seeds and stems;
- (2) Free of dirt, sand, debris and other foreign matter;
- (3) Free of contamination by mold, rot, other fungus, and bacterial diseases;
- (4) Prepared and handled on food-grade stainless steel tables; and
- (5) Packaged in a secure area.

## PRODUCT TESTING

Compliance with Department testing directives.

It is the policy of Greenbelt Management to comply with all Department testing guidance, including but not limited to:

- (1) Approved laboratories;
- (2) Frequency required;
- (3) Contamination response plans;
- (4) Lot size; and
- (5) Sample size.

Required testing.

All marijuana cultivated by Greenbelt Management must be tested. Mandatory testing includes:

- (1) Cannabinoid profile, and
- (2) Contaminant presence (to be determined by the Department) including, but not limited to:
  - (a) Mold;
  - (b) Mildew;
  - (c) Heavy metals;
  - (d) Plant growth regulators; and
  - (e) Non-organic pesticides.

Additional testing may be required.

The Department may require additional testing. Greenbelt Management must comply with all published Department testing requirements.

Laboratory contract required.

Greenbelt Management must maintain a contractual arrangement for testing services at all times including a clause that requires the persons responsible for testing be authorized by the Department.

All contractual services must be provided by a laboratory that is:

- (1) Accredited to International Organization for Standardization (ISO) 17025 by a third party accrediting body such as A2LA or ACLASS; or
- (2) Certified, registered, or accredited by an organization approved by the Department.

Sample transportation.

All marijuana transported to a laboratory for testing purposes will be done in accordance with the procedures in the Product Storage and Transportation Plan.

Excess marijuana returned.

Any excess test material returned by a laboratory to Greenbelt Management must be handled in accordance with the procedures in the Inventory Management and Waste Disposal Plan.

Recordkeeping.

All test results must be maintained for at least one year.

## PRODUCT COMPLAINTS, WITHDRAWAL, AND RECALL PROCEDURES

Investigation of a complaint.

- (1) Once notification of a withdrawal, recall, or customer complaint has been received, it is necessary to begin accurate and detailed documentation and product tracking.
- (2) Gather information from the customer, supplier, or regulator about the nature of the product complaint.
- (3) The general manager must assemble the personnel or experts needed to conduct a product complaint investigation.
- (4) Conduct a thorough investigation into the problem with the affected product.
- (5) Determine the nature and potential causes of the problem.
- (6) Determine any other product(s) that may potentially be affected.
- (7) Enter all information into the [Complaint Log](#).

- (8) Determine, from the criteria below, whether:
- (a) Product Recall: Food Safety or Health Risk due to physical, chemical, biological or immunological. Proceed to Recall Classification SOP.
  - (b) Product Withdrawal: a quality related issue with the affected product(s).
  - (c) No Corrective Actions: an isolated incident with the affected product(s).

Objectives of withdrawal and recall procedures.

- (1) Stop distribution of the affected product;
- (2) Effectively notify management, customers, and the Department of the withdrawal or recall;
- (3) Efficiently remove the affected product from the patient population;
- (4) Remove the affected product from storage and distribution areas;
- (5) Dispose of the affected product;
- (6) Conduct a root cause analysis and report the effectiveness and outcome of the recall; and
- (7) Conduct a post recall meeting for evaluation.

Determining the need for a recall or withdrawal.

There are two levels of product recall: recall and withdrawal. A recall is generally undertaken to protect patient health and safety. In the event of a recall, Greenbelt Management must issue a press release and notify the Department immediately. A withdrawal is generally conducted for quality purposes or as a precautionary measure before an official recall is implemented. A press release and Department notification may not be necessary in the event of a withdrawal (i.e. a defective vaporizer recall).

The general manager is responsible for the determination and execution of a recall or withdrawal. Greenbelt Management must begin execution of a withdrawal or recall immediately upon any request or mandate from any regulatory body with authority to do so.

The general manager must determine the need to execute a withdrawal or recall of any marijuana, vaporizer, or other product distributed from the company in order to protect patient health from products that present a risk of injury or gross deception, or otherwise are defective.

If the general manager is unsure of the need for withdrawal or recall or of the correct event classification, the president must be contacted immediately for a decision. The president may engage the services of an expert to assist the process.

The general manager must notify the insurance company and determine coverage. If the event is covered, the general manager must file all documentation necessary after the completion of the withdrawal or recall.

The general manager must notify legal counsel and maintain communication with counsel throughout the withdrawal or recall procedures. Any recommendations by counsel for alternative procedures must be approved by the president.

Classification of a withdrawal or recall.

The classification of a recall typically involves the presence of bacteria or a substance that may cause a potential allergic reaction. The term “recall” can have legal significance, insurance, and liability implications. The term should be used carefully and only when regulations mandate. Otherwise, the term withdrawal must be used.

Any determination by the general manager to implement recall procedures must be supported by test results or other scientific documentation or expert opinion.

An assessment should be done to determine the procedures to implement. The following points must be considered:

- (1) Whether or not any disease or injuries have already occurred from the use of the product.
- (2) Assessment of hazard to various segments of the population, e.g., immune compromised patients, surgical patients etc., who are expected to be exposed to the product being considered, with particular attention paid to the hazard to those individuals who may be at greatest risk.
- (3) Assessment of the degree of seriousness of the health hazard to which the population at risk would be exposed.
- (4) Assessment of the likelihood of occurrence of hazard.

The following examples would constitute an incident requiring a withdrawal or recall:

- (1) Product found with a pesticide residue for an illegal/restricted chemical.
- (2) Product found with a pesticide residue above permitted legal limits.
- (3) Known, assumed or suspected product contamination by chemical, physical or microbiological hazards. This would include blood contamination. (Examples of physical contamination would include plastic, glass, wood, metal and pest).
- (4) Incorrect labeling which may constitute a breach in food safety, quality or legality standards.
- (5) Notification from a supplier that any of the above had occurred to product prior to supply.
- (6) Malicious contamination.

A withdrawal or recall event must be assigned to one of the following classes:

- (1) Class 1: When there is an emergency situation involving removal from the market of products in which the consequences of use or exposure to the product are life threatening or involve a serious adverse health consequence.
- (2) Class 2: When there is a situation in which the use of, or exposure to, a contaminated product may cause temporary adverse health consequences or where the probability of serious adverse health consequence is remote (for example, pathogenic bacterial population, exclusive of *C. botulinum*, adequate to cause food poisoning).
- (3) Class 3: When there is a situation in which the use of, or exposure to, the product is not likely to cause adverse health consequences (for example a non-hazardous labeling violation).

Withdrawal and recall team.

A team responsible for traceability is required for any withdrawal or recall event. The team is responsible for coordinating all aspects of a withdrawal or product recall. A recall coordinator is to be appointed by the general manager and members of a recall team will be identified from the various functional areas. Together the team will assist the recall coordinator in the event of a withdrawal or recall event in accordance with Greenbelt Management's [product recall and withdrawal procedure](#). All team members must ensure that all procedures are carried out effectively and efficiently. The team is to receive appropriate training through mock withdrawal and recall procedures semi-annually so that they understand their responsibilities. The withdrawal and recall team list must be updated at least four times by the general manager per year to ensure all names, contact phone numbers, and responsibilities of team members and alternates are updated.

Product tracking required.

There are four types of product tracking:

- (1) Finished product – includes all product sold and tracked utilizing the point of sale system.
- (2) Work in progress – tracked utilizing the inventory management system.
- (3) Ingredient –all ingredients received can be tracked utilizing the [Receiving Log](#).
- (4) Packaging – all packing used for marijuana products can be tracked utilizing the [Receiving Log](#).

Finished product tracking.

All products which have been partially or completely distributed fall into this category including products for sale in the vault.

- (1) Assemble the personnel needed to conduct tracking of a finished product.
- (2) Identify the affected and any other potentially affected product(s), product code(s) and production date(s).
- (3) Determine the quantity of affected product(s) produced.
- (4) Determine from the inventory management system and point of sales system the last day of shipment (and the customer) for the affected product(s).
- (5) Determine from the point of sale system all the customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment).
- (6) Determine from the inventory management system the remaining quantity of the affected product(s) in our inventory.

Work in progress tracking.

All products which have not been distributed fall into this category including, but not limited to vegetative and flowering plants, marijuana in storage, and infused oils or butters in storage.

- (1) Assemble the personnel needed to conduct tracking of a work-in-progress product.
- (2) Identify the affected and any other potentially affected product(s), product code(s) and production date(s) from the production records.
- (3) Determine from the inventory management system and production records the quantity of the affected product(s) produced.
- (4) Locate the affected product(s) from the cultivation area, storage areas, cooler(s), freezer(s), etc.

Ingredient tracking.

All ingredients for cultivation or manufacturing fall into this category.

- (1) Assemble the personnel needed to conduct tracking of an ingredient.
- (2) Identify the affected and any other potentially affected ingredient(s) and lot number(s)/lot code(s)/production code(s)/best before date(s)/receiving date(s).
- (3) Determine from the [Receiving Log](#) the quantity and the receiving date of the affected ingredient(s) received.
- (4) Based on the lot number/receiving date, determine from the production records the period of use for the ingredient.
- (5) Determine from the production records all the finished product(s) produced by the affected ingredient(s).
- (6) Determine from the production records the quantity of the affected product(s) produced during this period.

- (7) Determine from the production records and the inventory records the day the affected product(s) entered into our inventory (i.e. packaging date).
- (8) Determine from the point of sale system the last day of shipment (and the customer) for the affected product(s).
- (9) Determine from the point of sale system all the customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment)
- (10) Determine from the inventory management system the remaining quantity of the affected product(s) in our inventory.

#### Packaging material tracking.

Any packaging material or containers used for work in progress or finished products fall into this category.

- (1) Identify the affected and any other potentially affected packaging material(s) and lot number(s)/quality control code/receiving date(s).
- (2) Determine from the [Receiving Log](#) record the quantity and the receiving date of the affected packaging material(s) received.
- (3) Based on the type and size of the packaging material, determine all the finished product(s) associated with the affected packaging material(s).
- (4) Determine from the production records the period of use for the affected packaging material(s).
- (5) Given the affected period and product, determine from the inventory management system the quantity of the affected product(s) associated with the affected packaging material(s) in this period.
- (6) Determine from the production records and inventory management system the day the affected product(s) entered into our inventory (i.e. packaging date).
- (7) Determine from the point of sale system the last day of shipment (and the customer) for the affected product(s).
- (8) Determine from the point of sale system all the customers who purchased the affected product(s) during this period (i.e. period = day of packaging to last day of shipment).
- (9) Determine from the inventory management system the remaining quantity of the affected product(s) in our inventory.
- (10) Locate any remaining affected packaging material(s) from the storage shelves and cabinets.

#### Executing a withdrawal or product recall.

- (1) Assemble the withdrawal or recall team ensuring adequate resources are available for the severity of the issue.
- (2) Gather all information collected in the tracking process.
- (3) Detain and segregate all products to be recalled which are in our control. Adhere a DO NOT DISTRIBUTE sign and complete the Withdrawal and Recall Log component of the [Incident Log](#).
- (4) Send a Notification of Recall to the affected customers.
- (5) Notify the Department within twenty-four hours.
- (6) Ensure the following information is accurately provided:
  - (a) Name and Product Code of the withdraw/recalled product(s).
  - (b) Production date(s) of the withdraw/recalled product(s).
  - (c) Reason for the withdrawal/recall.
  - (d) Quantity of withdraw/recalled product(s) distributed.

- (e) Quantity of withdraw/recalled product(s) in inventory (for internal use only).
- (f) Area(s) of distribution and customers affected (for internal use only).
- (7) Coordinate and monitor the recovery of all affected product(s); all products in the homes of customers should be picked up by Greenbelt Management employees in accordance with Greenbelt Management's **Product Storage and Transportation Plan**.
- (8) Conduct a reconciliation of the total quantity of recalled product and affected product in inventory against the total quantity produced.
- (9) Randomly remove and submit samples of recalled product(s) to an independent laboratory for testing as appropriate.
- (10) Collect testing results and discuss the results and corrective actions that may be required with the Department.
- (11) The general manager must prepare a Withdrawal and Recall Report.

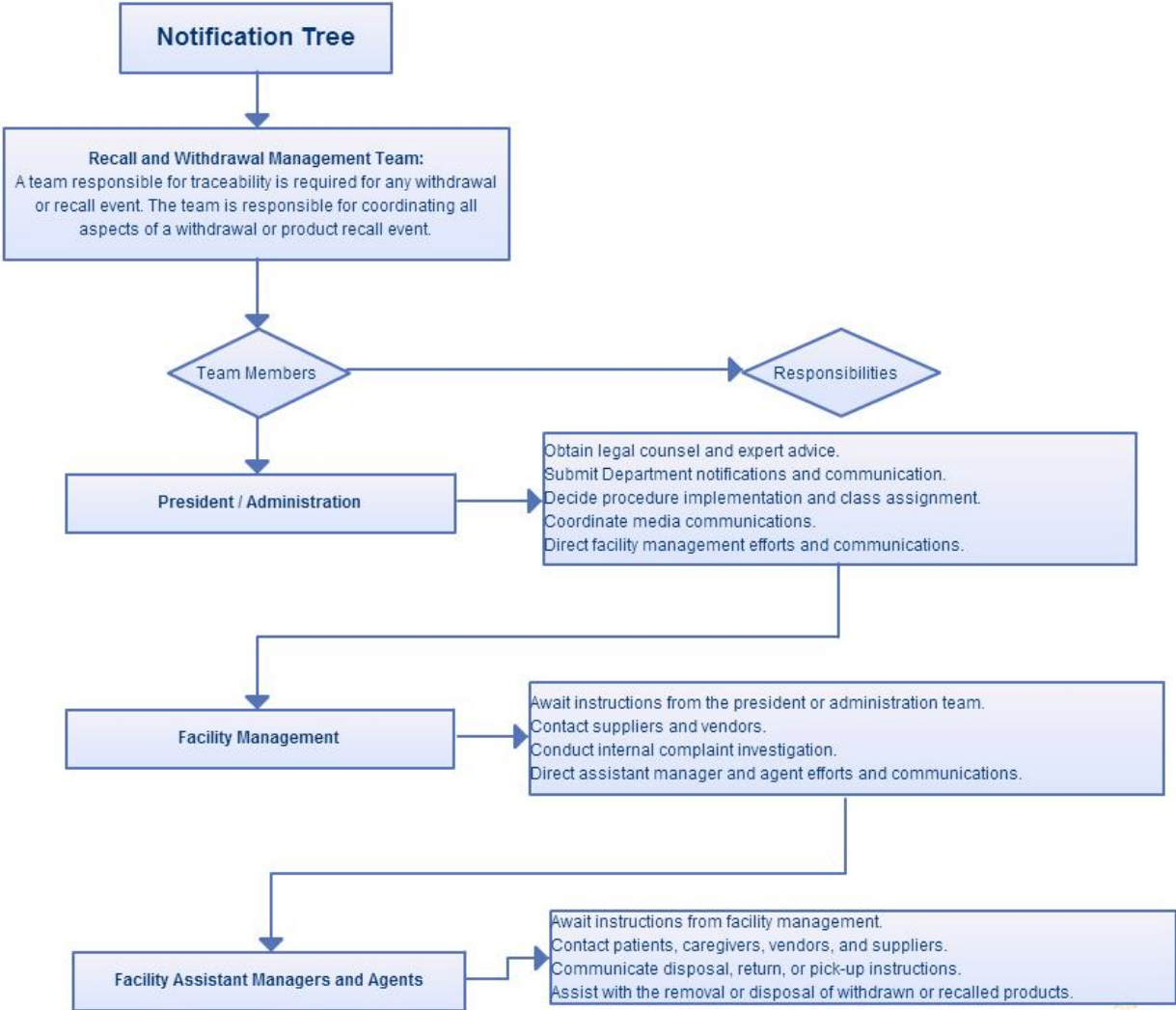
Mock withdrawal and recall drills required.

Mock recalls are used to determine whether the withdrawal and recall procedure is capable of identifying and quickly controlling a given lot of potentially affected product and reconciling the quantities produced, quantities in inventory, and quantities distributed. A mock withdrawal or recall will identify potential problems and allow personnel to become familiar with recall procedures. If problems are identified in the recall procedures, they will be corrected by the general manager and employees must be retrained on new procedures.

- (1) The general manager must carry out mock withdrawal or recall procedures at least annually by randomly selecting one marijuana product and one vaporizer for withdrawal.
- (2) The mock procedures should follow all regular procedures, however, no product should be taken from patients or removed from inventory or storage.
- (3) All information obtained during a mock withdraw or recall must be documented on the Withdrawal and Recall Log component of the [Incident Log](#).
- (4) All patients involved in a mock withdrawal must be notified immediately that it is a mock procedure.
- (5) The mock recall file should include the name, address and telephone number of clients for the lot tested, production records, the inventory, and distribution of each lot distributed.
- (6) All corrective actions and deficiencies must be documented in a mock withdrawal and recall report to be submitted to the president.
- (7) Any corrective actions or deficiencies must be corrected by the general manager and employees must be re-trained on new procedures.



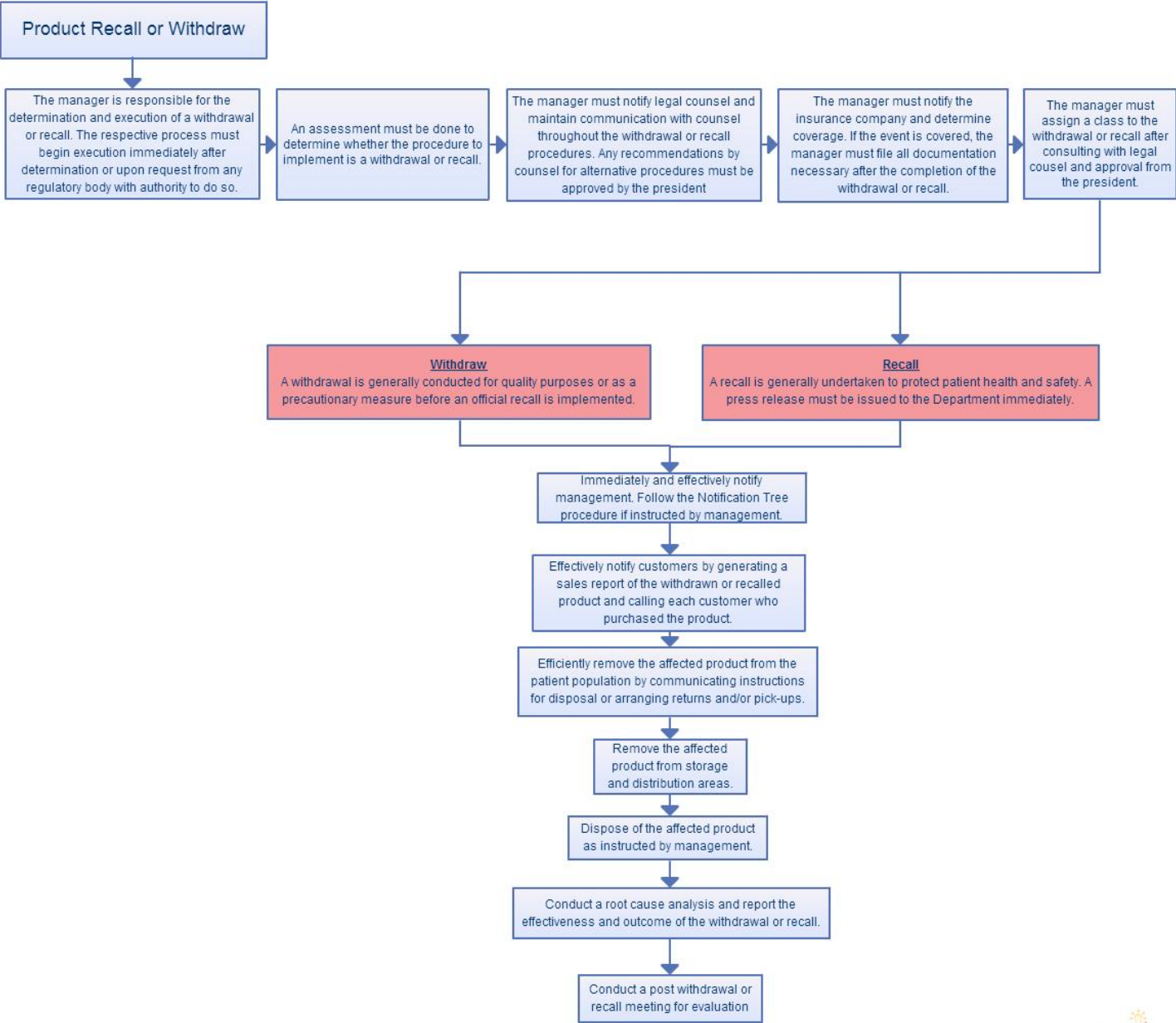
**Exhibit: Notification Process**



[online diagramming & design] [creately.com](https://www.creately.com)



**Exhibit: Withdrawal or Recall Process**



[online diagramming & design] [creately.com](https://creately.com)

**Exhibit: Receiving Log**

\*This form should be completed [online](#).

## Receiving Log

Date:

Enter the items being received and the quantity of each:

Name of the vendor/distributor:

Enter the employees responsible for receiving the order:

Was this order accepted?

- Yes  
 No

Are there any discrepancies with this order? If so, provide details.

Attach purchase order and invoice:

Signature:

**Exhibit:  
Incident  
Log**

\*This form should be completed [online](#).

## Incident Log

This incident log must be completed by the manager or staff person in charge as soon after the incident as possible and be a true and accurate statement of what happened.

Date of incident

Time of incident

Date of report

Time of report

Person making the report

Type of incident

Security

Injury

Theft

Alarm event

Withdrawal or recall

Other

Description of what happened and the location of the incident:

Name of and contact information for persons involved and their relationship to Eagle Organics (i.e. staff, patient, contractor, neighbor, etc.)

Who was the incident reported to:

Manager

Staff person in charge

Law enforcement (any documentation must be filed by the manager)

Other

If reported to law enforcement include details here (i.e. time contacted, station contacted, name of responding officer, etc.).

If the injury required emergency treatment include details here (i.e. type of injury, ambulance called, hospital providing treatment, etc.).

Describe any follow-up required.

---

Signature:

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REVISION LOG

Version	Revision	Date	Description	Author	Approval
1.0		11/1/13	Plan release.	Greenbelt Management	BOD – 11/1/13

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## CULTIVATION PLAN SUMMARY

The Cultivation Plan describes how to operate a secure marijuana cultivation facility in accordance with law, regulations, and industry best practices. All cultivation and processing operations must occur in limited access areas, secured and monitored by a surveillance camera system.

A designated cultivation manager will be responsible for ensuring full compliance with the operational policies and procedures detailed in this section. In addition to procedural compliance, the cultivation manager will be responsible for the prevention and management of plant disorders and will follow a general plant healthcare checklist to ensure a healthy cultivation environment. The cultivation manager will be responsible for daily cultivation monitoring and maintenance of cultivation records. These records will be made available for inspection and by authorized representatives of the business, law enforcement, and the Department.

Additional provisions regarding sanitation, quality control, and related testing practices are detailed throughout the plan. Cultivation safety practices are outlined in full, and department-specific safety considerations will be identified and mitigated by the cultivation manager.

## CULTIVATION REGULATORY

### Sec. 21a-408-55. Manufacturing of marijuana products

- (a) producer shall only manufacture or sell marijuana products in the following forms:
  - (1) Raw material;
  - (2) Cigarettes;
  - (3) Extracts, sprays, tinctures or oils;
  - (4) Topical applications, oils or lotions;
  - (5) Transdermal patches;
  - (6) Baked goods; and
  - (7) Capsules or pills.
- (b) No marijuana product shall:
  - (1) Include alcoholic liquor, dietary supplements or any drug, except for pharmaceutical grade marijuana. For purposes of this provision, alcoholic liquor does not include any liquid or solid containing less than one-half of one percent of alcohol by volume or ethanol-based tinctures with an alcohol level approved by the commissioner;
  - (2) Be manufactured or sold as a beverage or confectionary;
  - (3) Be manufactured or sold in a form or with a design that:
    - (A) Is obscene or indecent;
    - (B) May encourage the use of marijuana for recreational purposes;
    - (C) May encourage the use of marijuana for a condition other than a debilitating medical condition; or
    - (D) Is customarily associated with persons under the age of eighteen;
  - (4) Have had pesticide chemicals or organic solvents used during the production or manufacturing process, except that the commissioner may authorize the use of pesticide chemicals for purposes of addressing an infestation that could result in a catastrophic loss of marijuana crops.
- (c) Any marijuana product not in compliance with this section shall be deemed adulterated.

## CULTIVATION OPERATIONS - GENERAL

### Culture of safety.

Greenbelt Management values employee and patient safety above all other operating principles. As a producer of medical marijuana products, Greenbelt Management and all of our employees and agents are responsible for distributing uncontaminated and safe medical marijuana products to qualified patients. Managers responsible for development and implementation of policies and procedures must ensure that the safety of our stakeholders is the first concern addressed and mitigated in every policy and procedure.

### Guiding principles.

- (1) In addition to our top level commitments to employee and product safety, Greenbelt Management is committed to:
  - (a) Utilizing pesticides only as a final measure.
  - (b) Basing cultivation decisions on experience and accepted science.
  - (c) Implementing sustainable cultivation practices whenever possible.
- (2) Greenbelt Management policies and procedures must be developed to:
  - (a) Produce consistent and predictable yields.
  - (b) Facilitate necessary employee communication in the facility.
  - (c) Provide valuable operating information and data for management.
  - (d) Create fully compliant, yet efficient operations.
  - (e) Provide transparent information on methods and products used in cultivation for patients and their caregivers.
  - (f) Balance expenses with the necessity and benefits of policies and procedures and regulatory compliance.

### Restricted operations.

Any Greenbelt Management cultivation facility must be properly licensed by the Department for all operations. The board of directors must approve all cultivation operations in the facility in accordance with all applicable laws and regulations.

### Secure facility.

- (1) All cultivation employees must receive security training and comply with all department specific security measures, as well as, all Security Plan procedures.
- (2) No marijuana in any stage of cultivation may be visible to other departments or to the public. No signage shall identify the cultivation facility or its operations to other departments or the public.
- (3) Access to the cultivation facility is restricted to cultivation employees and approved visitors in accordance with Greenbelt Management Visitor procedures. Unannounced visits to the cultivation facility are prohibited except for Department visits as described in the Compliance and Audit Plan.

### Cultivation manager responsibilities.

- (1) The cultivation manager must ensure that all cultivation operations are safe for employees, produce safe marijuana for patients, and are in compliance with all applicable Greenbelt Management policies, laws, and regulations and industry best standards.

- (2) The cultivation manager must be familiar with the layout and technical specifications of the facility and equipment and be able to perform and train others to perform all activities necessary in the facility.
- (3) The cultivation manager must be able to identify and appropriately react to all incidents.
- (4) The cultivation manager must complete or assign completion of a Daily Walk-Through Log to ensure compliance with policies and regulations.
- (5) The general manager must ensure the cultivation manager is provided with necessary resources for compliance including third-party advisory services as necessary.

## CULTIVATION FACILITY EXPANSION

Commitment to access.

Greenbelt Management is committed to providing patients with access to sufficient quantities of safe and effective medical marijuana. It is critical that Greenbelt Management be able to continue to meet patient demand by expanding the cultivation facility in a quick and efficient manner with minimal impact on the environment and the surrounding community. At the same time, Greenbelt Management is committed to responsible fiscal management. The board of directors must approve any cultivation facility expansion when operationally necessary and fiscally feasible.

Approval required.

The general manager shall obtain Department approval prior to beginning any cultivation facility expansion.

## LIMITED ACCESS AREAS – CULTIVATION FACILITY

Cultivation in limited access areas only.

All phases of the cultivation of marijuana must take place in designated, locked, limited access areas that are monitored by a surveillance camera system in accordance with video surveillance requirements in the Security Plan in accordance with applicable laws and regulations.

Restricted access to limited access areas.

- (1) All cultivation facility limited access areas must be maintained by the cultivation manager in accordance with all policies and procedures in the Facilities and General Operations Plan.
- (2) Only employees registered with the Department visibly displaying their registration identification or approved visitors accompanied by an employee may enter limited access areas.
- (3) The cultivation manager shall ensure limited access areas are secure at all times.
- (4) All areas of ingress and egress to limited access areas within the cultivation facility shall be clearly identified with a sign no smaller than 12" x 12" which reads, "Access to this area is restricted to persons registered with the Department visibly displaying a registration identification card."

## PLANT HEALTH CARE

Holistic crop management practices.

Cultivation of safe and effective crops must encompass a wide variety of holistic management practices. The general manager must develop and implement an Integrated Crop Management plan that ensures healthy crops and yields.

Prevention of abiotic and biotic disorders.

Abiotic and biotic disorders include infectious microbes such as pest infestations, fungi, bacteria, viruses, nematodes and noninfectious environmental factors. Disorders can be prevented through management of multiple factors to create an optimal cultivation environment. All cultivation employees are responsible for management of plant health care factors as directed by the cultivation manager, including:

- (1) Plant selection and genetic diversity.
- (2) Environmental control and air quality.
- (3) Pest management.
- (4) Water application and quality.
- (5) Sanitation and hygiene.
- (6) Equipment maintenance.
- (7) Chemical applications.
- (8) Nutritional balance.
- (9) Early identification of deficiencies and toxicities.

General plant health care checklist.

The cultivation manager shall ensure a healthy cultivation environment. All cultivation employees must be active participants in the management of cultivation facilities for optimal conditions. The checklist is a guideline for environmental awareness and general operating procedures. The general manager shall assign responsibility of tasks, determine frequency, and monitor performance.

- (1) Facility
  - (a) Seal cracks immediately to avoid free moisture and light seepage in cultivation areas.
  - (b) Maintain proper insulation of walls and pipes.
  - (c) Utilize aspiration boxes to secure thermostats, environmental control switches, and other critical controls.
  - (d) Maintain pipes and thermostats annually.
- (2) Sanitation and hygiene
  - (a) Every person entering cultivation areas must wear the proper attire including clean clothes or uniforms and closed toe shoes that have not been used in external cultivation facilities.
  - (b) Employees must wash hands frequently and after every break.
  - (c) No waste plant material should be left in the open.
  - (d) No trash should remain in the facility longer than twelve hours. Remove trash after every shift.
- (3) Environmental control
  - (a) Ensure doors are closed completely keep areas sealed.
  - (b) Each cultivation employee must be trained to adjust temperature and relative humidity levels.
  - (c) Maintain proper distance between plant canopy and light fixtures.
  - (d) The cultivation manager must develop and maintain a power outage plan.
- (4) Cultivation areas

- (a) Do not overcrowd plants in cultivation areas.
  - (b) Ensure reflector ducting is well sealed to prevent micro climates.
  - (c) Keep all cultivation areas free of plant litter, spilled dirt, equipment, etc.
  - (d) Remove plant materials from pruning operations throughout the day.
  - (e) Thoroughly disinfect areas weekly and after each harvest.
- (5) Equipment and tools
- (a) Disinfect tools after every shift and every propagation operation and return to their proper place.
  - (b) Do not reuse rooting hormone, discard according to the label instructions.
  - (c) Sanitize pots prior to each use.
  - (d) Hoses must be stored off the floor. Place nozzles upright. Use a ball shutoff valve to prevent spills.
  - (e) Employees must be properly trained on the use of all tools and equipment.
- (6) Stain selection
- (a) Cultivate disease resistant strains whenever possible.
  - (b) Dispose of infected plants, do not move them into any clean areas.
  - (c) Isolate cuttings, seeds, and mother plants away from propagation areas.
  - (d) Check cuttings daily for rot, discard any cuttings with lesions or low root mass.
- (7) Plant care
- (a) Plant density is crucial to yield. Ensure plants have lateral room for branching.
  - (b) Ensure plant foliage is dry prior to dark periods.
  - (c) Irrigate plants early as possible in the light period and adjust irrigation levels seasonally.
  - (d) Inspect each cultivation area daily for signs of abiotic and biotic disorders.
  - (e) Do not reuse media unless proper procedures including sterilization are implemented to prevent contamination.
- (8) Integrated pest management
- (a) Early identification of pest infections is crucial. Each cultivation employee must be trained on and responsible for plant inspection and identification.
  - (b) A variety of acceptable mechanical, physical, and biological controls must be implemented.

Spray and feeding protocols required.

The cultivation manager must maintain a current a plant spraying and feeding protocol. Each cultivation employee must review the spraying and feed protocols daily. Each employee is responsible for following the established protocol unless otherwise directed by the cultivation manager. Any variance from the published protocol must be recorded in the Procedure Variance Log. Records of published protocols should be maintained for twenty-four months at a minimum. The protocol must detail for each strain in production:

- (1) Product to be applied.
- (2) Reason for application.
- (3) Method of application.
- (4) Frequency of application.
- (5) Next scheduled date of application.
- (6) Employee responsible for next application.
- (7) Status of lights, HVAC, and air circulation during application (i.e. lights on, HVAC off, and fans off).
- (8) PPE required for application (i.e. mask required, Tyvex suit optional).

- (9) Restrictions preventing application (i.e. do not apply within four hours of any foliar application).
- (10) Life Cycle Stage restrictions - (i.e. apply in vegetative state only or may be applied in all stages).
- (11) Re-entry intervals.
- (12) Posting requirements.
- (13) Other precautions (i.e. cover medium).

## BASIC PLANT NUTRIENT INFORMATION

Primary non-mineral nutrients.

Primary non-mineral nutrients include carbon, hydrogen, and oxygen. These are primarily delivered to plants through air and water. These nutrients are crucial to all plant life.

- (1) Carbon is taken up by plants as CO<sub>2</sub>. Carbon impacts structural components of the plant.
- (2) Hydrogen and oxygen are delivered to the plant through air and water. Hydrogen impacts the plant cell membranes maintenance of electrical charge and oxygen is essential for respiration and nutrient uptake.

Primary mineral nutrients.

Primary nutrients are delivered to plants through soil. Base media for hydroponic systems and soilless systems are nutrient neutral. Nutrients are added to plants through soil amendments, nutrients, and other supplements including carbon dioxide generation.

- (1) Nitrogen (N) is an essential element of multiple essential plant compounds and is crucial to photosynthesis. Excess N can increase susceptibility to insects and disease. Common methods for introducing nitrogen include worm castings, compost, blood meal, fish emulsion, and guano. The cultivation manager must ensure the safe application of any of these materials.
- (2) Phosphorous (P) impacts most plant functions and stimulates blooming, early plant growth, and decreases length of plant cycles. Deficiencies can delay flowering and increase potential for fungi and can occur in plant media that is wet and cold.
- (3) Potassium (K) is crucial to most metabolic processes. Potassium impacts stalk and stem health and root growth. Deficiencies reduce bud density.

Secondary nutrients.

- (1) Calcium (Ca) enhances plant elasticity. A deficiency cause stunted growth and brittleness and increased risk of disease.
- (2) Magnesium (Mg) regulates plant uptake of essential elements and aids carbohydrate metabolism. Mg impacts plant oils and crystal production.
- (3) Sulfur (S) is an essential component in development of oils and aromatic compounds (terpenes).
- (4) Boron (B) impacts cell wall formation and aides in metabolism of other nutrients and fat.
- (5) Chloride (Cl) is involved in photosynthesis and oxygen production.
- (6) Copper (Cu) improves the color and flavor of plant fruits. Deficiencies can cause weak stems.
- (7) Iron (Fe) functions with S to form compounds and catalyze other plant functions.
- (8) Manganese (Mn) is essential in chlorophyll synthesis. Plays a role in CBD synthesis.
- (9) Molybdenum (Mo) is essential to plant growth at very low levels.



- (10) Zinc (Zn) is a critical enzyme activator. Zinc deficiencies are extremely problematic in cannabis plants.
- (11) Sodium (Na) improves nitrogen metabolism and assists in osmotic balance in plants.
- (12) Cobalt (Co) is involved in plant DNA formation.
- (13) Nickel (Ni) functions with iron and impacts nitrogen uptake.
- (14) Silicon (Si) is a component of cell walls and enhances resistance to disease.

#### Common nutrient deficiencies.

- (1) **Mobile nutrients.** Mobile nutrients are transferred by the plant to young tissue in order to extend the life of a stressed plant. Mobile nutrients include: Nitrogen (N), Phosphorous (P), Potassium (K), Magnesium (Mg), Zinc (Zn), and Molybdenum (Mo). Symptoms of mobile nutrient deficiencies typically appear on the bottom (older) leaves.
- (2) **Immobile nutrients.** Symptoms of deficiencies from immobile nutrients typically appear in young leaves near the top of a plant. Less mobile nutrients include Manganese (Mn), Boron (B), Calcium (Ca), Sulfur (S), Iron (Fe), and Copper (Cu).
- (3) The most common cannabis deficiencies are N, P, K, Ca, Mg, and S.

#### Nutrient toxicity.

Toxicity will often appear like deficiencies. The most typical toxicities include Mn, S, and Cu.

#### Nutrient balance checklist.

- (1) Check soil/media pH. Test all new media prior to planting.
- (2) Conduct plant tissue analysis.
- (3) Check daily for signs of deficiencies and toxicities:
  - (a) N – chlorosis (yellowing/discoloration) of new leaf tissue, orange-red discoloration on old leaves, small bud structure.
  - (b) P – tips of leaves and flowers brown and curl downward.
  - (c) K – older leaf tips burn and curl, petioles and branches redden.
  - (d) Ca – leaf margins curl with tip back.
  - (e) S – chlorosis with black outlines on the leaf and small bud structure. Can mimic N deficiency.
  - (f) B – gray spotting or chlorosis, terminal buds turn brown or gray.
  - (g) Cl – deficiencies are rare, wilted leaves, bronzing or chlorosis.
  - (h) Cu – young leaves wilt and die at the tips and margins.
  - (i) Fe – interveinal chlorosis with bright green veins and stunted plant growth.
  - (j) Mn – interveinal chlorosis with dull veins, white margins and green halo spotting on young leaves, purple stippling possible, reduced length and number of branches. Toxicity - molted leaves with orange-brown spots.
  - (k) Zn – interveinal chlorosis and green halo around the margin, wavy or wilted leaf margins, fibrous roots, fewer and smaller buds.
- (4) Maintain results in the Crop Maintenance Log.
- (5) Perform mitigation measures determined by the cultivation manager.

General guidelines for leaf tissue nutrient levels.

Nutrient	Desired	Measure
N	2.0-5.0	%
P	0.2-0.5	%
K	1.0-5.0	%
Mg	0.1-1.0	%
Ca	0.1-1.0	%
S	0.1-0.3	%
Fe	50-250	Ppm
Zn	20-100	Ppm
Mn	20-300	Ppm
Cu	5-20	Ppm
B	10-100	Ppm
Mo	0.1-0.5	Ppm
Cl	0.2-2.0	%
Si	0.2-2.0	%
Na	1.0-10	%
Co	0.2-0.5	Ppm
V	0.2-0.5	Ppm

## COMMON PLANT DISORDERS

Biotic disorders.

Biotic disorders are treated as outlined in the Integrated Pest Management plan. Common disorders include:

- (1) Two-spotted Spider Mite.
  - (a) The Two-Spotted Spider Mite is a serious pest, causing decreased plant vigor, bud size, and yield.
  - (b) Damage by the Two-Spotted Spider Mite does result in a general loss of color or bronzing due to feeding damage. They can cause death if left unchecked.
  - (c) Outbreaks usually are associated with insecticides, used to control other insect pests, which also destroy the predators that feed on the Two-Spotted Spider Mite.
  - (d) Feeding damage can occur without visible symptoms until large populations build up. The Two-Spotted Spider Mite lives on the undersides of the leaf and feeds from it.

- (e) Two-spotted Spider Mites are small, approximately 1/60- inch, and develop two dark blotches, one on either sides of the abdomen. They are yellow to pale green in color with two tiny red eyespots.
  - (f) During cool weather, the Two-Spotted Spider Mite will turn reddish orange, resembling a predatory mite, and remain inactive.
  - (g) The Two-Spotted Spider Mite has a wide host range and can easily be wind (fan) transported.
  - (h) Plants can tolerate up to 10 mites per leaflet up to harvest, but should be treated immediately upon discovery.
  - (i) After harvest, the plants can only tolerate less than five mites per leaflet.
  - (j) The critical period is three to four weeks prior to harvest, therefore weekly mite brushing sampling should be performed through harvest.
  - (k) Insecticides are not effective on mite populations.
- (2) Other common biotic pest disorders.
- (a) Russet mite.
  - (b) Thrips.
  - (c) Aphids.
  - (d) Whiteflies.
  - (e) Nematodes.
  - (f) Flea beetles.
  - (g) Fungus gnats.
  - (h) Millipedes.
  - (i) Borers.
  - (j) Budworms / Bollworms.
  - (k) Cutworms / Armyworms.
  - (l) Slugs.
- (3) Fungi and bacteria.
- (a) Gray mold (*Botrytis cinerea*).
  - (b) Powdery mildew.
  - (c) Hemp canker.
- (4) Other common cannabis disorders.
- (a) Genetic sterility.
  - (b) Leaf spots and disease.
  - (c) Nutritional diseases.
  - (d) Blight and wilt.
  - (e) Root rot.
  - (f) Nematode infestation.

## ENVIRONMENTAL CONTROL PLAN

Environmental control policy.

Greenbelt Management cultivates marijuana in a controlled environment. Controlled environments:

- (1) Mitigate seasonal limitations and provides sanitary operations.
- (2) Constrain unintended female pollination.
- (3) Allows optimal cultivation conditions and maximization of cannabinoid content.

Cultivation manager to monitor environment.

The cultivation manager is responsible for daily monitoring of environmental factors. The closed environment is slightly pressurized. All cultivation areas must be equipped with stand-alone environmental monitoring systems and any abnormal condition must be addressed immediately including, but not limited to:

- (1) Temperatures below 67°F.
- (2) Temperatures above 79°F.
- (3) Relative humidity below 40% in vegetation and 35% in flowering.
- (4) Relative humidity above 60% in vegetation and 49% in flowering.
- (5) Carbon dioxide levels below 1200 ppm.
- (6) Carbon dioxide levels above 1500 ppm.
- (7) Lights reading indicating necessary bulb replacement or bulb failure.
- (8) Water spills.

Monitoring equipment requirements.

Any environmental monitoring and control equipment installed in the cultivation facility must be approved by the general manger, and at a minimum:

- (1) Use a type 3 chemical detector capable of detecting carbon monoxide, low oxygen, and explosive environments;
- (2) Provide twenty-four hour monitoring, text alerts and audible alarms;
- (3) Contain a supplemental power source that provides twenty-four hours of operation; and
- (4) Record and store at least thirty days of recordings including:
  - (a) Light readings;
  - (b) Temperature;
  - (c) Humidity; and
  - (d) Carbon dioxide levels.

Cultivation lighting.

Light readings must be taken weekly. Each light should read 500 to 1000 micromoles 15" to 18" from the reflector lens. An average of 700 to 800 across the room is sufficient. The general manager must oversee a monthly rotation schedule of reflector cleaning and bulb replacements. Failed bulbs and ballasts must be replaced immediately. Employees must wear gloves when handling bulbs.

HVAC maintenance.

- (1) Replace or clean all filters monthly.
- (2) Keep drainage pipe running on handlers and check for clogs.
- (3) Use an air compressor to blow out the AC condenser monthly.
- (4) Check daily if the AC unit is cold to the touch when running.
- (5) Review schedules and settings on thermostat monthly.
- (6) Monitor temperature control exhaust fans for abnormal running times indicating radical microclimate developments.

## VENTILATION AND ODOR CONTROL

The odor from marijuana cultivation and processing can be a neighborhood nuisance and cause of disruption to the community. The cultivation manager must ensure that all odor control measures are sufficient and maintained.

Ventilation systems.

- (1) Cultivation areas should have properly balanced ventilation systems;
- (2) All intake fans must be equipped with UV and insect filters maintained in accordance with manufacturer recommendations; and
- (3) Dehumidifier equipment must be installed and maintained as necessary.

Odor control equipment.

- (1) The cultivation manager must ensure the regular maintenance of odor control equipment including regular cleanings and filter replacements as often as required.
- (2) Odor control equipment must employ activated carbon filtration and be serviced according to manufacturer's recommendations.

## CULTIVATION PLAN REQUIREMENTS

The cultivation manager must update the Cultivation Plan when Department regulations are added or revised and when industry best practice dictates a revision. This plan must contain description of practices and procedures required including the frequency with which they will be performed must be developed, implemented, and maintained herein including:

- (2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable. This list is to be maintained by the cultivation manager electronically in the Crop Maintenance Log;
- (3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented; and
- (4) A description of the recordkeeping system implemented to comply with the requirements established.

## EMPLOYEE TRAINING REQUIRED

- (1) All cultivation facility employees shall be trained by the cultivation manager and continually demonstrate a working knowledge of training materials as a condition of employment.
- (2) All employees are required to have a working knowledge of crop production standards established by the cultivation manager for medical marijuana production.
- (3) All changes to the Cultivation Plan shall be communicated to all cultivation facility employees and an acknowledgement of understanding must be documented for each employee.
- (4) Any variances from the policies and procedures contained herein shall be approved by the cultivation manager, reported to the general manager, and properly documented in the Procedure Variance Log.

## DOCUMENTATION REQUIRED

The general manager in coordination with the cultivation manager shall ensure that all documentation required for crop production is maintained in accordance with procedures contained herein. The cultivation manager may assign data entry tasks to qualified and trained employees. Paper logs maintained by cultivation employees must be retained for sixty months. Required documentation includes:

- (1) Field history, previous land use records, previous facility use records. Document the date, location, and identity of all materials applied to the land or in the facility for each cultivation facility during the past thirty-six months in order to establish the date of the last application of prohibited materials. Include all fertilizer and pest-management materials applied.
- (2) Activity logs. All cultivation activities must be recorded in the inventory management system or log maintained in the cloud record system. Activities that must be recorded include, but are not limited to:
  - (a) Planting/propagation;
  - (b) Material applications including formulas and quantities and notation if manure is applied;
  - (c) Pruning;
  - (d) Pest monitoring and actions taken;
  - (e) Harvest records and yields;
  - (f) Crop destruction;
  - (g) Procedure variances;
  - (h) Storage and transfer records; and
  - (i) Any unusual activities.
- (3) Compost production records. For in-house composting, record materials and quantities added, the estimated C/N ratio of the mixture. Record the date and temperature and the employee name each time the compost is turned.
- (4) Seed/planting stock records. Document any seed, cuttings, or planting stock used and document its origin. Record any seed treatments, coatings, or inoculants used.
- (5) Harvest records. The harvest records of each crop must be recorded in the inventory management system including the harvest date, crop identification, strain name, initial yield, final yield, storage location, and batch identification.
- (6) Crop disposition records. Record all crops removed from cultivation and processed as waste as outlined in the Inventory Management and Waste Disposal Plan.
- (7) Transfer records. Any transfer of crops from a production or storage location must be recorded in the inventory management system including date of transfer, responsible employee, second employee verification, batch identification, quantity, receiving location in accordance with the Inventory Management and Waste Disposal Plan.
- (8) Equipment maintenance records. Record the date, equipment description, materials used, description of the cleaning or maintenance performed, and the responsible employee.

## PROPAGATION PRACTICES

Inspection of material required.

The cultivation manager must:

- (1) Evaluate all propagation material to ensure that it is free of pests and diseases as necessary to guarantee healthy plant growth.
- (2) Examine propagation material to make sure that it is free of weeds or other species that are not the species to be cultivated.

Propagation records required.

Cultivation employees who propagate medical marijuana plants from seed, cutting, tissue culture, or any other means must keep accurate records to be entered into the inventory management system. Records must accurately identify and record the seeds or vegetative planting stock as to genus and species, and to subspecies, variety, cultivar, and/or hybrid if applicable.

Strain selection.

The cultivation manager in coordination with the general manager and production manager shall determine the mix of strains to be cultivated. The following items should be considered when determining strain selection:

- (1) The availability of the strain;
- (2) Medicinal benefits;
- (3) Other strains currently in production;
- (4) Average yield;
- (5) Length of cultivation cycle;
- (6) Patient demand;
- (7) Amount of plant material and quality available for extraction; and
- (8) Difficulty of processing.

## CROP AND SUPPLY MANAGEMENT

Greenbelt Management's mission is to provide consistent and effective medical marijuana products to our patients. When implementing cultivation procedures, the cultivation manager must consider the impact on consistency, quality, and efficacy.

- (1) A regular harvest cycle shall be maintained to ensure consistent supply, maximize efficiency, and allow for effective plant management techniques.
- (2) The cultivation manager shall coordinate with the general manager regularly to determine the appropriate level of production anticipating patient needs.
- (3) The cultivation manager must maintain an integrated pest management plan to protect crops from pest related damage and yield reduction including beneficial insect applications.
- (4) The cultivation manager shall develop production schedules that maximize yield and variety in each harvest cycle.
- (5) The cultivation manager shall maintain sufficient records to track, monitor, and make reasonable judgments about the effectiveness of crop management methods implemented.
- (6) The cultivation manager must report the effectiveness of any change in cultivation procedures to the general manager with a detailed analysis of the change in relation to the following items:
  - (a) Cost;
  - (b) Yield;
  - (c) Efficiency;

- (d) Employee safety;
- (e) Required training;
- (f) Potency;
- (g) Other test results; and
- (h) Feedback from users.

## PROHIBITED MATERIALS, SUBSTANCES, ADDITIVES, AND INGREDIENTS

Cultivation manager responsibilities.

The cultivation manager is responsible for approving all products, materials, nutrients, etc. used in cultivation and handling. All products used shall be documented and MSDS made available to employees. Written application procedures and proper training must be provided by the cultivation manager to all cultivation employees.

Crop applications must be recorded.

The Crop Maintenance Log must be maintained by the cultivation manager to record each substance used as a production or handling input, including:

- (1) Date applied;
- (2) Location and crop ID from the inventory management system;
- (3) Material product name;
- (4) Source/manufacturer (for custom in-house applications, list the constituent ingredients, and recipe including quantities mixed);
- (5) Purpose/reason for use;
- (6) Organic status verification; and
- (7) Application method and rate/amount.

Allowed applications.

Employees may not apply any substances to crops that is not directed for use on the current published spraying and feeding protocol or otherwise authorized and directed by the cultivation manager.

## WATER QUALITY AND IRRIGATION

Water policy.

Greenbelt Management recognizes the limited water resources that exist. Water conservation is a primary goal of our operations. The cultivation manager shall consistently review water resources, quality, and technological advancements in relation to cultivation. The cultivation manager, in coordination with the general manager, shall report to the board of directors any opportunities for conservation and efficiencies in the cultivation operations.

Compliance required.

The cultivation manager must ensure that cultivation operations comply with all state and local water regulations applicable.

Water quality requirements.

- (1) Cultivation employees must identify all water used on any medical marijuana crop in the Crop Maintenance Log including its source (i.e. well, gray water system, water supply



- company, or other sources) if the water did not originate from the municipal water supply.
- (2) The cultivation manager must test the water source quarterly, after any unusual natural event (flooding), and when PPM/pH readings change significantly. Testing must identify pathogenic microbes that may be present in water supplies (e.g., E. coli and other coliforms), heavy metals, pesticide residues, or other contaminants. Maintain records of all results in the Water Quality Log.
  - (3) All water used in the facility must, at a minimum, meet Human Health Standards for water quality.

#### Water equipment maintenance.

- (1) The cultivation manager is responsible for maintenance of hoses, irrigation systems, and other equipment that may contaminate water or marijuana crops.
- (2) Irrigation systems must be in good working condition to prevent wasting of water and to avoid high soil moisture levels that may contribute to mold and fungal problems.
- (3) If reverse osmosis (RO) and Ultra-violet light systems (UV) or other water quality systems are utilized, they must be professionally serviced in accordance with manufacture's recommendations. Filters, and other parts that come in contact with water must be cleaned and replaced as often as needed to prevent contamination. Maintenance activities must be recorded on the Facility Maintenance Log.

#### Water quality and irrigation checklist.

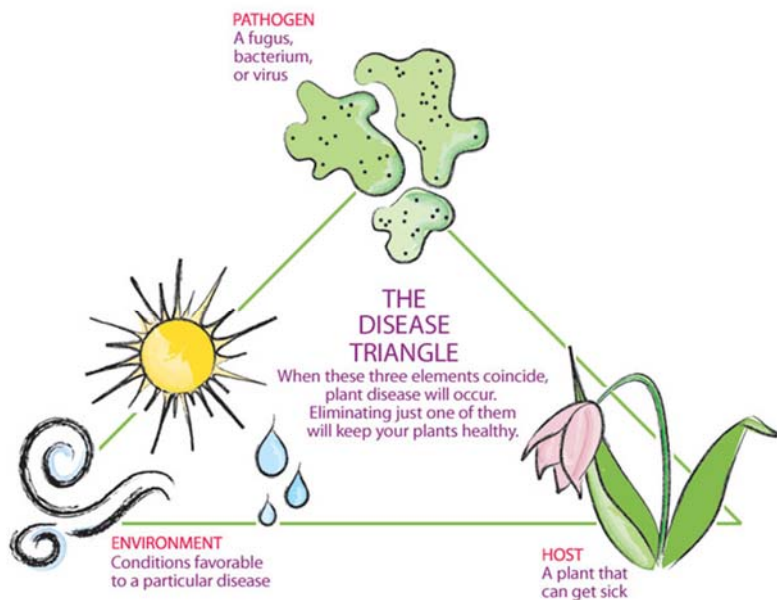
- (1) All employees must be trained on the proper handling and storage of water with a focus on avoiding contamination.
- (2) Water and nutrient solutions should not sit in the open environment for longer than four hours. If agitation and aeration pumps are used in holding containers it may sit in the open environment for no longer than twenty fours.
- (3) Do not drain nutrient solutions into a public drain without confirming with the cultivation manager the disposal is in accordance with applicable laws and regulations and in accordance with the manufacturer's recommendations.
- (4) Disinfect spray nozzles immediately if they come in contact with a contamination source. Keep hoses away from media and compost. Clean hoses as needed.
- (5) Plants should be watered and in a manner that adequately contains the water to avoid run through. Only highly trained employees should be responsible for irrigation. Cannabis has a low crop coefficient and should typically require approximately 5 gallons per 45 sq. ft.
- (6) If automated irrigation systems or flood tables are used, employees must be trained to mitigate for equipment failure.
- (7) Group plants by strains for watering efficiency. Maintain water and nutrient solution application information in the Crop Maintenance Log.
- (8) If municipal water supplies are utilized, the cultivation manager must test quality and nutrients levels quarterly and make necessary adjustment to nutrient solutions.
- (9) Irrigation equipment must be professionally maintained per the manufacturer's recommendations. Any parts that may be a source of contamination must be cleaned and replaced as often as needed.
- (10) Programmable irrigation equipment should be inspected daily to ensure accuracy of applications.

- (11) If plants are flooded or root balls remain in high moisture, careful inspection for Pythium-induced root rot must be performed regularly.
- (12) Check for signs of water quality changes daily including:
- i. Build-up of lime scale indicating high calcium and magnesium or sulfate.
  - ii. Red and black particles and stained fixtures indicating high iron or manganese.
  - iii. Salty taste indicating increased levels of chloride.
  - iv. A rotten odor and tarnished copper indicating sulfides.

## CROP PEST, WEED, AND DISEASE MANAGEMENT PRACTICES

Disease management policy.

The cultivation manager is required to develop, implement, and maintain management practices to prevent crop pests, weeds, and diseases.



Disease management practices.

Acceptable methods of disease management include, but are not limited to:

- (1) Soil, media, and crop nutrient management practices contained herein.
- (2) Sanitation measures to remove disease vectors and habitat for pest organisms.
- (3) Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.
- (4) Pest problems may be controlled through mechanical or physical methods including but not limited to:
  - (a) Augmentation or introduction of predators or parasites of the pest species;
  - (b) Development of habitat for natural enemies of pests; and
  - (c) Controls such as lures, traps, and repellents.
- (5) Disease problems may be controlled through:

- (a) Practices which suppress the spread of disease organisms; or
- (b) Application of biological, botanical, or mineral inputs.

## INTEGRATED PEST MANAGEMENT PRACTICES

Integrated pest management policy.

The goal of integrated pest management (IPM) is to apply a combination of control methods to prevent, reduce, or maintain pest populations at non-damaging levels. Pesticides should only be used as a last resort. The cultivation manager must implement and monitor IPM practices to predict potential levels of crop damage, mitigate risk, and control pests. Early identification of pest infections is crucial. Each cultivation employee must be trained on and responsible for plant inspection and identification. A variety of mechanical, physical, and biological controls must be implemented.

IPM objectives.

- (1) Prevention methods utilized.
  - (a) Cultural practices such as spacing, pruning, and sanitation can help with pest prevention.
  - (b) Ensure there are no open cracks in cultivation areas.
  - (c) Intercropping when growing outdoors.
  - (d) Maintaining a controlled environment.
  - (e) Traps should be used at all times.
  - (f) Pest scouting must be a priority during all other plant maintenance.
- (2) Suppression methods utilized.
  - (a) Cultural practices including pruning and immediate removal of diseased plants.
  - (b) Biological controls.
  - (c) Low dose natural oils.
- (3) Eradication methods utilized.
  - (a) Increase natural oil dose.
  - (b) Increase biological controls.
  - (c) Implement pesticide use.

IPM considerations.

- (1) Current status of infestation.
- (2) Regulatory considerations.
- (3) Public perception.
- (4) Pest and crop life cycle stage.
- (5) Location.
- (6) Size.
- (7) Density.
- (8) Potential to spread.
- (9) Environmental impacts.
- (10) Previous results of measures.
- (11) Measurability.

Acceptable methods of IPM.

Pests may be controlled through:

- (1) Mechanical or physical controls including but not limited to traps, light, or sound; and

- (2) Lures and repellents.
- (3) Substances to prevent or control pests.

Cross-contamination prohibited.

The cultivation manager may use substances to prevent or control pests provided, that, measures are taken to prevent contact of the organically produced products or ingredients with the substance used.

Management practices for the control of pests.

The cultivation manager may implement any practice allowed by the USDA Organic Standards. Regular IPM practices include, but are not limited to:

- (1) Daily monitoring of pest populations;
- (2) Removal of pest habitat, food sources, and breeding areas;
- (3) Utilization of verified “pest-free” supplies;
- (4) Prevention of access to handling facilities;
- (5) Management of environmental factors, such as temperature, light, humidity, atmosphere, and air circulation, to prevent pest reproduction;
- (6) Disposition of infected crops; and
- (7) Evaluation of the cost or prevention in relation to yield and quality improvements.

Recording of substances applied required.

When a nonsynthetic or synthetic substance is utilized to prevent or control pests, the Crop Maintenance Log must be updated to reflect the use of such substances and methods of application. The record must include a list of all measures taken to prevent contact of the organically produced products or ingredients with the substance used. The cultivation manager must ensure the accuracy of log entries.

Certified Applicator required.

If pesticides, herbicides, insecticides, or fungicides, whether from natural or synthetic sources, are used on a crop, only cultivation employees trained by a third-party as a Certified Applicator should apply these at the labeled minimum effective rates.

Pesticide regulations.

- (1) Pesticides include rodenticides, insecticides, bacteria/fungi (beneficial), herbicides, arachnids, miticides, molluscicides, nematocides, growth regulators and others.
- (2) All pesticide applications must be compliant with:
  - (a) Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA);
  - (b) Superfund Amendments Reauthorization Act (SARA);
  - (c) Community Right to Know Act (EPCRA);
  - (d) Occupational, Safety and Health Act (OSHA); and
  - (e) State and local laws.

Label recommendations to be followed.

Application and storage of pest control products must be in accordance with label recommendations and all regulations.

### Beneficial biologicals.

The cultivation manager may implement the use of appropriate biological controls including predatory wasps and mites and nematodes, lacewings, ladybugs, pirate bugs, and others for preventative or mitigation purposes. Release of biologicals is most effective between 60°F and 80°F while death occurs at 100°F. Releases of predatory mites may be localized, en masse, or through row augmentation using edge effect near entries to various rooms. Use of biologicals should be limited to recognized and effective applications.

### General IPM Checklist.

- (1) Cultivation and monitoring practices.
  - (a) Quarantine all new plant material entering the cultivation facility for ten days to two weeks.
  - (b) Document pest populations, record outbreaks, treatment methods, and results in the Crop Maintenance Log.
  - (c) Monitor propagation areas daily. Utilize pest monitoring traps. Record and review the quantity of pest and beneficial insects weekly.
  - (d) Do not reuse media including fiber, soil, perlite or hydroton unless it has been sterilized in a procedure implemented by the cultivation manager.
- (2) Facility maintenance practices.
  - (a) Keep cultivation areas clean, dry, and free of algae and other clutter and trash. Remove pots of unwanted media from cultivation areas immediately.
  - (b) Maintain cracks, window and door frames, drain areas, and floor joints with sealant to limit pest movement.
  - (c) Eradicate any weeds or pest habitats surrounding the cultivation facility.
  - (d) Use appropriate traps and baits on a regular basis and replace as needed.
  - (e) Maintain roads the cultivation facility so they are free of trash and debris that border, irrigate dirt roads to reduce dust and use slow speeds. Overhead irrigation will decrease dust and disrupt the behavior mite populations.
- (3) Biologicals and pesticides.
  - (a) Release biologicals in accordance with instructions.
  - (b) To the greatest extent possible, avoid disruption of biological controls when utilizing organic pesticides.
  - (c) Do not apply any chemical substance to the crop in the final three weeks of the flowering cycle.
  - (d) Turn off air circulation and ensure the ambient temperature is between 59 and 77 degrees. Do not apply foliar water immediately after applying pesticides.
  - (e) Adhere to all Restricted Entry Intervals (REI). Place a notice on all points of egress with name of the substance applied and the allowed time of entry.
  - (f) All cultivation employees must receive basic Worker Protection Standard training. Training must include recognizing the signs of pesticide poisoning.
  - (g) Purchase on demand and use pesticides as soon as possible. Avoid unnecessary storage.
  - (h) Store pesticides grouped by type in designated areas separated from water sources, maintenance chemicals, nutrients, or supplies in a dry, well-ventilated area.

- (i) Dispose of pesticides in accordance with label instructions. Generally, liquid containers must be triple rinsed and punctured before discarding.
- (j) The cultivation manager is authorized to engage necessary services whenever questions about pesticide use or permitting arise.
- (k) Monitor all IPM treatments and record observations in the Crop Maintenance Log.

## FERTILIZERS AND SOIL/MEDIA MANAGEMENT PRACTICES

Soil/media management policy.

The cultivation manager shall implement procedures to maintain or improve soil/media organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Soil and media temperatures should be maintained below 95°F at all times to prevent root rot.

Fertilizer/nutrient policy.

The cultivation manager may implement fertilization methods appropriate for each crop including hand application, ebb and flow systems, and injection systems. Generally, small fertilizer doses should be applied to crops over a determined period of time to avoid over-feeding and burning of the leaves. The cultivation manager shall only utilize fertilizers that are rated food or pure quality. Nutrient solutions, compost teas, and other substance mixtures applied to plants must be prepared by the cultivation manager or a designated, highly trained employee. Each compost collection must be recorded in the Compost Log. Each mixture must be recorded in the Crop Maintenance Log and assigned and labeled with an identification number for application records.

Media selection.

The cultivation manager may utilize any type of media that is safe for cultivation. The cultivation manager should consider the following when selecting plant media:

- (1) Cleanliness;
- (2) Saturation rate;
- (3) Uniformity;
- (4) Availability; and
- (5) Cost and cost of nutrient required.

Media checklist.

- (1) Test media prior to each use.
  - (a) pH = 5.8-6.8
  - (b) Temperature = 65°-70°F
  - (c) Visually inspect for pests.
- (2) Store media tightly sealed and off the ground in a dry location away from cultivation areas.
- (3) Utilize traps for monitoring in and around stored media.
- (4) The cultivation manager must provide media recipes if mixed.
- (5) Do not reuse soil or media unless it has been sterilized.



temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times. The cultivation manager must ensure an accurate Compost Log is maintained for any compost produced by the company.

#### Fertilizer applications.

The cultivation manager must ensure the proper application of chemical fertilizers:

- (1) Apply in accordance with federal, state and local regulations that are applicable to the specific fertilizer, if any.
- (2) Use in accordance with all label directions; for example, for application rates, for safe handling, etc. Generally, a 50% reduction in suggested feeding rates can be implemented in ebb and flow systems.
- (3) Minimize leaching as much as possible. Avoid allowing water or solutions to overflow pots.
- (4) Store chemical fertilizers carefully and according to labels.
- (5) For manure- and/or compost-based fertilizers, monitor for undesirable microbial pathogens through periodic testing that follows approved procedures.
- (6) For manure- and/or compost-based fertilizers that are produced or openly stored on-site, monitor runoff from composting and storage sites.

#### Fertilizer/nutrient solution checklist.

- (1) Ensure that only properly trained personnel with appropriate PPE apply crop fertilizers under the direction of the cultivation manager. Spray tanks must never be left unattended and must be emptied and stored after each shift.
- (2) The cultivation manager must prepare or oversee the preparation of fertilizer solutions. Mixing areas should be thoroughly cleaned and decontaminated after each mixing operation.
- (3) Apply fertilizers at a sufficiently early phase in the crop's cycle to allow for an appropriate interval between application and harvest. This practice assures that the fertilizer has fully broken down before the crop is harvested. The cultivation manager must document any sources of information on fertilizer half-life determinations in the Crop Maintenance Log.
- (4) Apply water-soluble foliar fertilizers within twenty-four hours of preparation. Such prompt use may optimize effectiveness of the application and prevent microbial contamination of the solution.
- (5) Ensure that water used for mixing any soluble fertilizer meets all established criteria for agricultural irrigation water.
- (6) Aerate and agitate mixtures in accordance with manufacturer instructions. Pumps must be maintained as necessary and replaced every six months.
- (7) Test all solutions prior to application for pH/TDS/EC prior to each application. Apply fertilizers in a manner that does not contribute to contamination of water.
- (8) All fans must be turned off for foliar applications and the ambient temperature in the cultivation area maintained between 59-70°F during fertilization operations.
- (9) Equipment and containers used to hold fertilizer solutions must be cleaned using a triple rinse protocol.



Compost teas and materials.

Compost teas and compost materials can result in positive coliform results if improperly applied to crops. Cultivation employees who apply compost must be properly trained in safe application to prevent contamination of the plant foliage.

Chemigation systems.

All chemigation systems used in the facility must be professionally maintained in accordance with the manufacturer's recommendations. Back flow prevent devices must be installed on all incoming water sources. The cultivation manager must inspect the chemigation system daily to ensure it is in good working order.

## HANDLING, PROCESSING, AND STORAGE - GENERAL

Handling, processing, and storage policy.

The cultivation manager in coordination with the processing manager must develop, implement, and maintain handling and storage measures that prevent spoilage, molding and other damage to the crop while preparing it for distribution. Storage activities must be properly recorded and comply with the procedures detailed in the Product Storage and Transportation Plan.

Types of handling, processing, and storage activities.

Allowed handling, processing, and storage activities include curing, drying, mixing, grinding, churning, separating, extracting, freezing and packaging, or storing in bulk containers.

## PROCESSING PRACTICES

Processing policy.

The cultivation manager in coordination with the processing manager shall develop, implement, and maintain processing practices that protect crops from contamination and maintain the quality of the marijuana.

Scheduling harvest activities.

- (1) The cultivation manager shall schedule harvests with the processing manager when the crops are in a condition that will result in a harvest that meets quality requirements. Factors including the life cycle stage of the plants and measured constituent levels (obtained from pre-harvest testing) should be considered, if applicable.
- (2) Harvest operations should take place early in the lighting sequence whenever possible for optimal essential oil preservation.

Processing – regulatory requirements.

All marijuana must be processed in a safe and sanitary manner. Processed marijuana plants must be:

- (1) Well cured and free of seeds and stems;
- (2) Free of dirt, sand, debris and other foreign matter;
- (3) Free of contamination by mold, rot, other fungus, and bacterial diseases;
- (4) Prepared and handled on food-grade stainless steel tables; and
- (5) Packaged in a secure area under surveillance.

Processing practices.

- (1) All processing operations must be performed in limited access areas with full surveillance camera coverage in accordance with the Security Plan.
- (2) During processing operations, crops must be protected from:
  - (a) Moisture during harvest, handling, and storage to minimize growth of yeasts and molds; and
  - (b) Contact with rodents, insects, and other pests to prevent contamination.
- (3) During harvest operations crops must be moved to the trim area as soon as possible after harvest to prevent degradation of the crop.
- (4) Harvest containers must be maintained at levels so that no compacting of harvested marijuana occurs.

Processing personnel.

Only trained cultivation employees under the direct supervision of the cultivation manager or processing manager may perform processing operations. The cultivation or processing manager is responsible for verifying all processing data including batch numbers, yields, waste weight, etc.

Harvest records required.

The cultivation manager, in coordination with the processing manager, is responsible for the entry of harvest information into the inventory management system and processing information in the crop processing log in the Crop Maintenance Log.

- (1) Harvest records, at a minimum, must include:
  - (a) The quantity of the harvest;
  - (b) Dates of planting and of harvest;
  - (c) A precise description of the cultivation site;
  - (d) The life cycle stage of the crop at the time of harvest;
  - (e) Relevant crop conditions throughout its cultivation; and
  - (f) Beginning and ending processing weights of each batch.
- (2) Processing records should be logged in the crop processing log, Crop Maintenance Log and at a minimum, must include:
  - (a) The identification of the facility area in which any processing operation was undertaken for each crop including relevant information about pest control plans and cleaning procedures for the area.
  - (b) A description of equipment used in all processing operations describing the equipment used for each processing operation and information about equipment maintenance. Equipment information be sufficient to demonstrate the condition of the equipment at each harvest.
  - (c) Relevant information to identify the water source for processing including logs and procedures must be sufficient to demonstrate the water quality at each harvest.
  - (d) A list of each employee working in each processing operation. Relevant information about employees including logs and procedures should be sufficient to also describe the steps that are taken to ensure worker safety and hygiene.

- (e) Documentation of drying conditions and times; beginning and ending moisture content of each crop; and any additional information relevant to the drying process. Beginning and ending weights of each crop shall be maintained in the inventory management system.
- (f) The inventory records shall reflect the specific identification of plants that were harvested for processing operations; the date of operations; the beginning and ending weights of each harvest; with sufficient detail to allow trace-back of any packaged lot to its specific cultivation history.
- (g) The inventory management system must record transfer and transportation records, with sufficient detail to trace distribution of each crop, if necessary, throughout the chain of custody, from the cultivation facility to the buyer(s) who receive(s) any portion of the crop.

#### Batch IDs required.

The processing manager must assign a lot/batch number or other identifying code generated by the inventory management control system to each batch harvested. Final batches should not weigh more than twenty pounds for weight trim operations and five pounds for dry trim operations. Batch identification numbers must remain with each harvest throughout processing.

#### Processing equipment.

- (1) The cultivation manager in coordination with the processing manager shall ensure all equipment used for harvesting, trimming, curing, or storage is made of non-toxic and non-corrosive materials.
- (2) All equipment must be inspected by an employee to ensure it is in proper working order prior to each use; repairs must be made as necessary.
- (3) Equipment must be maintained in a clean condition ensuring that all parts that come in direct contact with the crop during processing are clean and free of potential contaminants.
- (4) Remnants of any prior processing activity must be removed from equipment prior to each use to prevent cross-contamination.
- (5) Harvest containers may not be used for storing or holding non-harvest materials, such as tools or chemicals. Containers must be cleaned and sanitized prior to use in each harvest.
- (6) All necessary personnel must be properly trained in the use of processing equipment, especially mechanized equipment.
- (7) Equipment must be operated in a manner that ensures the safety of the operators and avoids or minimizes damage to the harvested material.

## DRYING/CURING PRACTICES

#### Drying/curing policy.

The cultivation manager in coordination with the processing manager is responsible for implementing and maintaining drying and curing practices that protect crops from contamination and maintain the quality of the marijuana.

Drying/curing practices.

- (1) Drying/curing areas are restricted to the general manager, cultivation manager, and processing manager.
- (2) All drying/curing operations must be performed in limited access areas with full surveillance camera coverage in accordance with the Security Plan.
- (3) Drying/curing areas must be maintained to ensure that there is sufficient ventilation for airborne moisture to escape providing adequate air circulation throughout the drying area and sufficient odor mitigation.
- (4) Harvested material shall be placed on clean food-grade surfaces that afford adequate air circulation.
- (5) If heaters or other sources of artificially generated heat are used in the drying operation, adequate ventilation of the heating equipment shall be provided and only fuels that will not result in hazardous combustion emissions coming into contact with the crop and thereby contaminating the material will be utilized.
- (6) If using mechanical drying equipment, such as belt, drum, rotary, or oven-tray dryers are used, all manufacturer instructions and established operating procedures must be followed to ensure that quality of the material is maintained.

## PACKAGING, LABELING, AND STORAGE PRACTICES

Packaging, labeling, and storage policy.

The cultivation manager in coordination with the processing manager must develop, implement, and maintain packaging, labeling, and storage practices that prevent crop contamination, protect the quality of the marijuana, and properly identify all batches.

Labeling and packaging bulk marijuana.

The cultivation manager, in coordination with the processing manager, must accurately identify and label all marijuana transferred to bulk storage containers. Packaging of bulk marijuana must be in food safe bags or containers approved by the cultivation manager. Labeling and packaging must comply with applicable procedures in the Packaging and Labeling Plan.

Storage practices.

- (1) Storage areas are restricted to the general manager, cultivation manager, and processing manager.
- (2) Storage must comply with procedures in the Storage and Transportation Plan.
- (3) The cultivation manager must approve and witness the transfer of marijuana from the drying/curing area to storage.
- (4) Storage areas must have full surveillance camera coverage in accordance with the Security Plan.
- (5) Bulk packaged crops are to be stored in cool, dry areas away from direct sunlight and exterior walls and off the ground in containers that protect against excessive exposure to air, light, and moisture.
- (6) Crops shall not be stored in the same area with any non-crop items (i.e. cleaning supplies, nutrients, etc.).
- (7) The manager shall verify the weights of all harvested crop prior to storage.

## CULTIVATION SAFETY PRACTICES

Emergency preparation.

The cultivation manager must post and maintain an emergency contact list posted throughout the facility. All cultivation employees must be properly trained in department specific Incident Response in accordance with the Training Plan and Incident Response Plan. Contacts include:

- (1) Cultivation manager
- (2) Management team members
- (3) Fire response
- (4) Law enforcement
- (5) Poison control
- (6) Ambulance
- (7) 911- which can also activate the Spill Response Team

Cultivation safety policy.

The safety of our employees is Greenbelt Management's first priority. The cultivation manager must identify and mitigate department specific safety considerations. Cultivation facilities have a high risk for electrical hazards, low-toxicity pesticide, and mold contamination. The cultivation manager, in coordination with the general manager, shall schedule regular infrastructure and equipment maintenance in order to reduce fire risk and other potential hazards. Other than electrical hazards, few exposures in a cultivation facility are expected to cause significant exposure risks. Safety procedures shall develop a culture of safety in the cultivation facility.

Training and compliance with other safety policies.

All cultivation employees must receive department appropriate safety training and comply with all safety practices found herein and the in the Safety Plan as a condition of employment.

Material Safety Data Sheet (MSDS) documentation.

MSDS sheets for all chemicals used in the cultivation facility must be organized, accessible to all cultivation employees, and placed in multiple locations.

Fire safety.

Flammable materials must be stored in a fire locker and properly labeled for first responder identification. All areas of egress should be properly signed in accordance with NFPA 704 standards. The facility must comply with all local fire codes. Fire extinguishers must be maintained annually. All cultivation employees must be properly trained in fire prevention and mitigation measures.

Personal protective equipment (PPE).

- (1) The cultivation manager must implement and maintain a PPE program. The program must be compliant with OSHA and EPA standards and address:
  - (a) Hazards present;
  - (b) Selection, maintenance, and use of PPE;
  - (c) Training; and
  - (d) Monitoring.
- (2) Cultivation employees must be provided appropriate personal protective equipment and training and trained in decontamination procedures.

- (a) Upgraded PPE must be immediately provided if any change in facility status results in dangerous exposures to cultivation employees.
- (b) Standard PPE required for all cultivation employees includes:
  - Accessible eye wash stations with sufficient quantities of potable water.
  - Uniforms with some level of fire resistance.
  - Chemical resistant gloves.
  - Boots with water resistance and slip protection.
  - N-95 or P-100 disposable respirators.
  - A full-face air purifying respirator with a minimum of a P-100 filter, fitted by a qualified professional, is required for employees with beards or performing substance spray applications.
  - Tyvek coveralls for employees performing substance spray applications.

Chemical spill response.

- (1) All cultivation employees must be appropriately trained on spill response. Every employee is responsible for participating in spill response activities.
- (2) A fully stocked spill kit must be maintained in the cultivation facilities. Areas with high spill risk should be stocked with a mobile spill kit for immediate mitigation.
- (3) Inform the cultivation manager immediately. The cultivation manager or general manager must notify necessary parties.
- (4) The cultivation manager shall determine the severity of the spill and the toxicity of the chemical and execute the appropriate response.
- (5) Remove all non-critical employees from the spill area and address any immediate medical needs.
- (6) Contain the spill. Use necessary PPE. Containment solutions include absorbents and rubber dams.
- (7) Place necessary notifications at areas of entry to the spill area.
- (8) Dispose of all hazardous waste in accordance with manufacturer instructions and state and local laws.
- (9) Decontaminate the spill area in accordance with the MSDS and manufacturer instructions.

## CULTIVATION SANITATION AND QUALITY CONTROL PRACTICES

Sanitation and quality control policy.

The cultivation manager must develop, implement, and maintain sanitation and quality control practices that maintain the safety and quality of crops, including purity and consistency.

Cultivation environment.

All necessary precautions must be taken during the cultivation and processing of marijuana to prevent contamination of marijuana and packaging materials. These safeguards include, but are not limited to:

- (1) Cleaning and sanitizing all equipment, containers, and other contact surfaces as necessary;
- (2) Controlling airborne contamination;
- (3) Using sanitary handling procedures;
- (4) Washing or cleaning containers and packaging components that contain soil or other contaminants;
- (5) Using safe water in all operations;

- (6) Performing chemical, microbiological, or other testing, as necessary to prevent the use of contaminated ingredients in cultivation and processing operations;
- (7) Sterilizing, pasteurizing, freezing, refrigerating, heating, pressurizing, controlling hydrogen-ion concentration (pH), controlling humidity, controlling water activity (aw), or using any other effective means to remove, destroy, or prevent the growth of microorganisms and prevent marijuana product decomposition;
- (8) Storing packaging materials, in-process marijuana, and marijuana products appropriately to prevent contamination and adulteration;
- (9) Preventing cross-contamination and mix-ups between contaminated or adulterated marijuana and clean marijuana; and
- (10) Using effective measures to protect marijuana products against adulteration by plastic, glass, metal, or other foreign materials when at risk due to processing equipment or materials.

Quality control measures in cultivation operations.

The cultivation manager must establish surveillance schedules for each crop in cultivation. Detailed visual surveillance of each crop must be performed and documented weekly at a minimum. Cultivation employees performing surveillance must look for and record findings for the cultivation area assigned.

The following items should be included in surveillance operations:

- (1) Signs of pest infestations.
- (2) Changes in biological colonies.
- (3) Mold and mildew.
- (4) Leaf and tip burn, discoloration, and spotting.
- (5) Changes in appearance of the media.
- (6) Changes in stalk density and branch elasticity.
- (7) Regular in-house testing must be scheduled by the cultivation manager based on current operational needs and recorded in the Crop Maintenance Log. Tests that must be performed include:
  - (a) Soil pH.
  - (b) Nutrient pH, Total Dissolved Solids (TDS), and Electro-Conductivity (EC).
  - (c) Soil EC/pH testing using a saturated media extraction (1 part soil to 2 parts water filtered) or the leachate pour-through method.
  - (d) Water Oxidation Reduction Potential (ORP).

Quality control measures in processing operations.

- (1) The cultivation manager must ensure that all crops are evaluated during processing and tested in accordance with the Quality Control and Product Recall Plan.
- (2) Cultivation employees working in processing operations must be trained to identify signs of contamination and sub-standard product. The cultivation manager must approve the disposal of any crops.
- (3) Two or more trained employees must perform a visual microscopic and naked-eye inspection of each crop processed to determine:
  - (4) Organoleptic characteristics (color, texture and odor);
  - (5) Presentation of the material (raw, cut, crushed, compressed);
  - (6) The presence of admixtures, foreign matter (sand, glass particles, dirt), mold, or signs of decay;
  - (7) The presence of insects; and
  - (8) The presence of foreign material originating from poor or degraded containers.

- (9) All crops are to be inspected by two or more trained employees for all visible foreign matter and sub-standard material to be removed.
- (10) Foreign matter includes:
  - (a) Plant material from other strains/species or from other parts of the harvested strains/species;
  - (b) Soil and rocks;
  - (c) Insects; and
  - (d) Wire, glass, paper, tools or tool parts, and other man-made objects.
- (11) Sub-standard material includes, for example:
  - (a) Discolored leaves or flowers;
  - (b) Evidence of mold; or
  - (c) Any other material that would cause the crop to fail to meet its specifications as determined by the general manager or cultivation manager.
- (12) The inspection for foreign matter and sub-standard material must be conducted while the crop is sufficiently well displayed on a sanitary surface by two or more employees to allow for sufficient visibility (e.g., on a conveyor, or spread out on tables, screens, or tarps).
- (13) Damaged and/or degraded plant material must be removed and disposed of with cultivation manager approval and in accordance with the Inventory Management and Waste Disposal Plan.

#### Representative and analytical samples.

- (1) Representative samples sufficient in size shall be taken from each batch (each strain must be tested) by the cultivation manager or testing lab representative.
- (2) Analytical samples must be taken in accordance with the Quality Control and Product Recall Plan.
- (3) Representative samples must be properly recorded in the inventory management system and held in a secured storage area for one year.
- (4) Sample records must accurately reflect the origination of the sample to allow trace-back.
- (5) Samples shall be labeled with the contents by the plant name and identification; the date of harvest; the identification number; and any other identifying information and stored separately from product inventories in a manner that maintains sample quality and identification.

#### Pest control procedures.

The cultivation area must be designed, maintained, and monitored to restrict pests, including insects, rodents, and other animals. The cultivation manager must ensure that pest management activities comply with procedures found in the Facilities and General Operations Plan.

#### Facility sanitation practices.

- (1) The production manager must maintain written procedures assigning responsibility for sanitation and describing in sufficient detail the cleaning schedules, methods, equipment, and materials to be used in cleaning the production area; such written procedures must be followed, and records of cleaning and sanitation must be kept in the Facility Maintenance Log.
- (2) UV sterilization door strips and dip tanks should be used in critical locations throughout the facility.
- (3) Frequent hand-washing is necessary in all crop handling activities and must be enforced by the cultivation manager. Cultivation employees that do not comply with hand-washing requirements may be terminated.



- (4) All cultivation employees are responsible for the sanitation of cultivation areas. All critical areas must be clean and free of any contamination risks at the end of each shift.
- (5) Any mold found in the facility must be addressed by a mold removal expert immediately.

Waste disposal.

All marijuana waste from cultivation operations must be disposed of in accordance with the Inventory Management and Waste Disposal Plan. All other cultivation waste must be stored and disposed of as to:

- (1) Minimize the development of odors;
- (2) Minimize the potential for waste to attract, harbor, or become a breeding place for pests;
- (3) Protect against contamination of marijuana, contact surfaces, water supplies, and grounds surrounding the facility; and
- (4) Control hazardous waste to prevent contamination of marijuana, contact surfaces, water supplies, and grounds surrounding the facility.

## CULTIVATION MONITORING AND RECORDKEEPING

Cultivation manager responsible for monitoring and recordkeeping.

- (1) The cultivation manager must monitor the daily operations of the cultivation facility. Any practice or procedure that results in non-compliance, inefficiencies, or sub-standard marijuana products must be revised and the necessary retraining scheduled.
- (2) The general manager must approve recommended procedural changes.
- (3) Cultivation records must at a minimum:
  - (a) Fully disclose all activities and transactions of the cultivation operation in sufficient detail as to be readily understood and audited;
  - (b) Be maintained for no less than 5 years;
  - (c) Be sufficient to demonstrate compliance with applicable regulations; and
  - (d) Be made available for inspection and copying during normal business hours by authorized representatives of the business, law enforcement, and the Department.
- (4) Inventory records must include the quantity of medical marijuana at the cultivation facility including the number of plants being cultivated on a daily basis as outlined in the Inventory Management and Waste Disposal Plan.
- (5) Disposal records must include the disposal method used for any medical marijuana that was cultivated or acquired but not sold, including evidence of the disposal of the medical marijuana in accordance with the Inventory Management and Waste Disposal Plan.

Crop records.

The manager shall maintain sufficient crop maintenance records utilizing the inventory management system and cloud based logs as described herein for each crop including:

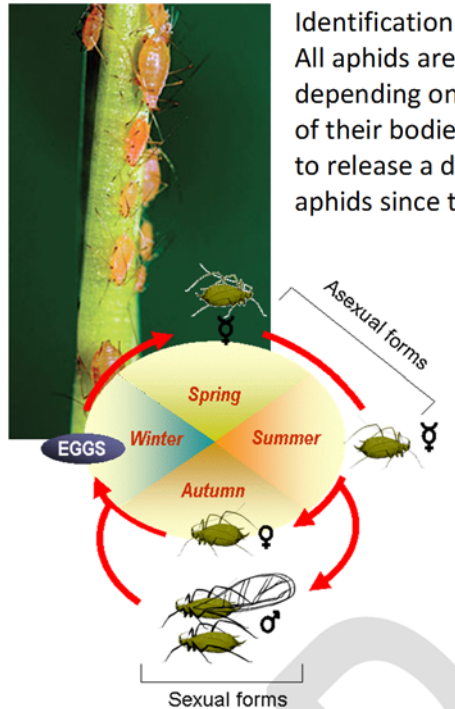
- (1) The identity and source of all propagation material, with sufficient specificity to ensure that the material conforms to all established standards and can be traced to its source. Make such records whether material is obtained from an off-site source or produced on-site.
- (2) All fertilizers used on each agricultural crop and, if applicable, steps taken to monitor manure- or compost-based fertilizers for undesirable microbial pathogens and to monitor water quality from sites where composts are produced or stored.

- (3) Information about water sources and equipment used in irrigation systems, as well as records of all tests performed to monitor water supplies used in irrigation and any records that establish conformity to applicable irrigation regulations.
- (4) Steps taken to protect and maintain crops, including, at a minimum, a record of all pesticides, herbicides, insecticides, or fungicides used on each crop.
- (5) Processing and harvest records consisting of, at a minimum, the quantity of the harvest; dates of planting and of harvest; processing details, a precise description of the agricultural site; the life-stage of the crop at the time of harvest; and other relevant crop conditions throughout its cultivation.

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## EXHIBIT: DISEASE IDENTIFICATION GUIDES

### Aphids



#### Identification

All aphids are small pear-shaped insects that can range in many different colors depending on the species. Most aphids have two points extruding out the rear of their bodies and antenna. These two points are called cornicles and are used to release a defensive liquid. The two points are the most unique trait about aphids since there are not many insects with similar features. They also have

long thin legs. The body is broken up into a few main parts: antenna, thorax, abdomen, cornicle, and cauda. There are different sizes, types, and variations of aphids but all can be differentiated by using a hand lens or microscope. Most aphids are wingless but there are few winged species. There is a large variety of species with different sizes and colors but they all have the pear body and thin legs.

#### Biology

Aphids reproduce very rapidly under optimal climate conditions but reproduce constantly. They reproduce asexually and so there is no pupal stage. The baby aphids develop inside the female parent until they are ready to be born. Populations increase rapidly since the parent is pregnant most its life and there is no hatching process since it does not lay eggs. Aphids can give birth up to twelve offspring or nymphs per day or eighty per week. In warm conditions they reproduce faster and can go from a nymphal stage to a reproducing adult in about seven days. Once you see an adult aphid it has probably given birth at least once. The nymphs molt four times before becoming full adults. Aphids cause the most damage when the temperature is about 65-80°F but once a population gets started the increase in population must be attended to immediately.

## Damage



Most aphids cause curling and yellowing of the leaves but there is variations of damage done by different species. Both nymphs and adults feed on the plant material which interrupts the balance of growth hormones. The aphids puncture a phloem vessel and the pressure inside pushes the food into the aphids mouth. They can also feed on xylem sap but it is deluded and is not pressurized. The aphids also produce sticky honeydew which is found on leaves and can grow mold. Certain species of aphids can inject a toxic compound into the plant causing tissue distortion. This distortion is known as a gall and can look like an unusual swelling of the tissue. Aphids are also known to be vectors to some viruses for specific plants. Green peach aphids are vectors to over a hundred viruses.

## Biological Controls



Since aphid colonies are usually in high population number actions must be taken quickly and drastically. Parasitic wasps are the most important since they lay eggs inside the aphids which kills them. The only problem with parasitic wasps is that as the temperature warms the regeneration time slows for the wasp but increases for aphids. Other predators that can be used for aphids are lacewings, lady beetles, crab spiders, and syrphid flies. Beneficial fungus can be used so that when an aphid rubs

on a spore it sticks to them and germinates. It then breaks through the skin of the aphid and kills it in about three days. Once the fungus fully kills the aphid it then releases more spores repeating the process. Heat can also help by eliminating the bacteria that makes aphids infertile.

## Other Management Strategies

Cultural control practices can help by checking your surrounding are before you plant while maintaining a clean environment. Aluminum foil mulches have also showed positive results from aphid transmitted viruses.

## Mildew

### Identification

#### Powdery Mildew



The first signs of powdery mildew are small spots located on the tops of the leaves. Once the spotting is discovered, the mildew has been present in the plant for at least a week. It most commonly first appears on the tops of leaves. However, mildew can be found on any part of the foliage including the stem.

#### Downy Mildew

Downy mildew presents as a greyish color on the underside of the leaf. The top of the leaf will have a yellowish white color in a spotted pattern.



### Grey Mold (Botrytis)

Grey mold is typically found when humidity is consistently above 50%. It has a greyish color that can become slimy as it progresses. It most commonly attacks the bud. The grey can also turn a dark brownish color in some cases. Botrytis can also be transmitted via seed. There are two forms of grey mold. One is very dark brown or black which is called a sclerotia. The sclerotia is a multi-celled version of the fungus but there is also a single-cell thick dark version called chlamyospores.

### Biology

The fungus can produce 60,000 or more spores on a piece of plant tissue the size of your small fingernail. Spores can travel by wind or also in water. Spores can be produced in less than 48 hours.



### Mites

#### Identification

#### Two Spotted Spider Mite (*Tetranychus urticae*)

Spider mites can be found on a variety of plants. Reddish green markings on the stem or leaflets can be a possible indication of spider mites. Other indicators include webbing under leaflets or stippling. Inspection requires a hand lens or microscope for proper examination to identify on the underside of the leaflet for a clear or cream colored tiny oval about .14 mm. The spider mite starts as a clear form and then gains a cream color. Larvae have three pairs of legs with red eyes. The first signs of pigment do not begin until they start to feed, which gives their bodies a green color and their red eyes also darken. As spider mites proceed in their lifecycle, they will develop black spots on the back mid area. These black spots can help identify the mites status in the lifecycle and determine its species when paired with the red eyes. Once the mite has developed into a protonymph it will have four pairs of legs and are larger with darker color. Even though there are discrepancies between the two; both sexes have two black spots on their back.

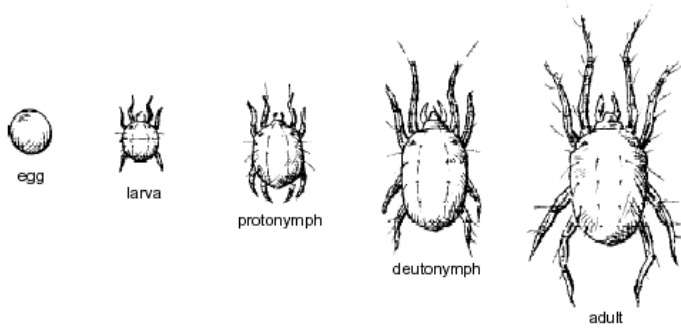
#### Russet Mites (*Aculops lycopersici*)



Russet mites have the same lifecycle as the spider mite, which is an incomplete metamorphosis. A major difference between the two stages is the fact that the russet mite has only two legs its entire life. The russet mite is so small that it does not have any eyes, heart, respiratory tubes, or circulatory system. They have tiny jagged mouth parts for piercing and sucking. They also lay their eggs in colonies; the egg size is about .005mm compared to spider mites .14mm egg. Eggs are usually found on leaf surfaces, veins, or hairs. Russet mites are usually found at the bottom of the plant but do not create webs.

### Biology

## Two Spotted Spider Mite (*Tetranychus urticae*)



*Tetranychus urticae* have piercing sucking mouth parts that are used to pierce and suck the foliage, resulting from a clear to green body. The life cycle of the two spotted spider mite consists of five developmental stages. First starts as an egg and then emerges as a larva and is on its way to be a protonymph. The larva has three pairs of legs and is usually clear with two dark red eyes. Once the larva

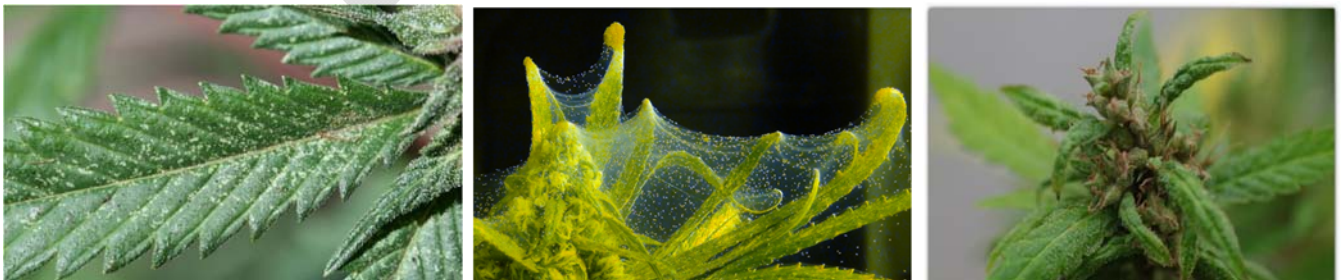
starts to feed it will develop color and then it develop into a protonymph. During these two stages the mite tends to have an active period and a resting period. The active period occurs before molting in a resting stage. As the mite molts it becomes a deutonymph. The deutonymph stage reveals the sex. As it reaches adulthood there are different characteristic traits for each sex. Female adults have an oval body but can range in color from orange, yellow, green, red, or brown. Males are smaller and more active with a slender pointed body that also ranges in color from yellow, orange, and brown. The two spotted spider mite prefers hot dry weather of mostly summer months. Females will hibernate in the ground, bark, trees, or shrubs if trying to survive the winter. The total egg to egg ratio at 15°C is 36.4 and 7.3 at 30°C. The adult female can lay several hundreds of eggs and live about two to four weeks. If living in optimal conditions, the spider mite can complete a full development cycle in five to twenty days.

## Russet Mites (*Aculops lycopersici*)

Russet mites have the same five stages of a life cycle; egg stage, larva stage, two nymphal stages, and an adult stage. The russet mite has only two legs through the entire lifecycle. Optimal climate is 30% humidity and 27°C for a russet mite. The total time it takes for development from egg is one to two weeks depending on the climate conditions.

## Damage

Spider mite damage is caused by the tiny piercing sucking mouth part that punctures into an individual cell and sucks out the inside leaving a white/yellow mark on the leaf. When a plant is infested with spider mites, the entire plant will look a yellowish color. A plant's yield will reduce from mite feedings and may potentially die. Mites can also transfer viruses since they feed on other plants. Russet mites also pierce and suck out the nutrients out of the cells similar to the spider mite but the color after is a bronze shaded. The infected part of the plant will become brown and fragile and can even snap. Warm temperatures can affect the damage spots by drying them out faster which this speeds up the damage process.



## Biological Controls

The predatory mite, *Phytoseiulus persimilis*, is recommended for treatment of pacific spider mite and two spotted spider mite. This small orange spider is similar in size compared to the two spotted spider mite adult but eats about a dozen spider mites eggs per day. This predatory spider is mostly used in greenhouses and low crops since they are best suited for warm humid climates. Another predatory mite is the *Amblyseius californicus* which is also beneficial in eliminating spider mite colonies. Population growth in *A. californicus* is better in warm dry conditions compared to the *P. persimilis*. Temperature change has an impact on *T. urticae* egg population which directly affects the *P. persimilis* since they need more than just pollen to survive. Therefore, the *P. persimilis* is better in larger populations, since they can only feed on spider mites. Russet mites also have biological controls including predatory mites, soaps, and oils that can be used to treat your problem.

## Other Management Strategies

Pesticides are available to treat spider mites, but they are not as effective. There are very few quality pesticides for this application since they do not attack the eggs requiring regularly scheduled spays to ensure new batches of larva are eliminated.



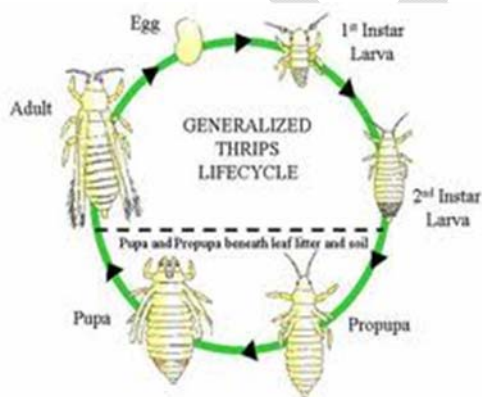
## Thrips

### Identification

Western flower thrips, *Frankliniella occidentalis*, are four wing tiny insects that damage plants by feeding on the leaf and stem tissue. The western flower thrip has a six stage lifecycle: egg, first instar, second instar, prepupa, pupa, adult. Streaking, spotting or tissue damage are indicative of a thrip infestation. The thrip has a rasping

sucking mouth which is used for inserting their eggs into the plant tissue and eating foliage. Western flower thrip adults have clear wings which are nearly veinless and have dark, hairy, fringes. Adult males are light yellow, while adult females are slightly larger than the males and range from light yellow, yellow with brown, to dark brown. The three color variations are seen in different times through the year. The brown thrip has an orange thorax and is seen throughout the year while others are seen only at certain times of the year and in winter.

## Biology



The western flower thrip can lay up to 150 to 300 eggs in its lifetime. An adult first lays an egg inside the leaf or fruit by piercing it with its mouth. The first instar nymph is a very small translucent larvae with red eyes. The second stage instar nymph which becomes more active and grows in size. It will keep feeding until after the second larva stage when the thrip is a prepupa. As visible wing stumps form it drops off of the plant. Western flower thrips pupate in soil or flowers. Wing stumps start to form as it becomes a pupa and then as an adult finally grows wings. This process takes thirteen days on average.

## Damage



Thrips have rasping sucking mouth parts which are saws for teeth. The *Frankliniella occidentalis* feed on new vegetative growth but mostly feed on flowers. Since thrips feed on the buds, they can abort fruit, be misshapen, or leave silvery leaf scars. They tend to feed along the veins of a plant leaving streaking and spotting. Thrip feeding can also show black spots of excrement in feeding areas. The western flower thrip can be a vector to diseases like the tomato leaf curl virus and impatiens necrotic spot virus that can cause death or decreased crop production.

## Biological Controls

There are a variety of effective predators for thrips. Frequently used beneficials include minute pirate bug, *orius tristicolor*, *neoseiulus cucumeris*, and *hypoaspis miles*. Controlling thrips is possible with solid IPM protocols using insecticides and biological controls together. The two types of mites, *neoseiulus cucumeris* and *hypoaspis miles*, are typically released on the soil to prevent thrips transferring from one plant to another. Entomopathogenic fungi is another helpful biological control where the fungi attaches itself to the insect as a spore and then the spore generates grows in the cuticle.

## Other Management Strategies

Chemical control can also be used, spinosad is currently an effective chemical registered against western flower thrips. However, some chemicals cannot be used with certain biological control agents or in certain regulatory environments. Thrips are attracted to blue sticky cards.

## Whiteflies

### Identification



Whiteflies are one of the most common pest in crop production. There are a few different species of whiteflies but two of the most common are Silver Leaf Whitefly, *Bemisia argentifolii*, and Greenhouse Whitefly, *Trialeurodes vaporariorum*. Whiteflies are mostly know for the ability to transfer viruses throughout a crop. Adults are about 1.5mm long and are yellow in color with white wings. Both species are found on the underside of leaves. Most whiteflies adults will fly away when the plant is disturbed. The eggs can be located anywhere on the underside of the leaflet and can also be seen with a close naked eye inspection. A hand lens

should be used for better observation. A silver leaf whitefly adult has wings that are slightly tilted with a gap separating them. The greenhouse whitefly wings are set a little flatter and do not have a gap between them.



## Biology



Whiteflies start as eggs under a leaflet and go through a six stage lifecycle. After the egg hatches a crawler emerges with legs and an antennae. The crawler then molts and emerges without its legs and antennae. This stage is the second instar nymph stage. In the third instar nymph stage it grows a little larger. The fourth instar nymph stage or pupa stage is the last stage before becoming an adult and the stage when the type of whitefly can be identified. Greenhouse whitefly pupas are round and have a transparent yellowing to its structure. Silverleaf whitefly pupas have an oval shape but the main distinctive characteristic is the wax threads projecting out of the pupa. The

last step of the lifecycle is adulthood; when the whitefly emerges it leaves a "T" shaped tear. This tear allows identification between parasite and whitefly emergence. There is a gap between the wings on the silverleaf whitefly which is used as a species indication. The silver leaf more triangular when compared to the greenhouse whitefly. The greenhouse whitefly is smaller, more yellow, and more elongated with wing gap. The silverleaf has a shorter lifespan at higher temperatures with an optimal climate of 20°-25°C. Greenhouse whiteflies survive longer in higher temperatures with an optimal climate of 25°-30°C. Adult whiteflies can live for one to two months.

## Damage

Types of damage exerted by whiteflies can range from a minimal threat to crop failure. Whitefly feedings can cause leaves to curl and yellow. After they have ingested plant sap they leave honeydew droppings on the plants from the processed sugar. The honeydew is sticky and black, a negative indicator in any crop production, and can cause quality fruit loss. However, the honeydew can grow



mold on it which is the most severe issue. Feeding by the silverleaf whitefly can cause the fruit (buds) to ripen unevenly. Greenhouse whiteflies are vectors to some viruses including the yellow tomato leaf curl virus and tomato chlorosis virus.

## Biological Controls

Whitefly nymphs can be controlled by a few different biological beneficials including encarsia, eretmocerus, bigeyed bugs, lacewing larvae, and lady beetles. The most recommended beneficial for whitefly applications is the parasitic wasp, *Encarsia formosa*. *Encarsia f.* should be released as soon as a whitefly problem is discovered. Predatory beetles like *Delphastus pusillus* can also be very successful against large populations of whiteflies also.

## Other Management Strategies

Insect pathogens such as funguses can help whitefly infestations by infecting the pest through the cuticle of the plant. Cultural controls can also be helpful in containing the pests in one area making sure to decrease dispersal. A clean environment is essential in all IPM practices.

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EXHIBIT: CROP MAINTENANCE LOG

\*This form should be completed [online](#).

# Crop Maintenance Log

## Application Log

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**READ WARNING LABEL AND MIXING INSTRUCTIONS EVERY TIME**

Date:

Name of substance:

Name of manufacturer or batch ID number for in-house mixtures.

List active ingredients/composition:

Include pH/TDS/EC readings - to be performed prior to each application.

Enter amount or rate of substance applied:

Enter organic status verification:

For water applications, identify the water source and location.

i.e. Holding tank - Veg Room 2, Tap - Maintenance Room, Hose - Flower Room 1.

Name of employee(s) who performed application:

Why was this application used?

Explain how the application was done:

i.e. soil injection, foliar spray, etc.

Explain in detail where and to which crops the application was done (Table or Lot)?

Commercial availability:

Additional comments:

Signature

**Plant Inspection Log**

---

Employee name:

List cultivation areas inspected:

Area of Concern	Symptoms Identified	Actions Taken	Follow-Up Required
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>


Signature

**Mixture Log**

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**ALL MIXTURES MUST BE PREPARED BY THE CULTIVATION MANAGER OR DESIGNATED EMPLOYEES**

Date:

Manager name:

Employee name:

- Type of mixture:
- Nutrient formula
  - Compost tea
  - Pesticide formula
  - Rooting/cloning solution
  - Other

List ingredients and quantities.

List application instructions.

Provide expiration date and time.

Assign batch ID number:  
YYMMDD\_Initials\_00 (# of total batches mixed)  
i.e.: 131105CM01 and 131105CM02

\*Label all containers with the type of mixture, batch ID, and use by date and time.

Signature

### Crop Processing Log

---

Date

Manager Name:

Provide details about the crop processing activity, including names of the employees present during the activity, which tasks were assigned, and to whom.

Provide the name of the strains or products processed:

Enter the batch and serial numbers for the strains or product being processed:

Enter the weights of all the strains processed:

Enter the quantity of all products processed:

Signature

EXHIBIT: WATER QUALITY LOG

\*This form should be completed [online](#).

## Water Quality Log

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Date of test

Source of water:

Name of testing facility:

Attach test results

-OR-

Enter results:

Do the test results comply with water quality standards in the District of Columbia?

Yes

No

If you answered 'No' to the previous question, explain which standards were not met and plan of action:

Additional comments:

---

Manager Signature

EXHIBIT: FACILITY MAINTENANCE LOG  
\*This form should be completed [online](#).

## Facility Maintenance Log

Date:

List employees performing facility cleaning/  
maintenance:

List tasks performed:

List rooms or areas inside the facility which were the focus of these activities:

Select all methods used for this facility maintenance:

- Wet (spray equipment, rinsing, washing, or scrubbing)
- Dry (wiping, vacuuming, sweeping, or blowing or compressed air)
- Chemical solution application
- General repairs
- Painting
- Other

List all cleaning solutions or other chemicals used during this facility maintenance operations:

Select methods for preventing exposure of product to cleaning solutions during these operations:

- Temporary relocation of plants/product
- Air purifiers/fans
- Plant containment cover
- Product storage-container cover
- Rinsing surfaces to remove cleaning solution residue
- Other

Additional comments:

Employee Signature

Submit



EXHIBIT: DAILY WALK-THROUGH LOG

\*This form should be completed [online](#).

## Daily Walk Through Log

Date:

Manager Name:

---

### COMPLIANCE ITEMS

Was the alarm system armed upon arrival to the facility?  Yes  
 No  
 Other

Is there any evidence of marijuana having been consumed on-site?  Yes  
 No  
 Other

Is any marijuana or associated product visible to a person outside the facility?  Yes  
 No  
 Other

Are all patients and inventory records being filed and stored in accordance with state and city law, as well as company policy?  Yes  
 No  
 Other

Is all marijuana stored properly and securely inside a limited access areas?  Yes  
 No  
 Other

Is all external signage in compliance with state, city, and building codes?  Yes  
 No  
 Other

Is the security system on and working correctly?  Yes  
 No  
 Other

Manager Comments on Compliance Items

### PERSONNEL

# Daily Walk Through Log

Date:

Manager Name:

---

## COMPLIANCE ITEMS

Was the alarm system armed upon arrival to the facility?  Yes  
 No  
 Other

Is there any evidence of marijuana having been consumed on-site?  Yes  
 No  
 Other

Is any marijuana or associated product visible to a person outside the facility?  Yes  
 No  
 Other

Are all patients and inventory records being filed and stored in accordance with state and city law, as well as company policy?  Yes  
 No  
 Other

Is all marijuana stored properly and securely inside a limited access areas?  Yes  
 No  
 Other

Is all external signage in compliance with state, city, and building codes?  Yes  
 No  
 Other

Is the security system on and working correctly?  Yes  
 No  
 Other

Manager Comments on Compliance Items

## PERSONNEL

Is every person on-site properly identified with an identification badge or visitor's badge?  Yes  No  Other

Is each person assigned to a job function properly trained for that duty?  Yes  No  Other

Are workers informed on the current regulations?  Yes  No  Other

Manager Comments on Personnel and Training

**ENVIRONMENT**

Does the facility appear to be in good hygienic condition?  Yes  No  Other

Is ventilation equipment working effectively?  Yes  No  Other

Manager Comments on Environment

**WORK PROCESS**

Is the daily activity operating smoothly and effectively?  Yes  No  Other

Are all tools and equipment used in the facility working correctly?  Yes  No  Other

Manager Comments on Work Process:

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**DESCRIBE ANY CORRECTIVE ACTIONS NEEDED**

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Manager Signature:

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REVISION HISTORY

Version	ReleaseDate	Description	Author	Adopted By
1.0	11/01/2013	Draft	DRC	GM – 11/01/013

DRAFT



## GREENBELT MANAGEMENT MANUFACTURING PLAN SUMMARY

The Infused Products Manufacturing Plan describes operational plans for the production of Marijuana Infused Products (MIPs), in accordance with Department regulations and applicable ordinance and code. The types and forms of MIPs the company intends to produce are described along with methods of production and a detailed floor plan of functional company areas to be used for the preparation of MIPs. It is established that edible MIPs will not bear a reasonable resemblance to any product available for consumption as a commercially available candy. Any edible MIP resembling a typical food or beverage product will be packaged in an opaque package and labeled in accordance with state regulations.

A production manager, in coordination with the general manager, is assigned responsibility for the implementation of best manufacturing practices contained herein, and for ensuring the greatest variety of products from available marijuana by-product. Written production procedures will be developed, implemented, and maintained with documentation to be kept for a minimum of three years. Master production formulas and batch production records will be developed and maintained in accordance with Food and Drug Administration guidelines. Sample forms from the company's Facility Maintenance and Product Variance Logs are included.

Additional provisions thoroughly address batch processing, packaging and storage, labeling and extraction methods, inventory and recordkeeping requirements, personnel responsibilities, sanitation requirements, production area and equipment maintenance plans, regulatory food handling procedures, inspection plans, testing and contamination safeguards. Decarboxylation guidelines are included with comprehensive descriptions of relevant phytocannabinoids, flavonoid, phytosterol and terpenoid essential oil constituents of cannabis.

Safety rules addressed include those relevant to accident and hazard reporting, drug and alcohol use, driving, work-related injuries and the required use of personal protective equipment (PPE). Enforcement measures and disciplinary actions detailed are to be implemented in response to safety rule violations established herein. All emergency situations including chemical spill response will be handled by local emergency response agencies. Additional measures serve to establish procedures for injury claims and policies related to workers' compensation and benefits provided.

## MIPS REGULATORY

### Sec. 21a-408-55. Manufacturing of marijuana products

- (a) producer shall only manufacture or sell marijuana products in the following forms:
  - (1) Raw material;
  - (2) Cigarettes;
  - (3) Extracts, sprays, tinctures or oils;
  - (4) Topical applications, oils or lotions;
  - (5) Transdermal patches;
  - (6) Baked goods; and
  - (7) Capsules or pills.
- (b) No marijuana product shall:
  - (1) Include alcoholic liquor, dietary supplements or any drug, except for pharmaceutical grade marijuana. For purposes of this provision, alcoholic liquor does not include any liquid or

solid containing less than one-half of one percent of alcohol by volume or ethanol-based tinctures with an alcohol level approved by the commissioner;

(2) Be manufactured or sold as a beverage or confectionary;

(3) Be manufactured or sold in a form or with a design that:

(A) Is obscene or indecent;

(B) May encourage the use of marijuana for recreational purposes;

(C) May encourage the use of marijuana for a condition other than a debilitating medical condition; or

(D) Is customarily associated with persons under the age of eighteen;

(4) Have had pesticide chemicals or organic solvents used during the production or manufacturing process, except that the commissioner may authorize the use of pesticide chemicals for purposes of addressing an infestation that could result in a catastrophic loss of marijuana crops.

(c) Any marijuana product not in compliance with this section shall be deemed adulterated.

## MIPS GENERAL

Emergency contact posting.

The production manager must post and maintain an emergency contact list as described in the Incident Management Plan for production employees to refer to during an incident.

Compliance with local codes.

All production operations must comply with all applicable local ordinance and code. The general manager is responsible for operational compliance. All equipment must be approved by the appropriate local authority.

Prohibited products.

It is the policy of Greenbelt Management to prohibit the use of meat and dairy as an ingredient in any product produced by the organization.

No resemblance to other products.

Edible MIPS shall not bear a reasonable resemblance to any product available for consumption as a commercially available candy.

Best manufacturing process required.

The production manager in coordination with the general manager shall implement and maintain best manufacturing practices. Such practices shall conform to standard manufacturing practice and include guidance from industry associations including the American Herbal Products Association (to be released).

Product line variety.

It is Greenbelt Management policy to provide a large variety of product offerings to benefit as many patient populations as possible. The production manager shall ensure the greatest variety of products

from available marijuana by-product. All by-product must undergo an extraction procedure prior to being further processed into infused products. The general manager shall approve the addition of any new product line or processing method to production operations.

Packaging and labeling.

All packaging and labeling must be in accordance with the policies and procedures found in the Packaging and Labeling Plan.

## PRODUCTION MIX

Greenbelt Management is committed to providing a variety of medical marijuana products to patients. Infused products offer patients the medicinal benefits of cannabinoids without the combustion of plant material. Our focus is to provide, safe and effective medical marijuana products that benefit patient's wellbeing. It is Greenbelt Management policy to maintain a mature product line that avoids unnecessary sugary drinks or food products. Greenbelt Management intends to make the following products available to patients through its production operations:

Hash.

Hash concentrates are made from cannabinoid-rich glandular trichomes. Hash is more potent by volume than flower and is used by patients to manage intense symptoms quickly. For the purposes of this document and our product mix, hash is concentrated without the use of any solvent other than water.

Hash oils.

Hash oil is a mix of essential oils and resins extracted from mature cannabis flowers through the use of various solvents such as ethanol or hexane. For the purposes of this document and our product mix, hash oil is any form of concentrate extracted with chemical solvents and includes all forms (i.e. wax, shatter glass, rock, etc.).

Pre-dosed oil vaporizers.

Pre-dosed oil vaporizers are filled with premeasured doses of hash oil. Hash oil vaporizers provide patients a convenient and consistent delivery method. Refillable vaporizers will also be sold in the dispensary so that patients can use bulk hash oil to refill the cartridges themselves.

Ingestible and oral delivery methods.

Patients need a variety of oral delivery methods based on their condition and preferences. Greenbelt Management strives to provide the variety of strengths and cannabinoid profiles to patients including high CBD and CBD only products. Our ingestible product line includes:

- (1) Hash oil capsules
- (2) Sublingual tablets
- (3) Sublingual tinctures
- (4) Infused cooking oils for home use

Topicals.

Cannabinoids interact with CB1 and CB2 receptors that are found in the skin and the transdermal effect of topicals has been reported by many patients as positive. Topical infused products do not produce a

psychoactive effect and are used by many patients regardless of condition. Our product line of topicals includes:

- (1) Salve – 80% oil base
- (2) Cream – 50% oil base
- (3) Lotion – less than 50% oil base

Suppositories.

Suppositories will be produced upon request. Although not used by many patients, coconut oil based hash suppositories can be extremely beneficial to patient with severe gastrointestinal disorders or nausea.

## PRODUCTION METHODS

Batch processing and packaging.

The performance of any production process shall constitute a batch for labeling and recordkeeping purposes. The production manager in coordination with the dispensary manager shall determine the production mix. Products with multiple dosing levels may be achieved through production or packaging methods as determined by the production manager. All processed marijuana products must be packaged and labeled in accordance with the Packaging and Labeling Plan.

Extractions.

Greenbelt Management utilizes all marijuana by-product of acceptable quality in the product of their products. Hash will be available to patients and caregivers in ready-to-use form and the further processed and infused products listed below. Ready to use hash will be packed in dispensing containers and further packaged in child-proof heat sealed packaging. Three extraction methods are employed:

- (1) Water.
  - (a) Agitating equipment and ice is used.
  - (b) Processed water may undergo additional processing to mitigate low yields from water extraction.
  - (c) Solvent-less process results in residue free hash.
- (2) Butane solvent – ASME certified closed loop system.
  - (a) Retains high level of compounds and terpenes.
  - (b) Results in high quality hash from lower grade by-product.
  - (c) The low yield of extractions should be considered.
- (3) Super and subcritical CO<sub>2</sub> – ASME certified closed loop system.
  - (a) The relatively low temperature of the process and the stability of CO<sub>2</sub> permits most cannabinoids to be extracted with little damage or denaturing.
  - (b) Allows for some ability to selectively extract targeted compounds allowing targeted products.
  - (c) Results in a clean residue-free end product.

Decarboxylation and methodology development.

The production manager must ensure that all products contain marijuana that has been appropriately decarboxylated. The following information is has not been scientifically verified and should use as a guideline for the production manager to develop processes that must be tested by Greenbelt

Management's laboratory. All trials and test results shall be documented and used to develop Greenbelt Management methodologies and recipes.

#### Decarboxylation Guidelines

Source: <http://www.marijuanagrowershq.com/decarboxylating-cannabis-turning-thca-into-thc/> (Testing provided by SC Labs)

KIEF			
Compound	Before Decarb	30 Min Decarb	60 Min Decarb
THCA	24.5%	2.6%	.1%
THC	3.8%	25.4%	25.5%
CBDA	.6%	.3%	.3%
CBD	0%	1%	.1%
CBN	.4%	1%	1.4%
Moisture	0%	0%	0%
Total Cannabinoids	29.3%	30.3%	27.4%
CANNABIS TRIM (By-Product)			
Compound	Before Decarb	30 Min Decarb	60 Min Decarb
THCA	6.5%	2.9%	.2%
THC	.6%	4.8%	6.9%
CBDA	.2%	.2%	.1%
CBD	0%	0%	.1%
CBN	0%	0%	0%
Moisture	3.4%	4.5%	0%
Total Cannabinoids	7.3%	7.9%	7.3%

#### PHYTOCANNABINOIDS

THC ( $\Delta$ -9-tetrahydrocannabinol)

Boiling point: 157° C / 314.6° Fahrenheit

Properties: Euphoria, Analgesic, Anti Inflammatory, Antioxidant, Antiemetic

CBD (cannabidiol)

Boiling point: 160-180°C / 320-356° Fahrenheit

Properties: Anxiolytic, Analgesic, Antipsychotic, Anti Inflammatory, Antioxidant, Antispasmodic

CBN (Cannabinol)

Boiling point: 185°C / 365° Fahrenheit

Properties: Oxidation, breakdown, product, Sedative, Antibiotic

CBC (cannabichromene)

Boiling point: 220° / 428° Fahrenheit

Properties: Anti Inflammatory, Antibiotic, Antifungal

$\Delta$ -8-THC ( $\Delta$ -8-tetrahydrocannabinol)

Boiling point: 175-178°C / 347-352.4° Fahrenheit

Properties: Resembles  $\Delta$ -9-THC, Less psychoactive, More stable Antiemetic

THCV (Tetrahydrocannabivarin)

Boiling point: < 220°C / <428° Fahrenheit

Properties: Analgesic, Euphoria

## TERPENOID ESSENTIAL OIL CONSTITUENTS OF CANNABIS

$\beta$ -Myrcene

Boiling point: 166-168°C / 330.8-334.4° Fahrenheit

Properties: Analgesic. Anti Inflammatory, Antibiotic, Antimutagenic

$\beta$ -Caryophyllene

Boiling point: 119°C / 246.2° Fahrenheit

Properties: Anti Inflammatory, Cytoprotective (gastric mucosa), Antimalarial

d-Limonene

Boiling point: 177°C / 350.6° Fahrenheit

Properties: Cannabinoid agonist?, Immune potentiator, Antidepressant, Antimutagenic

Linalool

Boiling point: 198°C / 388.4° Fahrenheit

Properties: Sedative, Antidepressant, Anxiolytic, Immune potentiator

Pulegone

Boiling point: 224°C / 435.2° Fahrenheit

Properties: Memory booster?, AChE inhibitor, Sedative, Antipyretic

1,8-Cineole (Eucalyptol)

Boiling point: 176°C / 348.8° Fahrenheit

Properties: AChE inhibitor, Increases cerebral, blood flow, Stimulant, Antibiotic, Antiviral, Anti Inflammatory, Antinociceptive

$\alpha$ -Pinene

Boiling point: 156°C / 312.8° Fahrenheit

Properties: Anti Inflammatory, Bronchodilator, Stimulant, Antibiotic, Antineoplastic, AChE inhibitor

$\alpha$ -Terpineol

Boiling point: 217-218°C / 422.6-424.4° Fahrenheit

Properties: Sedative, Antibiotic, AChE inhibitor, Antioxidant, Antimalarial

Terpineol-4-ol

Boiling point: 209°C / 408.2° Fahrenheit

Properties: AChE inhibitor. Antibiotic

p-Cymene

Boiling point: 177°C / 350.6° Fahrenheit

Properties: Antibiotic, Anticandidal, AChE inhibitor

Borneol

Boiling point: 210°C / 410° Fahrenheit

Properties: Antibiotic

$\Delta$ -3-Carene

Boiling point: 168°C / 334.4° Fahrenheit

Properties: Anti Inflammatory

## FLAVONOID AND PHYTOSTEROL CONSTITUENTS OF CANNABIS

Apigenin

Boiling point: 178°C / 352.4° Fahrenheit

Properties: Anxiolytic, Anti Inflammatory, Estrogenic

Quercetin

Boiling point: 250°C / 482° Fahrenheit

Properties: Antioxidant, Antimutagenic, Antiviral, Antineoplastic

Cannflavin A

Boiling point: 182°C / 359.6° Fahrenheit

Properties: COX inhibitor, LO inhibitor

β-Sitosterol

Boiling point: 134°C / 273.2° Fahrenheit

Properties: Anti Inflammatory, 5-α-reductase, inhibitor

## PRODUCT MIX

Hash oil cartridges.

Vaporizer units will be purchased by the production manager based on safety, price, quality, warranty, availability, patient preferences, and other considerations. CO2 extracted hash oil will be filled into the cartridges in various pre-measured strengths and doses determined by the production manager.

Cartridges will be packaged in child-proof heat sealed packaging.

Hash oil capsules.

Greenbelt Management employees will hand-fill gel capsules in strengths and dosing as determined by the production manager. Capsules will be packaged in child-proof heat sealed packaging.

Sublingual tablets.

Sublingual tablets will be formulated for a variety of strengths and doses and will be hand molded.

Tablets will be packaged in child-proof heat sealed packaging.

Sublingual tinctures.

Alcohol based and glycerin based tinctures will be manufactured and packaged for a variety of application methods including drops and sprays. Containers will be further packaged in child-proof heat sealed packaging.

Infused cooking oils for home use.

Cooking oils are infused with hash for a variety of potencies. Oils used for infusion will be determined by the production manager based on efficacy and patient demand. Oils will be packaged in glass bottles with tamper proof caps and further packaged into child-proof heat sealed packaging.

Topicals.

Hash infused salves, creams, and lotions will be produced by hand in small batches. The production manager will determine the ingredients based on patient needs. Topicals will be packaged in containers

that are easy to open for patients with arthritis or other joint disorders and will be further packaged into child-proof heat sealed packaging.

Suppositories.

Suppositories will be manufactured on demand in the dose requested by the patient as ordered by the dispensary manager. No single suppository manufactured may contain more than 250 mg THC. Suppositories are prepared using an infused cocoa butter and poured into molds by hand. Suppositories are wrapped in food grade foil wrappers and further packaged in heat sealed child-proof packaging.

## GENERAL BEST MANUFACTURING PRACTICES

Production manager requirements.

- (1) The production manager is responsible for the oversight of all production processes ensuring the safety of Greenbelt Management employees and patients.
- (2) The general manager must ensure the production manager is qualified, possesses the appropriate education, training, and experience, or any combination thereof, to perform their job duties in such a manner as to provide assurance that the marijuana product has the identity, purity, strength, and composition that is represented on the label.
- (3) The production manager must seek out and receive appropriate training as necessary.
- (4) The production manager must assign one or more employees to supervise overall sanitation in accordance with the Facilities and General Operations Plan and necessary department specifications. Each of these employees must be qualified by education, training, or experience to develop and supervise sanitation procedures for production operations. Maintenance schedules must ensure the sanitary conditions of all production areas and all sanitation and maintenance activities must be recorded in the Facility Maintenance Log.

Personnel training.

All production employees must receive standard Greenbelt Management training as well as training specific to the department and their work functions including food handling. Training shall be provided by the production manager and outside providers as necessary according to the requirements determined in the Training Plan.

Personnel responsibilities.

The production manager is responsible for ensuring that any employee who might be a source of microbial contamination due to a health condition to any product constituent including marijuana or any given contact surface used in operations is prohibited from the production area until no longer a potential source of contamination. Such measures include the following:

- (1) Removing the employee from the schedule until the health condition no longer exists. The production manager may require a doctor's return to work authorization as necessary; and
- (2) Requiring employees to notify the production manager if there exists or a reasonable possibility exists as a condition of continued employment.

Prevention of adulteration.

Hygienic practices must be employed by every employee in the production department. Every department employee must adhere to the hygiene and sanitation practices found in the Facilities and General Operations Plan. These hygienic practices include the following:



- (1) Use of clothing or uniforms that protect against the contamination of any constituents or a product (including marijuana) and any contact surface;
- (2) Maintaining adequate personal cleanliness;
- (3) Washing hands thoroughly with soap (and sanitizing if necessary to protect against contamination with microorganisms):
  - (a) Before any work period;
  - (b) After any break; and
  - (c) At any other time when the hands may have become soiled or contaminated during manufacturing processes.
- (4) No removable jewelry may be worn during work;
- (5) Gloves are required for handling product constituents at risk for contamination. The gloves must be of an impermeable material;
- (6) Hair nets, caps, beard covers, or other effective hair restraints must be used when necessary;
- (7) Product constituents should be stored in clean and safe conditions according to the item's needs away from employee personal effects, cleaning supplies, and other products;
- (8) Personal food items, chewing gum, drinking beverages, and use of tobacco products in production areas is prohibited;
- (9) Every employee is required to take any other precaution necessary to protect against the contamination of marijuana products; and
- (10) Every employee is required to take any precaution necessary to maintain the security of facility, to prevent unauthorized access to controlled access areas, and to maintain strict control of all marijuana in storage and in-process.

Limited access areas.

The production area must be secured at all times and limited access areas are subject to the policies and procedures defined in the Facilities and General Operations Plan.

Personnel safety.

The production manager is responsible for the implementation of policies and procedures to protect personnel in all operations and provide personnel with adequate safety training to comply with these policies. Such policies must be in compliance with the Safety Plan and be similar to personnel safety policies in similar operations in comparable industries, such as food manufacturers including at a minimum:

- (1) Employee accident reporting and investigation policies;
- (2) Fire prevention and response plans;
- (3) Materials handling and hazard communications policies; and
- (4) Personal protective equipment policies.

Safety equipment.

The production manager must ensure all department specific safety equipment needed is provided and maintained. For example, all personal protective equipment required by the MSDS record for solvents and gases must be provided to an employee handling the materials and at least one emergency eye flushing station is readily accessible to all employees handling dangerous materials.

Production area design, construction, and maintenance.

- (1) The production area must be suitable in size, design, and construction for safe production operations. The production manager shall not permit any operation in the department that is unsafe or unsuitable for the facility.
- (2) Operations must have sufficient space as to promote safe and orderly processes and prevent constituent mix-ups.
- (3) Production areas must be able to be maintained. Any repairs necessary to maintain sanitary conditions must be caused by the production manager as soon as possible.
- (4) If a condition exists that prohibits the safe and sanitary production of marijuana products, the production manager, in his or her discretion may suspend production operations until resolved.

Daily walk through inspections.

The production manager or designee must visually inspect all production areas daily to identify potential hazards. The inspection shall cover at a minimum an assessment of the condition of:

- (1) Floors, walls, and ceilings must be clean and in good repair;
- (2) Fixtures, ducts, and pipes must not contaminate product constituents or contact surfaces by dripping, other leakage, or condensation;
- (3) Aisles or working spaces between equipment must be adequately unobstructed and permit all persons to work and protect against contamination of constituents, contact surfaces, and garments.

Separate production areas.

The production manager must ensure each production operation has sufficient room and storage to prevent cross-contamination and mix-ups of constituents. Separate areas are required for:

- (1) Receiving constituents including marijuana by-product, packaging materials, cleaning supplies, etc.
- (2) Waste including separate locked storage of marijuana and infused product waste.
- (3) Storage of marijuana by-product, in-process marijuana, and finished infused products must be separate from other supplies and secured at all times when not in use. Packaging and labeling operations should be separate from production areas.
- (4) Any in-house analysis operation must be separate from production and storage areas.
- (5) Cleaning and sanitation products must be stored away from all constituents and packaging and labeled in accordance with the Safety Plan.

Production environment.

All necessary precautions must be taken during the processing, manufacture, and packaging of marijuana products to prevent contamination of product constituents, packaging materials, and infused products. These safeguards include, but are not limited to:

- (1) Cleaning and sanitizing equipment, containers, and other contact surfaces;
- (2) Controlling airborne contamination;
- (3) Using sanitary handling procedures;
- (4) Washing or cleaning constituents that contain soil or other contaminants;
- (5) Using quality water;
- (6) Performing chemical, microbiological, or other testing, as necessary to prevent the use of contaminated marijuana in infused products;
- (7) Sterilizing, pasteurizing, freezing, refrigerating, heating, pressurizing, controlling hydrogen-ion concentration (pH), controlling humidity, controlling water activity (aw), or using any other

effective means to remove, destroy, or prevent the growth of microorganisms and prevent decomposition;

- (8) Storing constituents, in-process materials, and marijuana products appropriately to prevent contamination and adulteration;
- (9) Preventing cross-contamination and mix-ups between contaminated items and clean items;
- (10) Using effective measures to protect marijuana products against adulteration by plastic, glass, metal, or other foreign materials when at risk due to processing equipment or materials.

Repairs and maintenance.

The production manager in coordination with the general manager must ensure all production areas are maintained in a manner that prevents the contamination of any product constituents or contact surfaces.

Water supply.

The production manager must ensure the safety of the water supply used in production operations. If the production facility utilizes the same water supply as the cultivation facility, the production manager may obtain water quality reports from the cultivation manager. The production manager must ensure the production facility's water supply is maintained in accordance with the policies and procedures found in the Facilities and General Operations Plan.

Environmental controls.

- (1) Adequate ventilation equipment must be provided such as filters, fans, exhausts, dust collection, and other air-blowing equipment, that minimize odors, dust, and vapors (including steam and noxious fumes) in areas where they may contaminate product constituents or contact surfaces.
- (2) Equipment that controls temperature, humidity, and/or microorganisms must be used as necessary to ensure the quality of the marijuana product.
- (3) When air moving equipment is used, it must be designed, located, and operated in a manner that minimizes the potential for microorganisms and particulate matter to contaminate product constituents or contact surfaces.

Plumbing.

Plumbing, bathrooms, and hand-washing facilities must be compliant and maintained as described in the Facilities and General Operations Plan. All draining areas must be maintained so that they do not contribute to the contamination of product constituents or contact surfaces by seepage, filth or any other extraneous materials, or by providing a breeding place for pests. Waste treatment and disposal systems must be maintained in good working order so that they do not constitute a source of contamination in areas where product constituents or contact surfaces are exposed.

Lighting.

- (1) Sufficient lighting that allows for employees must be provided in:
  - (a) All areas where product constituents are examined, processed, or stored;
  - (b) All areas where contact surfaces are cleaned; and
  - (c) Hand-washing areas and bathrooms.
- (2) Safety lighting products must be used when the light bulbs, fixtures, skylights or other glass or glass-like materials are suspended over exposed product constituents.

#### Sanitation requirements.

- (1) The production manager must ensure all production areas are maintained in compliance with the sanitation requirements found in the Facilities and General Operations Plan. Additionally, all necessary department specific requirements must be developed and enforced by the production manager in order to ensure safe production areas and unadulterated marijuana infused products.
- (2) The production manager must maintain written procedures assigning responsibility for sanitation and describing in sufficient detail the cleaning schedules, methods, equipment, and materials to be used in cleaning the production area; such written procedures must be followed, and records of cleaning and sanitation must be kept in the facility maintenance log (Exhibit J).
- (3) All Greenbelt Management employees are required to report unsanitary conditions in any Greenbelt Management company facility to their department manager.
- (4) UV sterilization door strips and dip tanks should be used in critical locations throughout the production facility.
- (5) Frequent hand-washing is necessary in all production activities and must be enforced by the production manager. Cultivation employees that do not comply with hand-washing requirements may be terminated.
- (6) All production employees are responsible for the sanitation of production areas. All critical areas must be clean and free of any contamination risks at the end of each shift.
- (7) Any mold found in the facility must be addressed by a mold removal expert immediately.

#### Hazardous materials.

- (1) Cleaning compounds and sanitizing agents must be free from microorganisms of public health significance, approved by the EPA, and be safe and adequate under the conditions of use.
- (2) Cleaning compounds, sanitizing agents, pesticides, pesticide chemicals, and other toxic materials must be identified, stored, and used in a manner that protects against contamination of product constituents or contact surfaces.
- (3) Hazardous materials, including butane and CO<sub>2</sub> tanks, and toxic chemicals may not be used or stored in production areas where product constituents or contact surfaces are manufactured or exposed, unless those materials are necessary as follows:
  - (a) To maintain clean and sanitary conditions;
  - (b) For use in laboratory testing procedures, if applicable;
  - (c) For maintaining or operating the facility or equipment; or
  - (d) For use in the production operations.

#### Pest control.

The production manager is responsible for surveillance of pest activity and must ensure that pest management activities comply with procedures found in the Facilities and General Operations Plan.

#### Waste disposal.

All marijuana waste from production operations must be disposed of in accordance with the Inventory Management and Waste Disposal Plan. All other production waste must be stored and disposed of as to:

- (1) Minimize the development of odors;
- (2) Minimize the potential for waste to attract, harbor, or become a breeding place for pests;
- (3) Protect against contamination of product constituents, infused products, contact surfaces, water supplies, and grounds surrounding the facility; and

- (4) Control hazardous waste to prevent contamination of product constituents, infused products, contact surfaces, water supplies, and grounds surrounding the facility.

Security requirements.

The production manager must ensure that all production areas are compliant with security requirements found in the Security Plan. All areas that contain stored marijuana or marijuana in process must be surveyed and secure at all times.

## PRODUCTION AND PROCESS CONTROLS

The production manager must ensure proper controls are applied during all production processes. Written procedures must be developed, implemented, and maintained. Production records must be documented and kept for a minimum of three years. The production manager must ensure the proper development and maintenance of [master production records and batch production records](#). The general manager shall ensure the production manager has all necessary resources to develop and update production controls in a manner similar to good manufacturing practices for other similar industries.

Production process controls.

- (1) Appropriate procedures must be used to assure that correct product constituents, packaging, and labels are used for marijuana products.
- (2) Production constituents must be examined for suitability and correctness before processing operations. This examination must be documented in a batch production record (BPR).
- (3) Marijuana flower and by-product used in marijuana products must be tested and approved for use prior to processing according to the procedures defined in the Quality Control and Recall Plan.
- (4) Work areas must be inspected prior to use to ensure that all marijuana products, packaging materials, and labels have been stored after previous operations. These inspections must be documented in the BPR.
- (5) Marijuana containers held for future processing operations must be identified to preclude mislabeling of individual containers, lots, or portions of lots. Identification need not be applied to each individual container but must be sufficient to determine name (including strength, key features of the form or composition, or grade if applicable), quantity of contents, and batch, lot or control number of each container.
- (6) Label printers must be monitored to ensure that labels meet the requirements of the master production record (MPR) for each batch.
- (7) Packaged and labeled marijuana products must be examined during finishing operations to ensure containers and packages in the batch have the correct label; the correct batch, lot, or control number; and the correct expiration date. These examinations must be recorded in the BPR.
- (8) A representative sample must be collected at the completion of finishing operations and must be visually examined for correct labeling and coding; the results must be recorded in the BPR. Sampling must be handled in accordance with the Quality Control and Recall Plan.

Labeling procedures.

The production manager must implement strict controls over labeling operations.

- (1) Written, controlled, and supervised procedures must be used for issuance of labels to a cultivation or production batch.

- (2) Labeling materials issued for a batch must be carefully reviewed prior to use for identity and conformity to the labeling specified in the MPR and BPR. This examination must be documented in the BPR.
- (3) All excess labeling bearing batch, lot, or control numbers must be destroyed.
- (4) Each batch of marijuana product must bear on the label required information as defined in the Packaging and Labeling Plan.

Receiving marijuana product constituents and packaging materials.

- (1) The production manager must develop, implement, and maintain detailed written procedures for the receipt, identification, storage, handling, sampling, testing, and approval or rejection of marijuana and packaging materials.
- (2) Each container or group of containers for marijuana product constituents and packaging materials must be identified with a distinctive code (i.e. batch, lot, or control number) for each lot in each shipment received for traceability. This code must be used in the BPR.
- (3) Each employee engaged in receiving operations must be trained in process and confirmation of specifications to be met for marijuana product constituents and packaging materials including:
  - (a) Identity;
  - (b) Strength and composition; and
  - (c) Purity, including limits on those types of contamination that may adulterate or may lead to adulteration of marijuana products, such as filth, insect infestation, microbiological contamination, or other contaminants. The method of administration and any hazards to certain patient populations must be considered when developing specifications.
- (4) The supplier's documentation for each shipment must be reviewed to ensure the marijuana product constituents and packaging materials are consistent with what was ordered prior to entering receipt into the inventory management system.
- (5) Marijuana product constituents and packaging materials must be stored under quarantine until they have been approved for specifications by a trained employee.
- (6) Re-inspection of marijuana product constituents and packaging materials must be performed, as appropriate, for identity, purity, strength, and composition and approved or rejected as necessary, e.g., after storage for long periods or after exposure to air, heat or other conditions that might adversely affect the constituent.
- (7) Outdated or incorrect labels must be rejected and properly disposed of so that they cannot be used again.

Proper allocation of marijuana product constituents.

- (1) Constituents used in a product batch must be weighed, measured, or subdivided as appropriate for the batch according to the MPR.
- (2) If a constituent is removed from the original container to another, the new container must be and entered into the inventory management system identified with the following information:
  - (a) Constituent name, and strength, key features of its form or composition, or grade if applicable;
  - (b) Batch, lot, or control number;
  - (c) Weight or measure in new container; and
  - (d) Batch for which constituent was dispensed, including its product name and batch, lot, or control number, and strength, key features of its form or composition, or grade if applicable.

- (3) Each container of marijuana product constituent dispensed be examined by a second employee to assure that:
  - (a) The constituent was approved for use;
  - (b) The weight or measure is correct as stated in the MPR; and
  - (c) The containers are properly identified.
- (4) If the weighing, measuring, or subdividing operations are performed by automated equipment, only one person may be needed to verify items depending on the type of automation used.
- (5) Each constituent must either be added to the batch by one person and verified by a second person or, if the constituents are added by automated equipment, only verified by one person.

#### Production failures.

Any unexplained occurrence or discrepancy, and any failure of the product to meet its specifications or requirements, must be documented and investigated. The investigation must extend to any related batches that may have been associated with the same specific failure, discrepancy, or problem; this may include, but is not limited to, batches of the same marijuana product, other batches processed on the same equipment or during the same time period, other batches produced using the same lots of constituents or packaging constituents.

#### Sampling requirements.

- (1) A representative sample of each lot or batch of marijuana product must be collected, by removing and compositing portions of material or units from throughout the containers in the lot or batch.
- (2) In addition to representative samples, other samples may be taken as appropriate to ensure safe and standardized marijuana products:
  - (a) Monitor the quality of in-process materials during production.
  - (b) Examine the degree of variability of materials or products.
  - (c) Investigate known or suspected non-conformances.
- (3) The number of containers and the amount of material or units to be removed from each container as determined by the production manager, must be based on appropriate criteria such as the quantity needed for testing, examination, and reserve; the past quality history of the item; the expected variability of the material or units being sampled; and the degree of confidence and precision required.
- (4) The containers selected for sampling must be based on rational criteria such as random sampling; directed sampling may be used where appropriate.
- (5) Samples must be collected in accordance with the following procedures:
  - (a) Product containers must be opened, sampled, and resealed in a manner designed to prevent contamination of their contents or of other constituents, packaging materials, in-process materials, and marijuana products.
  - (b) Sterile equipment and aseptic sampling techniques must be used when necessary.
  - (c) Where appropriate for the purpose and the nature of the material being sampled, sample portions should be removed from the top, middle, and bottom of containers. Such sample portions may be composited in forming the representative sample, or may be tested separately, as appropriate to the purpose.
- (6) Containers from which samples have been taken must be marked to show that samples have been removed from them and identified with the following information:
  - (a) The name of the item sampled;
  - (b) The lot, batch, lot, or control number;

- (c) The container from which the sample was taken, or for samples taken directly from the production line, the equipment line and time at which the sample was taken;
  - (d) The date on which the sample was taken;
  - (e) The name of the person who collected the sample; and
  - (f) The quantity and unit of measure of the sample.
- (7) Each sample removed from a lot or batch must be recorded in the inventory or batch production records for the lot or batch.
  - (8) The quantity of sample used for each test or examination must be of sufficient size or number to ensure the results are representative of the lot or batch.
  - (9) Reserve samples of twice the quantity needed for testing must be prepared from the representative sample of each batch of constituent or marijuana product.
  - (10) Reserve samples of constituents and packaging constituents should:
    - (a) Be stored using an appropriate container-closure to protect against contamination or deterioration during storage;
    - (b) Be stored under conditions consistent with the typical storage conditions for the constituent or product.
    - (c) Be retained for one year past the expiration date of the last batch of marijuana product manufactured or packaged from the lot, for use in appropriate investigations.

#### Calculation of yield.

- (1) Actual yields and percentages of theoretical yield must be determined at the conclusion of each appropriate phase of manufacturing, processing, packaging, or labeling of the marijuana product. Such calculations must either be performed by one person, and independently verified by a second person; or, if the yield is calculated by automated equipment, be independently verified by one person.
- (2) If the percentage of theoretical yield at any process step or at the end of production falls outside the maximum or minimum percentage of theoretical yield allowed in the MPR, the production manager must conduct an investigation of the batch and determine, to the extent possible, the source of the discrepancy. The deviation must be documented, justified, and approved by the general manager.

#### Process monitoring during production.

- (1) Process specifications must be established by the production manager for production process parameters at or during any point, step, or stage where control is necessary to ensure the quality of the batch of marijuana product, and to detect any unanticipated occurrence that may result in contamination, adulteration, or a failure to meet specifications. The process parameters to be monitored may include, but are not limited to, the following as appropriate:
  - (a) Time;
  - (b) Temperature;
  - (c) Pressure; and
  - (d) Speed.
- (2) Production process parameters must be monitored at or during any point, step, or stage where process specifications have been established.
- (3) Any deviation from the specified process parameters must be approved by the production manager, documented, and justified in the Procedure Variance Log.



Master production records.

- (1) For each extraction process and unique formulation of marijuana product, a master production record (MPR) must be prepared by the production manager.
- (2) For a process which consists of manufacturing and bulk packaging of a marijuana product, a MPR (“manufacturing MPR”) covering both manufacturing and bulk packaging must be prepared for each batch size of the product.
- (3) For a process which consists of retail packaging of a marijuana product, a MPR (“packaging MPR”) must be prepared for retail packaging of the product.
- (4) For a process which consists of both manufacturing and retail packaging of a marijuana product, a MPR (“manufacturing and packaging MPR”) covering both manufacturing and retail packaging may be prepared, or separate MPRs may be prepared for the manufacturing vs. the retail packaging. In either case, a separate MPR must be prepared for each batch size of the manufacturing process.
- (5) The MPR must include, as applicable to the process the name of the marijuana product to be manufactured and/or packaged, including its strength, grade, and/or key features of its form, composition, or functionality if applicable.
- (6) For manufacturing MPRs:
  - (a) The batch size;
  - (b) The weight or measure of each constituent to be used in the batch, including the unit of measure;
  - (c) Any acceptable range or variation in the weight or measure of a constituent must be explained and justified.
  - (d) A statement of any intentional overage amount of a constituent, or a cross-reference to the master formula where such information is found;
  - (e) The name and label quantity claim of each ingredient declared on the label for the product, or a cross-reference to the master formula where such information is found.
  - (f) The name of each constituent to be used in the batch, including its strength, key features of its form or composition, or grade if applicable;
  - (g) The name of each packaging constituent to be used, including its size, grade, or key features of its composition, construction, or functionality, if applicable;
  - (h) A specimen of the bulk or retail label and all other labeling to be used, or a cross-reference to each piece of labeling (such as by label number and version number);
  - (i) A statement of theoretical yield for each significant process step and at the end of manufacture and of packaging, including the maximum and minimum allowed percentages of theoretical yield;
  - (j) Written instructions, including the following:
- (7) Instructions for the execution of each process step, or cross-references to the written procedures to be used at each step;
- (8) ii. Instructions for monitoring of production process specifications, or cross-references to standard procedures for such monitoring;
- (9) iii. Instructions for in-process and final product sampling, or cross-references to standard procedures for such sampling;
- (10) iv. Instructions for in-process material testing and examination, or cross-references to standard procedures for such testing and examination;
- (11) Marijuana product specifications, or a cross-reference to marijuana product specification documents;
- (12) Instructions for marijuana product testing and examination, or cross-references to standard procedures for such testing and examination; and

- (13) Other notes and precautions to be followed.
- (14) Manufacturing MPRs must be written with the intent to provide not less than one hundred percent of the labeled or established amount of marijuana and any other ingredient for which a quantitative label claim is made.
- (15) The production process described in the MPR must ensure that product specifications are consistently met and that the product is uniform from batch to batch.

Batch production records.

- (1) For each batch manufactured or packaged, a batch production record (BPR) must be prepared and checked for accuracy by quality control personnel.
- (2) The BPR must form a complete record of the manufacturing, packaging, labeling, sampling, and testing of the batch, including record of any procedure variances.
- (3) Each batch must be assigned a batch, lot, or control number which allows the complete history of the production and distribution of the batch to be determined. This code must be used in recording the disposition of each batch.
- (4) The BPR must be an accurate reproduction of the appropriate MPR. The BPR must include, as applicable to the process:
  - (a) The name of the marijuana product, including its strength, key features of its form or composition, or grade if applicable, and the product's item code or product number if such are used by the manufacturing, packaging, labeling or holding operation;
  - (b) The batch, lot, or control number of the marijuana product;
  - (c) For manufacturing MPRs, the nominal batch size;
  - (d) The name of each constituent used in production of the batch, including its strength, key features of its form or composition, or grade if applicable;
  - (e) The name of each packaging material used in production of the batch, including its size, grade, or key features of its composition, construction, or functionality if applicable;
  - (f) (6) The batch, lot, or control number of each constituent and packaging materials used in production of the batch;
  - (g) The weight or measure of each lot of each constituent used in production of the batch, including the unit of measure;
  - (h) The quantity of each lot of each packaging constituent and each label used, including the unit of measure;
  - (i) The date(s) on which, and where applicable the time(s) at which, each step of the MPR was performed;
  - (j) The actual results obtained during monitoring of production process parameters;
  - (k) The identity of processing lines and major equipment used in producing the batch;
  - (l) The date and time of the maintenance, cleaning, and sanitizing of the processing lines and major equipment used in producing the batch, or a cross-reference to records, such as individual equipment logs, where this information is recorded;
  - (m) The date and time of the maintenance and the calibration, inspection, or other performance verification of instruments and of automated, mechanical, or electronic equipment used directly in production of the batch; or a cross-reference to records, such as individual equipment logs, where this information is recorded;
  - (n) A statement of the actual yield and a statement of the percentage of theoretical yield at each significant process step and at the end of manufacturing and of packaging;
  - (o) Records of any marijuana waste generated during production of the batch;
  - (p) Records of any treatment, process adjustment, reprocessing, repackaging, relabeling, or other deviation that occurred during production of the batch;

- (q) An actual or representative label used in packaging of the batch, and a specimen of any other labeling used;
- (r) Records of the date, time where applicable, quantity, and person responsible for any sample removed during or after production;
- (s) The actual results of any testing or examination of in-process marijuana material, or a cross-reference to such results;
- (t) Documentation that the marijuana product meets its specifications for identity, purity, strength, and composition, and is packaged and labeled in accordance with the requirements of the MPR; and
- (u) The identity of each person involved in production of the batch, including employees who perform secondary operations.

Inventory and recordkeeping requirements.

- (1) The production manager must ensure proper inventory management and recordkeeping in accordance with the policies and procedures found in the Inventory Management and Waste Disposal Plan and the Recordkeeping, Reporting and Notifications Plan.
- (2) For each shipment of constituents, packaging materials, or marijuana product received from another company for use in production, a record must be kept of the following:
  - (a) The name, strength, grade, and key features of its form, composition, construction, or functionality, as applicable to the item; and any item code, constituent number, or product number;
  - (b) The quantity as verified by two employees;
  - (c) The manufacturer or supplier from which the shipment was received;
  - (d) The manufacturer's or supplier's lot number, if known;
  - (e) The batch, lot, or other control number assigned to the shipment;
  - (f) The date of receipt;
  - (g) The means by which the shipment is delivered, including where applicable the name of the commercial or private carrier, and preferably including the name and where applicable the identification number of the delivery person;
  - (h) Inspection, sampling, testing, and examinations performed on the lot, and the conclusions derived;
  - (i) Any treatment, reprocessing, or other deviation performed on the lot prior to use in production;
  - (j) Disposition of the lot if applicable, including the date and the signature of the person responsible for approving or rejecting the lot and any treatment, reprocessing, or other deviation performed thereon;
  - (k) A record of each use of the lot in production, including the quantity used, including unit of measure; the name and lot, batch, or other control number of the batch in which the lot is used; and the initials of the employee(s) responsible for removing from storage the necessary quantity for use in the designated batch.
  - (l) A record of any portion of the lot returned from production to storage, including the quantity returned, including unit of measure; the name and lot, batch, or other control number of the batch from which the portion is returned; and the initials of the employee(s) responsible for verifying the quantity returned.
  - (m) A record of any portion of the lot scrapped from storage, including the quantity, unit of measure, reason, and persons responsible for measuring the quantity.
- (3) For each batch of marijuana product distributed by the production operation, a record must be kept of the following:

- (a) The name, strength, grade, and key features of its form, composition, or functionality, as applicable to the item; and any applicable item code, constituent number, or product number;
- (b) The manufacturer or packager from which the batch was received, unless it was manufactured or packaged by the operation itself;
- (c) The batch, lot, or other control number assigned to the batch;
- (d) The manufacturer's or packager's lot number, if different from the Greenbelt Management's control number;
- (e) The date of receipt into storage at the production facility;
- (f) Where applicable, the means by which the shipment is delivered, including the name of the commercial or private carrier, and preferably including the name and where possible the identification number of the delivery person;
- (g) Inspection, sampling, testing, and examinations performed on the batch, and the conclusions derived therefrom, unless such records are contained in production records for the batch;
- (h) Any treatment, reprocessing, or other deviation performed on the batch prior to distribution, unless such records are contained in the production records for the batch;
- (i) Disposition of the batch by the production manager, including the date and the signature of the person responsible for approving or rejecting the batch for distribution; and the date and the signature of the person responsible for approving or rejecting any treatment, reprocessing, or other deviation performed thereon unless such records are contained in the manufacturing, packaging, labeling or holding operation's production records for the batch;
- (j) A record of each distribution of the batch, including the quantity distributed, including unit of measure; the name and address of each company to which, or person to whom, the batch is distributed, unless a system exists to unambiguously cross-reference the name to the corresponding address maintained on file separately; the means by which each shipment is distributed, including where applicable the name of the commercial or private carrier, and preferably including the name and where possible the identification number of the delivery person; and the initials of the persons responsible for removing from storage the necessary quantity for each shipment. Each distribution must be verified by a second person.

Reconciliation and inventory counts.

The production manager is responsible for maintaining accurate inventory levels and for the reconciliation of the disposition of each batch of manufactured products in accordance with the Inventory Management and Waste Disposal Plan. Additional department specific inventory measures include, but are not limited to:

- (1) After each lot or batch is consumed, a reconciliation must be performed of the quantity received into storage against the quantity used, distributed, and/or scrapped. Such calculations must be performed by one person and independently verified by a second person.
- (2) Narrow limits must be established, based where possible on historical operating data, for the amount of allowable variation in the reconciliation.
- (3) When a reconciliation falls outside the allowed limits, the production manager must conduct an investigation of the lot or batch and determine, to the extent possible, the source of the discrepancy. The deviation must be documented, justified, and approved by the general manager.

- (4) Each shipment of marijuana product or waste received at, or distributed by, the operation must be accompanied by an appropriate detail of the chain of custody.
- (5) The ultimate fate of any scrap, marijuana waste, and any rejected constituents or packaging materials, must be recorded.

#### COMPLAINTS, RETURNS, AND RECALLS

Complaints, returned products, and recalls must be handled in accordance with the Quality Control and Product Recall Plan.

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EXHIBIT: FACILITY MAINTENANCE LOG

\*This form should be completed [online](#).

Date:

List employees performing facility cleaning/  
maintenance:

List tasks performed:

List rooms or areas inside the facility which were the focus of these activities:

Select all methods used for this facility maintenance:

- Wet (spray equipment, rinsing, washing, or scrubbing)
- Dry (wiping, vacuuming, sweeping, or blowing or compressed air)
- Chemical solution application
- General repairs
- Painting
- Other

List all cleaning solutions or other chemicals used during this facility maintenance operations:

Select methods for preventing exposure of product to cleaning solutions during these operations:

- Temporary relocation of plants/product
- Air purifiers/fans
- Plant containment cover
- Product storage-container cover
- Rinsing surfaces to remove cleaning solution residue
- Other

Additional comments:

Employee Signature

EXHIBIT: PROCEDURE VARIANCE LOG

\*This form should be completed [online](#).

# Procedure Variance Log

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Date

List applicable policy and procedure(s):

Explain details of the circumstances or event leading to the changes in the policy and procedure(s) listed above:

List the employees and managers involved with the circumstances or event mentioned above:

Additional comments:

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Department Manager Signature



EXHIBIT: GUIDANCE FOR CREATING MASTER PRODUCTION FORMULAS AND RECORDS

Food and Drug Administration guidance for developing master production formulas and records and batch production records:

<http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcr/CFRSearch.cfm?CFRPart=111&showFR=1&subpartNode=21:2.0.1.1.11.8>

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1.0	11/01/2013	Plan release.	DRC	GM – 11/1/13

## REGULATORY – PRODUCTS AND PRICING

Discriminatory pricing prohibited.

Sec. 21a-408-52. Operation of production facility

(b) A producer shall not:

(7) Either directly or indirectly discriminate in price between different dispensary facilities that are purchasing a like, grade, strain, brand, and quality of marijuana or marijuana product, provided nothing herein shall prevent differentials which only make due allowance for differences in the cost of manufacture, sale or delivery resulting from the differing methods or quantities in which such marijuana or marijuana products are sold or delivered to such dispensary facilities.

Authorized products.

Sec. 21a-408-55. Manufacturing of marijuana products

(a) A producer shall only manufacture or sell marijuana products in the following forms:

- (1) Raw material;
- (2) Cigarettes;
- (3) Extracts, sprays, tinctures or oils;
- (4) Topical applications, oils or lotions;
- (5) Transdermal patches;
- (6) Baked goods; and
- (7) Capsules or pills.

(b) No marijuana product shall:

- (1) Include alcoholic liquor, dietary supplements or any drug, except for pharmaceutical grade marijuana. For purposes of this provision, alcoholic liquor does not include any liquid or solid containing less than one-half of one percent of alcohol by volume or ethanol-based tinctures with an alcohol level approved by the commissioner;
  - (2) Be manufactured or sold as a beverage or confectionary;
  - (3) Be manufactured or sold in a form or with a design that:
    - (A) Is obscene or indecent;
    - (B) May encourage the use of marijuana for recreational purposes;
    - (C) May encourage the use of marijuana for a condition other than a debilitating medical condition; or
    - (D) Is customarily associated with persons under the age of eighteen;
  - (4) Have had pesticide chemicals or organic solvents used during the production or manufacturing process, except that the commissioner may authorize the use of pesticide chemicals for purposes of addressing an infestation that could result in a catastrophic loss of marijuana crops.
- (c) Any marijuana product not in compliance with this section shall be deemed adulterated.

## GENERAL – PRODUCTS AND PRICING

Pricing policy must be maintained.

The general manager shall implement and maintain a pricing policy. The pricing policy must incorporate the policies and procedures for provision of discounted medical marijuana to dispensaries for a compassionate need program. Product discounts shall be applied to all product categories for participating dispensaries. At the time established reserve funds have been reached, the compassionate need program shall provide up to a 15% discount on gross sales to be provided to patients by dispensary purchasers.

Pricing authority.

The general manager is responsible for pricing of products. The general manager shall not discriminate in price between different purchasers. No employee shall alter established prices without authorization from the general manager.

Price list must be available.

The general manager will make available at all times accurate price lists for all available products, and alternate price lists for the compassionate need program on a secure web portal accessible to licensed dispensaries only.

No advertising of prices.

Greenbelt Management shall not publically advertise the price of marijuana. Price lists shall only be available to licensed dispensaries.

Products allowed for sale.

Greenbelt Management may not produce or sell any products other than:

- (1) Raw material;
- (2) Cigarettes;
- (3) Extracts, sprays, tinctures or oils;
- (4) Topical applications, oils or lotions;
- (5) Transdermal patches;
- (6) Baked goods; and
- (7) Capsules or pills.

Recordkeeping.

The general manager is responsible for true and accurate records entered and maintained in the inventory management and point of sale systems. All sales records must record the price of all products sold and comply with all policies and procedures in Greenbelt Management's **Sales Plan**.

## PRODUCT AND SERVICE MIX

Product selection.

Greenbelt Management aims to provide the most advanced and effective products for patients. The general manager shall determine the appropriate products to cultivate and manufacture in coordination with the cultivation manager. The general manager shall take into account new technologies, scientific data, and patient requests when determining production schedules and product offerings.

Product offerings.

Greenbelt Management will carry a variety of quality medical marijuana products to provide a full range of products to dispensaries. Our guiding philosophy is to develop products that will bring efficacy, consistent quality, fair pricing, and satisfaction to Connecticut's patients. The product mix should be based on the most current information available. Strain selections shall be based on offering the widest variety of cannabinoid and terpene profiles possible. Products shall be offered in a wide selection with a variety of applications and strengths. Greenbelt Management will implement a three year product development plan to achieve the following product mix:

*Marijuana Flowers*

- (1) Sativa hybrids – inventory goal: 5 strains with high THC content
- (2) Indica hybrids – inventory goal: 5 strains with low THC content
- (3) High CBD – inventory goal: 2 Strains with very low THC and high CBD content

*Marijuana Concentrates*

- (1) Kief – as available from all strains produced
- (2) Hash – is available from all strains produced
- (3) Hash oil – as available from all strains produced

*Manufactured Infused Products*

Oral Delivery

- (1) Extended release lozenges – multiple strength options
- (2) Quick release sublingual tablets – multiple strength options
- (3) Capsules – multiple strength options
- (4) Cannabis oil – bulk cooking oil - for home use
- (5) Sprays – alcohol based mist – variety of strengths
- (6) Tinctures – glycerin and alcohol based – variety of strengths

Topicals

- (1) Salves
- (2) Creams
- (3) Body oils

*Accessories and Vaporizers*

- (1) Pre-filled oil vaporizer pens
- (2) Refillable oil vaporizer pens
- (3) Raw material vaporizers
- (4) Electronic dual-use vaporizers
- (5) Miscellaneous smoking accessories

PRICING POLICIES

Pricing philosophy.

Greenbelt Management is a corporation established for the benefit of medical marijuana patients and our shareholders in the State of Connecticut. The general manager shall use a cost-plus pricing basis when determining pricing. Our pricing model shall meet and be a result of our financial goals:

- (1) To cost-effectively provide a consistently high-level of quality to our dispensaries;
- (2) To retain sufficient reserves for emergency situations, capital improvements, and future expansion;
- (3) To provide a usual and reasonable rate of return to our investors; and
- (4) To give generously in the communities where our operations, employees, and patients are located and to organizations which align with our mission.



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## PACKAGING AND LABELING PLAN SUMMARY

This section describes packaging and labeling procedures for marijuana and marijuana infused products (MIPs) in accordance with state law and regulations.

It is established that all marijuana will be packaged in plain, opaque, tamper-proof and child-proof containers without depictions of the product, cartoons, or images other than the company's logo. Example images of acceptable packaging materials and product labels are included. Only food- or pharmaceutical-grade packaging materials will be utilized for marijuana products cultivated and manufactured by Greenbelt Management.

All packaging operations will take place on sanitized work surfaces, supervised by a manager, and performed utilizing a NTEP Legal for Trade scale registered by the local municipality if required. Approved scales will be integrated into the point of sale system whenever possible.

Labels will include legible wording no less than 1/16 inch in size and be firmly affixed on each package of marijuana and MIP prepared for dispensing. A detailed description of Department-required information to be contained on all labels is provided. Required warning labels and organic labeling restrictions are addressed. The general manager is assigned responsibility to ensure all labels meet the requirements listed herein.

## REGULATORY – PACKAGING AND LABELING

Sec. 21a-408-34. Operation of dispensary facility

(e) dispensary facility shall sell marijuana products only in the original sealed containers or packaging as delivered by the producer, except that a dispensary may remove the marijuana product from the producer's child-resistant container or package and place the marijuana product in a non-child-resistant, secure and light-resistant container upon a written request from the qualifying patient or primary caregiver so long as all original labeling is maintained with the product.

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

- (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) 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) 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) 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) 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) 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 or local 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 the Bakeries Act, Connecticut General Statutes, sections 21a-151 to 21a-159, inclusive.
- (d) 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.

## GENERAL - PACKAGING

General packaging requirements.

Marijuana shall be packaged for distribution in the production facility. Marijuana products must be packaged in plain, opaque, tamper-proof, and child-proof containers without depictions of the product, cartoons, or images other than Greenbelt Management's logo. Examples of acceptable packaging are found in the Exhibits.

Quantities packaged.

The general manager will determine the quantity of marijuana packaged in each unit based on patient demand reported from dispensary clients. The processing manager will oversee the packaging process based on direction from the appropriate department manager.

Packaging materials.

Only food- or pharmaceutical-grade packaging materials shall be utilized for marijuana products cultivated and manufactured by the company.

Utensils and separate work surface required.

Employees must utilize sterile gloves or sanitized utensils for packaging marijuana products. Packaging must take place on a work surface that has been sanitized prior to packaging operations and after any contact with uncured marijuana or raw foods.

Retail scale required.

All packaging operations must be supervised by a manager and performed utilizing a NTEP Legal for Trade [licensed](#) by the Department of Consumer Protection. Such scales shall be integrated into the point of sale system whenever possible.

Equipment use restricted.

The use of equipment in packaging operations is limited to responsible trained personnel familiar with any potential hazards of the operation as determined by the department manager.

## REDUCED OXYGEN PACKAGING

Greenbelt Management may utilize reduced oxygen packaging methods for some products. Reduced oxygen packaging (ROP) is a packaging procedure which results in a reduced oxygen level in the sealed package and decreases the amount of competing spoilage bacteria normally found in certain products. The resulting package combats product degradation and contamination, is a more aesthetically pleasing product to the patient, and in many cases will extend the shelf-life of the marijuana product.

Acceptable methods of ROP.

The general manager in coordination with the cultivation manager and manufacturing manager shall determine the most appropriate packaging method for each marijuana product. Greenbelt Management managers may employ any of the following methods of ROP:

- (1) Modified atmosphere packaging (MAP) - a packaging method in which a combination of gases such as oxygen, carbon dioxide, and nitrogen is introduced into the package at the time of closure;
- (2) Controlled atmosphere packaging (CAP) - a packaging method in which selected atmospheric concentrations of gases are maintained throughout storage. Gas may either be evacuated or introduced to achieve the desired atmosphere; and
- (3) Vacuum packaging (VP) - rigid or flexible containers from which substantially all air has been removed before sealing. Carbon dioxide or nitrogen may be introduced into the container.

Use of gases in packaging.

Presently no gases are utilized in packaging; however, the method is not prohibited by Greenbelt Management. Food quality gases must be utilized. If these gases are used but not commercially available in organic form, the marijuana may still be labeled as "organic" or "made with organic (specified ingredients)." 7 CFR 205.605.

Prevention of contamination.

- (1) All equipment, utensils, and marijuana and food contact surfaces used for processing ROP marijuana products shall be cleaned and sanitized immediately prior to packaging and regularly throughout production.
- (2) Cleaning and sanitizing procedures must also be followed when any product is to be packaged after raw food was present.

ROP products.

Cured marijuana flowers and some MIPs will be packaged using ROP methods. The cultivation manager and production manager with approval from the general manager will determine the packaging methods for each marijuana product. Based on these determinations, managers will create par ordering levels for packaging materials.

MIPs containing food products.

- (1) MIPs to be packaged with reduced oxygen that contain food products shall be maintained at 41°F as or less as necessary, and
- (2) Have an Aw of 0.91 or less, or
- (3) A pH of 4.6 or less.

ROP operations limited to trained personnel.

Employees conducting ROP packaging must be fully trained in procedures by the department manager.

## GENERAL - LABELING

Employees may not change labels.

No employee may alter, obliterate, or destroy any label attached to a medical marijuana container or package. A manager is required to make changes to any label.

Inventory control and point of sale system labeling.

Labeling shall be produced by the inventory control or point of sale system. The general manager shall ensure labels meet the requirements listed herein. Label examples are available in the Exhibits.

Marijuana labeling requirements (excluding MIPs).

The point of sale system shall produce a label for each package of marijuana. The processing manager shall be responsible to ensure all labeling is compliant with Sec. 21a-408-56.

No certified organic labels.

Greenbelt Management shall not label marijuana as organic, with the USDA seal; and/or the seal, logo, or other identifying mark of a certifying agent or a statement "Certified organic by \* \* \*," or similar phrase 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.

Labeling marijuana and MIPs organic.

The department manager may direct the processing manager to label marijuana or MIPs as organic when approved by the general manager. The department manager must calculate the percentage of organically produced ingredients or additives in accordance with National Organic Program standards to determine the appropriate label. 7 CFR 205.302.

Production manager responsible for labeling.

The production manager shall determine labeling statements for MIPs based on appropriate specific scientific documentation or evidence to demonstrate the safety of the marijuana product.

Ingredients must be labeled.

- (1) MIPs that contain ingestible items must identify on the label potential food allergy ingredients, including milk, eggs, fish, shellfish, tree nuts, peanuts, wheat and soybeans.
- (2) MIPs that contain ingestible items must include on the label or on a label affixed to its packaging, a list of all ingredients contained in the product, in order from most abundant to least abundant.

 GREENBELT MANAGEMENT TRAINING PLAN DRAFT

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**REVISION LOG**

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## TRAINING PLAN SUMMARY

Greenbelt Management's Training Plan identifies all trainings necessary and required in order for all employees to perform all job duties and functions safely and in compliance with all applicable law and regulations. The general manager is designated to provide, or cause to be provided, all relevant and adequate training for each individual involved in Greenbelt Management operations.

It is established that training programs will be tailored to the roles and responsibilities of the job function of each employee, including training on confidentiality and other topics as specified by the Department. Staff will annually receive a minimum eight hours of on-going training. Required training documentation is addressed, and a Human Resources Manager is made responsible for maintaining required documentation of all required training, including signed statements of trainees.

A module-based training strategy is established and a required training schedule is provided. Procedures for new employee orientation are described with specific areas of focus, including a required overview of the applicable laws and regulations.

Additional provisions address training relevant to department meetings, medical marijuana science, recordkeeping, incident management, diversion prevention, compliance, product handling and sanitation, community and patient relations, safety and security. Processes for training evaluation and performance reviews are detailed.

## GENERAL - TRAINING

### **Greenbelt Management training philosophy.**

Greenbelt Management is committed to training all employees as necessary and required in order to perform all job duties and functions safely and in compliance with all applicable law and regulation. It is our policy to ensure that all employees receive professional and appropriate training on compliance with state law, medical marijuana use, safety, security, incident management, and diversion and theft prevention.

### **General Manager responsible for training.**

The general manager must provide or cause to be provided all relevant and adequate training for each individual involved in Greenbelt Management operations. Training shall be tailored to the roles and responsibilities of the job function of each employee, and at a minimum must include training on confidentiality, and other topics as specified by the Department. At a minimum, staff shall receive 8 hours of on-going training annually.

### **Training development.**

The human resources manager, in coordination with the general manager, shall develop appropriate and necessary training modules. Input from department managers on training needs shall be considered when modifying modules or training schedules. Training modules shall be updated as frequently as needed. The human resources manager shall determine the need for retraining current employees after a module update or modification.

**Authorized trainers.**

Each department manager must be trained by the human resources manager and general manager to provide new employee orientation and basic training. Specialized areas of training such as security or sanitation may be provided by outside resources including consultants or service providers. The human resources manager must ensure training content and presentations from outside trainers meets the needs and requirements of the Greenbelt Management. The general manager and the human resources manager shall receive training and advice from resources approved by the board of directors including the operations consultant, attorneys, the security vendor, etc.

**Training documentation required.**

The human resources manager is responsible for documentation of all required training including the signed statement of the individual indicating the date, time, and place he or she received said training and the topics discussed, including the name and title of presenters in accordance with Greenbelt Management's **Recordkeeping, Reporting, and Notifications Plan**.

## TRAINING MODULES

**Module-based training.**

Greenbelt Management employs a strategy of module based training. Each module covers a single topic in-depth.

Training modules include:

- (1) New employee orientation.
- (2) Train the trainer.
- (3) Monthly department meetings.
- (4) Compliance, regulation, and law.
- (5) Confidentiality.
- (6) Cultivation safety.
- (7) Cultivation security.
- (8) Dispensary safety.
- (9) Dispensary security.
- (10) Emergency and incident management.
- (11) Inventory management and diversion prevention.
- (12) Manufacturing safety.
- (13) Medical marijuana science.
- (14) Community and patient relations.
- (15) Recordkeeping.
- (16) Product handling and sanitation.
- (17) Transportation.

**Draft required training schedule.**

TRAINING MATRIX				General Manager/Asst GM	Controller/Bookkeeper	Inventory Manager	Admin Assistants (All Dept)	Dispensary Manager/Asst Mgr	Patient Coordinator	Dispensary Agent	Cultivation Manager/Asst Mgr	Processing Manager	Gardener	Trimmer	Production Manager/Asst Mgr	Extraction Mgr/Assistant	Edibles Mgr/Assistant	Infused Products Manager/Asst	Packaging Manager/Asst	Operations Manager	Quality Assurance Manager	Security Manager	Maintenance Manager	Transportation Manager
Training Module	Hours	Frequency	Trainer	ADMINISTRATIVE			DISPENSARY			CULTIVATION				MANUFACTURING				OPERATIONS						
*Confidentiality	1.0	Annually	Human Resource Manager	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
*Cultivation Safety	1.0	Semi-Annually	Cultivation Manager								x	x	x	x					x	x				
*Cultivation Security	1.0	Semi-Annually	Cultivation Manager			x					x	x	x	x					x	x			x	
*Dispensary Safety	0.5	Semi-Annually	Dispensary Manager					x	x	x											x			
*Dispensary Security	1.0	Semi-Annually	Dispensary Manager			x		x	x	x											x		x	
Emergency/Incident Management	1.0	Annually	General Manager			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Inventory Management and Diversion Prevention	1.0	Annually	Inventory Manager		x		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
*Manufacturing Safety	2.0	Semi-Annually	Manufacturing Manager												x	x	x	x	x	x				
Medical Marijuana Science	4.0	Annually	Outside Trainer					x	x	x	x		x		x	x	x	x				x		x
Medical Marijuana Science Update	2.0	Annually	Outside Trainer					x	x	x	x				x	x	x	x				x		x
Monthly Department Meetings	2.0	Monthly	Department Manager		x	x	x		x	x		x	x		x	x	x	x	x	x		x	x	x
*New Employee Orientation	8.0	Upon Hire	Department Manager		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Patient Relations	2.0	Semi-Annually	Dispensary Manager					x	x	x											x			x
Recordkeeping	1.0	Annually	General Manager		x	x	x	x	x	x	x	x			x	x	x	x	x	x	x	x	x	x
Compliance, Regulation, and Law	2.0	Annually	General Manager		x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Product Handling and Sanitation	1.0	Annually	General Manager			x		x	x	x	x	x	x	x	x	x	x	x			x			x
Transportation	1.5	Annually	General Manager			x		x	x	x	x									x		x		x
Train the Trainer	16.0	Upon Hire	Outside Trainer	x		x		x			x				x						x			
*Required prior to working on site.																								
Assumptions: Assumes the MIP's facility is housed within the Cultivation facility.																								

**New employee orientation.**

All new employees are required to receive new employee orientation prior to beginning work at any facility. Each department manager provides the new employee orientation for employees assigned to their department, in coordination with the human resources manager. The new employee orientation includes a summary overview of all training modules. Training includes a review of the Operating Plans including the Employee Manual. The human resources manager is responsible for development and maintenance of all new employee orientation materials. Topics that must be highlighted include:

- (1) Overview of the applicable STATE medical marijuana laws and regulations.
- (2) Greenbelt Management and operations overview.
- (3) A definition of a qualified, registered patient and the services we can provide.
- (4) Standards of conduct and reasons for dismissal.
- (5) Federal laws impacting the employee and operation.
- (6) Local laws and zoning requirements.
- (7) Employee’s role in community and patient relations.
- (8) Medical marijuana science and Greenbelt Management’s commitment to science based operations.
- (9) The legal importance of confidentiality and records management.
- (10) The employee’s role in emergency and incident management.
- (11) Department specific safety.
- (12) Department specific security and the employee’s access to records and storage.
- (13) The employee’s role in inventory management and diversion prevention.
- (14) The Greenbelt Management’s focus on quality operations and preventing product contamination.



**Train the trainer.**

Greenbelt Management utilizes the “train the trainer” method throughout the organization. The benefits for trainer managers include enhanced skills and knowledge, mastery of materials, and knowledge transfer to Greenbelt Management employees. The Greenbelt Management gains increased organizational knowledge and a staff that continually engages and operates in a training based environment.

- (1) The general manager, human resources manager, and each department manager must receive “train the trainer” certification from a board approved source. The American Management Society and the American Society for Training and Development are approved programs.
- (2) Department managers may select employees to become department trainers for certain functions (i.e. a dedicated employee to train new employees on the point of sale system). Department managers should utilize these trainers for peer to peer training at monthly department meetings (i.e. an update on plant feeding schedules).

**Monthly department meetings.**

Each department is required to hold monthly department meetings. The department manager shall create an agenda for each meeting addressing operational issues and reinforcing training priorities. Updates to any training module that do not require a re-training as determined by the human resources manager shall be addressed at the monthly department meetings.

**Compliance, regulation, and law.**

Compliance training is developed by the general manager and human resources management. All employees must have a thorough understanding of the legal and regulatory requirements of the Greenbelt Management in general and specifically related to their duties. All compliance aspects of the Operations Manual will be highlighted in the training. Employees shall receive updated training annually and more often as necessary to maintain a compliant operation.

**Confidentiality.**

Regulation requires that all employees receive confidentiality training. The general manager must develop and implement this training protocol in coordination with the human resources manager. The training must include:

- (1) A description of information that is required from patients and caregivers.
- (2) An explanation of what information should not be collected from patients and caregivers.
- (3) Procedures for handling and storing patient and caregiver information.
- (4) An advisement that disclosure of any patient or caregiver information without written consent from the patient or caregiver is a terminable offense. Exceptions include:
  - (a) A court order release (to be handled by the general manager only), and
  - (b) Access by the Department to carry out official duties.

**Safety training.**

Safety training is developed and implemented by the general manager in coordination with the department managers. Training is focused on employee, visitor, and product safety. The training must be department focused and address all items in the **Safety Plan**.

**Security training.**

Security training is developed and implemented by the general manager in coordination with the security manager. Training is focused on employee, visitor, and product security. The training must be department specific and address all items in the **Security Plan**.

**Emergency and incident management.**

Emergency and incident management training is developed and implemented by the general manager in coordination with the human resources manager. Training is focused on employee, visitor, and product safety and security. The training must be department specific and address all items in the Greenbelt Management's **Incident Response Plan**.

**Inventory management and diversion prevention.**

Inventory management and diversion prevention training is developed and implemented by the general manager in coordination with the inventory manager. Training is focused on accuracy in inventory counts and preventing and identifying diversion. The training must be department specific and address all items in the Greenbelt Management's **Inventory Management and Waste Disposal Plan**, as well as the **Anti-Diversion Plan**.

**Medical marijuana science.**

Medical marijuana science training will be outsourced by the general manager to a board approved source. Americans for Safe Access is an approved source of training. Training must address:

- (1) The endocannabinoid system;
- (2) Clinical trial information;
- (3) Efficacy and dosing;
- (4) Strains and genetics;
- (5) Methods of use and types of products;
- (6) Condition management; and
- (7) Side effects.

**Community and patient relations.**

Community and patient relations training is developed and implemented by the general manager in coordination with the dispensary manager. Training is focused on good neighbor policies, quality of care, and complaint handling. The training must be department specific and provide employees with specific action items. Training of employees who will work in the dispensary shall receive additional training on acceptable forms of identification, purchase limits, patient education, and vaporizers.

**Recordkeeping.**

Recordkeeping training is developed and implemented by the general manager in coordination with the human resources manager. Training is focused on regulatory and operational recordkeeping requirements. Training must be department specific and clearly identify the employee's role and responsibilities in recordkeeping activities.

**Product handling and sanitation.**

- (1) Product handling and sanitation training is developed and implemented by the general manager in coordination with the department managers. Training is focused on quality control and product safety.

- Training must be department specific and clearly identify the employee's role and responsibilities in preventing contamination. All items in the **Quality Control and Product Recall Plan** shall be covered.
- (2) Department managers shall provide employees who handle medical marijuana appropriate training in proper hygienic practices with specific attention to preventing microbial contamination of handled marijuana.

**Transportation.**

Transportation training is developed and implemented by the general manager in coordination with the inventory manager. Training is focused on employee, patient, and product safety. The training must address all items in the **Product Storage and Delivery Plan**.

## TRAINING EVALUATION

**Evaluation required.**

Greenbelt Management's training program is essential to achieving quality, efficient, and compliant operations. The human resources manager shall evaluate the training program annually. Based on the results of the evaluation, the general manager shall implement necessary changes and determine the need for re-training of staff. Major training program changes must be approved by the board of directors.

**Staff feedback.**

The human resources manager shall solicit feedback on the quality and efficacy of a training module from staff which received the training. Feedback may be solicited utilizing the following methods:

- (1) Post-training group discussions.
- (2) Individual interviews.
- (3) Anonymous surveys.

**Stakeholder feedback.**

The human resources manager in coordination with the general manager will solicit feedback from patients, vendors, consultants, community members, etc., about the competence of the Greenbelt Management in the areas that the training program addressed. Feedback solicited from stakeholders should address the following:

- (1) The quality of interactions with staff.
- (2) Any changes in Greenbelt Management policies or procedures directly affecting the stakeholder.
- (3) The effectiveness of the Greenbelt Management overall.
- (4) Any changes in the way the Greenbelt Management is perceived by the stakeholder.

**Observation and performance review.**

The human resource manager, in coordination with the general manager and department managers, shall evaluate the effectiveness of training through observation of employee performance. These evaluations should consider:

- (1) Adoption of policies, procedures, concepts, and attitudes presented in the training for new employees.
- (2) Level of improvement, drive or lack thereof toward improvement, in the performance of veteran staff.
- (3) Adoption of the training topics in practice and how well are they working.
- (4) Managers and trainer observations of staff attitudes, methods, or competency.
- (5) The level of discussion between staff members and managers regarding training topics presented on an ongoing basis.